

AC Chat:

Andrea Glandon: (1/17/2019 06:19) Welcome to day 2 of the EPDP Team F2F meeting held on Thursday, 17 January 2019 at 13:30 UTC.

Andrea Glandon: (06:20) Wiki Meeting Page: https://community.icann.org/x/sAn_BQ

Rafik Dammak (GNSO Council Liaison): (07:05) good morning

Ayden Férdeline (NCSG): (07:30) good morning Rafik

Rafik Dammak (GNSO Council Liaison): (07:34) Hi Ayden

Terri Agnew: (07:35) we will begin in 1 minute

Hadia Elminiawi (ALAC): (07:43) good morning all

Terri Agnew: (07:46) 10 minutes to review (will be silence)

Marika Konings: (07:46) PCRTs and discussion tables can be found here: <https://community.icann.org/x/U4cWBg>

Terri Agnew: (07:52) update: 10 additional minutes to review (will be silence)

Terri Agnew: (08:03) upate: 3 additional minutes to review (will be silence)

Terri Agnew: (08:11) we have started

Ayden Férdeline (NCSG): (08:20) ALAC has now had 2 representatives speak on this purposee

Leon Sanchez (ICANN Board Liaison): (08:24) Thomas isn't that a discussion that we will have when discussing an access model?

Kavouss Arasteh (GAC): (08:24) enabling lawful access for legitimate third party interest i.e. law enforcement, intellectual property, consumer protection et.al whiée ensuring the security, stability and resi.....in accordancde with ICANN mission

Emily Taylor (RrSG): (08:24) Support Thomas' point. To be clear - contracted parties recognise their legal obligations to disclose data to those with legitimate interests. That obligation does not require there to be a purpose of such disclosure when the data is collected.

Leon Sanchez (ICANN Board Liaison): (08:26) Emily, from my understanding of the law, for data to be legally processed there should be a purpose for it and that purpose should be informed to the data subject for it to comply with the law. If we delete this purpose, how would third parties with legitimate interest have access without having the data controleer/processor be liable? I might be mistaken in my view, of course

Mark Svancarek (BC): (08:26) This is an ICANN purpose insofar as ICANN requires a mechanism to enforce the lawful disclosure under 6.1.f. This purpose supports that mechanism.

Thomas Rickert (ISPCP): (08:26) Leon, right. But I think we need to know more than we do now to cast the purpose language in concrete.

Milton Mueller (NCSG): (08:28) Mark, this is not a purpose for data collection, it is just a request for access for legit third party interests

Mark Svancarek (BC): (08:29) Milton, this purpose states that it is not about collection. It is about disclosure of data collected for other purposes.

Milton Mueller (NCSG): (08:30) Leon, you are confusing third party disclosure requests with an ICANN purpose. As Stephanie explained, banks collect lots of info from their customers and they disclose it to LEAs, but they do not say they have a purpose for doing so when they collect it

Milton Mueller (NCSG): (08:30) Mark: listen to what Ruth is saying. You don't NEED to call it a purpose in order to get lawful access

Leon Sanchez (ICANN Board Liaison): (08:31) Agree with that Milton. But how do we fit into that equation those parties that are not LEAs? LEAs have legal tools to make themselves heard. Other parties don't on their own. Other parties would need to go through LEAs or courts for them to have that access?

Milton Mueller (NCSG): (08:32) Leon, we do that during phase 2 when we define conditions for disclosure.

Amr Elsadr (NCSG): (08:32) EU Data Protection Experts input on this to the RDS PDP WG: "Purposes have to have a legitimate aim and the processing has to be necessary and proportionate to the legitimate aim pursued. Translating this to ICANN means the WG would want to take a look into ICANN role and its mission statement and separate out the legitimate data processing purposes, and determine which data are necessary for which purpose. It is to be underlined that the compatibility of the processing to the original legitimate purpose should be also looked into at this point. You have also to bear in mind that according to all existing legal texts, the data controller has to be accountable for the data processing and that the purpose of the WHOIS directories cannot be extended to other purposes just because they are considered desirable by some potential users of the directories..."

Milton Mueller (NCSG): (08:32) e.g., everyone agrees (and it is already policy) that RNH data is disclosed to UDRP complainants at some point

Amr Elsadr (NCSG): (08:32) "..., To illustrate it with an example if ICANN determines that it has a role in cyber-security, it will become accountable for these kinds of data processing (meaning accuracy of data, handling complaints, providing subject access etc...) but cannot give out data just because law enforcement authorities may find it useful."

Kavouss Arasteh (GAC): (08:33) another option would be;

Kavouss Arasteh (GAC): (08:37) Consistent with ICANN Mission in bylaws ; to maintain the security, stability and resiliency of the Domain Name System ,enabling lawful access for legitimate third party interests i.e lawenforcement, intellectual property , consumer protection et.al ,

Kavouss Arasteh (GAC): (08:39) sorry we need to add after third party interest " to data elements " in both alternatives that I suggested in the chat

Amr Elsadr (NCSG): (08:40) We never nailed down what is within scope of ICANN's mission in the context of this purpose. If I'm not mistaken, the contracted parties and Ruth both indicated that this is necessary, as did the EU Data Protection Experts in their input, which I pasted into the chat above.

Kavouss Arasteh (GAC): (08:43) Third alternative would be

Kavouss Arasteh (GAC): (08:44) While ensuringintderests i.e. lawenforcement ,intellectual property, consumer protection et.al to data elements

Kristina Rosette (RySG): (08:57) +1 James

Kristina Rosette (RySG): (09:02) If Hadia was asking us to agree to the substance of a standardized access model before we've discussed it (and after we've said we'll discuss it later), I don't see how that would be possible.

Milton Mueller (NCSG): (09:05) Chris is conflating "being in the mission" (SSR) with "being an ICANN purpose"

Milton Mueller (NCSG): (09:05) this is wrong

Kristina Rosette (RySG): (09:05) If I've misunderstood what you were asking @Hadia, clarification in the chat would be helpful.

Milton Mueller (NCSG): (09:05) standardized access is a policy and is not a purpose

Diane Plaut: (09:05) +1 Chris

Milton Mueller (NCSG): (09:06) Chris' argument is totally illogical and I will refute it when I get the floor
Diane Plaut: (09:09) Milton we are trying to set up the foundation with what is rightfully within ICANN's mission with a Purpose, as needed for the policy and clarity

Milton Mueller (NCSG): (09:10) SSR is clearly in ICANN's mission. So is DRP with respect to domain names. No one is disputing that. The issue is, what is a GDPR-compliant disclosure policy and how standardized can it be across multiple registrars?

Alan Greenberg (ALAC): (09:12) @Milton, Recommendation 2 does not commit us to developing an access model. It commits us to CONSIDER such a model.

Milton Mueller (NCSG): (09:19) Well, the charter of the EPDP does commit us to develop access methods. Rec 2 just says we will consider a "standardized" one

Terri Agnew: (09:21) 15 minute break (will be silence)

Terri Agnew: (09:36) Update: 5 minutes longer for break (will be silence)

Terri Agnew: (09:45) Update: break has been extended, will chat once we are starting back up again

Terri Agnew: (09:49) we are starting back up

Farzaneh Badii (NCSG): (09:51) halleluja! so we don't need access purpose

Milton Mueller: (09:57) Most of us think we don't need it, but some people still think we do

Milton Mueller: (10:00) however the argument has shifted. No one can argue any more that we need that purpose to disclose data to legi third parties, but some are contending we need it to impose a uniform policy on the contracted parties

Chris Disspain (ICANN Board Liaison): (10:00) alternate suggested wording for purpose 2 'having determined, through its bottom up, multistakeholder policy development process, the purposes for which and the means through which registration data is made available to 3rd parties, maintaining the security, stability and resilience of the dns in accordance with ICANN's mission by implementing that policy'

Farzaneh Badii (NCSG): (10:01) uniform high bar data protection/ uniform access. no other way.

Kavouss Arasteh (GAC): (10:01) The question to be asked is, does anyone has major problem or concerns if access be seen as a purpose, eventhou ,strictly speaking it may be seen as a policy and not purpose

Kristina Rosette (RySG): (10:01) I'm confused, @Chris. Is the purpose to develop a purpose?

Milton Mueller (NCSG): (10:02) I think Chris's proposal confuses a policy with a purpose.

Kristina Rosette (RySG): (10:02) Not trying to be snarky. Want to make sure I understand.

Chris Disspain (ICANN Board Liaison): (10:02) And you are quite right Christina! :-)

Chris Disspain (ICANN Board Liaison): (10:03) Or even Kristina

Kristina Rosette (RySG): (10:03) :-)

Kavouss Arasteh (GAC): (10:05) This alternate text is vague and ambigeous

Kavouss Arasteh (GAC): (10:08) The ambiguity arises from the fact that in the text proposedc " Purpose" and " Polkicy" are both referred to and mixed up with each other..Moreover, we do not need to refer to BOTTOM -UP MULTISTAKEHOLDER here as such concept is valid for all purposes and all recommendations

Milton Mueller (NCSG): (10:09) Kavouss is correct here, Chris's proposal is policy guidance masquerading as a purpose

Kavouss Arasteh (GAC): (10:10) This text is not acceptable as it is disconnected in the middle and mixed up policy and purpose .Moreover, in none of the previous /other purposes we do not start the text with such introductory part

Kristina Rosette (RySG): (10:11) But we need ICANN Org to say this, not just Chris in his personal capacity/as a Board member.

Kristina Rosette (RySG): (10:11) [Referring to what Emily just said]

Milton Mueller (NCSG): (10:11) I still don't understand why anyone takes the claim that we need a (pseudo)purpose to develop a policy seriously. ICANN created the temp spec (which has specific disclosure commitments in it)

Chris Disspain (ICANN Board Liaison): (10:13) I thought that purpose 2 IS an ICANN purpose...Have I misunderstood?

Kavouss Arasteh (GAC): (10:13) Moreover, in the text there is no refernce to lawful and legitimate accesds to data elements which is a fundamental key words

James Bladel (RrSG): (10:14) @Chris - from our reading, it implicitly extends ICANN's mission to include third-parties.

Chris Disspain (ICANN Board Liaison): (10:14) Thanks James...I'll explore that when I get my turn to speak

Farzaneh Badii (NCSG): (10:14) it's just wrong for the Board liaison to say something in his "personal capacity". how is that even possible. That opinion has too much weight and might derail our conversation. Not a good move Chris. I did not appreciate it.

Emily Taylor (RrSG): (10:14) @Chris - it's probably just me, but I'm struggling to understand the meaning of your proposed wording

Chris Disspain (ICANN Board Liaison): (10:15) I appreciate your non-appreciation Fazaneh

Chris Disspain (ICANN Board Liaison): (10:15) Understood Emily..I may have been trying to solve a problem that isnt a problem

Farzaneh Badii (NCSG): (10:15) Last time you also suggested to add ICANN mission to this purpose. which made it even more vague.

Kurt Pritz: (10:17) @Marc - the Charter is very clear that Purposes can be added / edited during phase 2 of the work

Kavouss Arasteh (GAC): (10:18) I did not add ICANN Mission but said consistent with ICANN Mission

Kavouss Arasteh (GAC): (10:22) I suggested ; Enabling lawful access for legitimate third party interests(lawenforcement, intellectuasl property,consumer protection et asl) to data elements collected

Kristina Rosette (RySG): (10:22) I think the disconnect here is that, until now, it's been the EPDP WG trying to state the ICANN Purpose. What I think we need is to hear from ICANN Org (as the legal entity that is the party to the RA and RAA) what the ICANN Purpose is and how Purpose 2 should state that.

James Bladel (RrSG): (10:23) +1 Kristina

Matt Serlin (RrSG): (10:23) agree Kristina

Farzaneh Badii (NCSG): (10:24) But Kristina, that might be risky and might expand its purpose.

Kristina Rosette (RySG): (10:25) Farzaneh, I'm not necessarily saying that we'd sign off on it wholesale, but we've been shooting in the dark until now

Milton Mueller (NCSG): (10:25) Park Purpose 2.

Farzaneh Badii (NCSG): (10:26) I agree with parking purpose 2

Hadia Elminiawi (ALAC): (10:26) @James and kristina why don't you propose a language for purpose 2

Emily Taylor (RrSG): (10:26) +1 to Kristina's suggestion

Kavouss Arasteh (GAC): (10:27) I do not believe that parking the purpose is a good solution as it shift the problem to phase 2 in which we have the same debates

Mark Svancarek (BC): (10:29) 1000 bonus points to Kristina

Chris Disspain (ICANN Board Liaison): (10:32) Kristina, could you post a quick note in the chat setting out what you just said you would like from ICANN please?

Kristina Rosette (RySG): (10:37) @Chris: Will do.

Farzaneh Badii (NCSG): (10:40) so no adobe in these break out groups? we can be the non-participants for now?

Milton Mueller (NCSG): (10:41) looks like it

Farzaneh Badii (NCSG): (10:42) wonderful. I like being a non-participant.

Terri Agnew: (10:42) 30 minutes to review (will be silence)

Kristina Rosette (RySG): (10:48) @Chris: Here it is. LMK if you have questions. We're requesting a written articulation on behalf of ICANN Org (as the legal entity that is the party to the RA and RAA) of the ICANN Purpose on which ICANN Org would seek to base its enforcement against contracted parties a requirement of disclosure, and how Purpose 2 should be revised accordingly.

Terri Agnew: (11:13) update: 6 additional minutes (will be silence)

Terri Agnew: (11:23) update: couple more additional minutes (will be silence)

Terri Agnew: (11:32) we are starting

Amr Elsadr (NCSG): (11:36) Option B would be a purpose if it began with "Ensuring/Enabling lawful access...".

Farzaneh Badii (NCSG): (11:46) who came up with option C? is it a dissertation ?

Matt Serlin (RrSG): (11:47) a group of about a dozen of us

Terri Agnew: (11:48) lunch break - 1 hour (will be silence)

Farzaneh Badii (NCSG): (11:48) thanks Matt. enjoy lunch everyone .

Terri Agnew: (12:44) update: we will start a few minutes later than planned - will keep you posted.

Terri Agnew: (13:00) we are starting

Terri Agnew: (13:06) 2 minutes to review (will be silence)

Terri Agnew: (13:10) update: will need a little longer to review (will be silence)

Terri Agnew: (13:12) we have started

Stephanie Perrin (NCSG): (13:19) The NCSG members in the room are proposing dropping purpose 2 in favour of the following recommendation: The EPDP recognizes that ICANN has a responsibility to foster the openness, interoperability, resilience, security and/or stability of the DNS in accordance with its stated mission (citation required). It may have a purpose to require actors in the ecosystem to respond to data disclosure requests that are related to the security, stability and resilience of the system. Pending further legal analysis of the controller/joint controller relationship, and consultation with the EDPB, the EPDP recommends that further work be done in phase 2 on these issues, including a potential limited purpose related to the enforcement of contracted party accountability for disclosure of personal data to legitimate requests.

Alex Deacon - IPC: (13:19) Maintaining of the openness, interoperability, resilience, security and/or stability of the DNS including policies in the areas described in Annex G-1 and Annex G-2, in accordance with ICANN's mission through enabling [requiring] responses to lawful data disclosure requests.

Milton Mueller (NCSG): (13:21) Benedict made a good case that "interoperability" could be related to the disclosure

Alex Deacon - IPC: (13:28) A possible alternative to Option A (currently being displayed) - Ensure that ICANN Org can meet the requirements of its Mission and Bylaws, including issues related to security, stability and resiliency by requiring responses to lawful data disclosure requests.

Leon Sanchez (ICANN Board Liaison): (13:34) Yes Stephanie but this would enable a second layer of work that would take care of your concern, meaning designing the access model that would allow for that data to be disclosed lawfully under the criteria set by the community

Leon Sanchez (ICANN Board Liaison): (13:34) That's how I see it in my mind

Farzaneh Badii (NCSG): (13:38) sorry, participating remotely is getting more and more difficult because we are not in the loop about all the discussions. I will drop off. Does not mean I agree with everything the group has done.

Kristina Rosette (RySG): (13:43) To use David's language, I can't live with "ensure" because it's not accurate.

Kristina Rosette (RySG): (13:44) More specifically, ICANN's requirement of responses to lawful registration data requests is not sufficient to meet the requirements of ICANN's mission and bylaws

Terri Agnew: (13:44) 10 minute break (will be silence)

Alan Woods (RySG): (13:44) Also we cannot "require" an action in a purpose.. This is a purpose, not a policy statement.

Georgios (GAC): (13:54) Support ICANN org to meet the requirements of its Missions and Bylaws by enabling responses to lawful requests for registration data

Terri Agnew: (13:55) update: will begin shortly

Terri Agnew: (13:56) we are starting

Farzaneh Badii (NCSG): (13:59) I am back. Ayden is casting my vote for me in the room

Terri Agnew: (14:05) they will be using a key pad in the room, this will not be shown in adobe connect

Marika Konings: (14:07) Question is A. whether you like it, B. I don't like it, but I can live with it, C. I can't live with it

Farzaneh Badii (NCSG): (14:07) that's ok. Ayden knows my vote

Marika Konings: (14:08) This question is now open for: Contributing to the maintenance of the security, stability, and resiliency of the Domain Name System in accordance with ICANN's mission through enabling responses to lawful data disclosure requests.

Farzaneh Badii (NCSG): (14:08) thank you Marika

Marika Konings: (14:09) Now up is The EPDP recognizes that ICANN has a responsibility to foster the openness, interoperability, resilience, security and/or stability of the DNS in accordance with its stated mission (citation required). It may have a purpose to require actors in the ecosystem to respond to data disclosure requests that are related to the security, stability and resilience of the system. Pending further legal analysis of the controller/joint controller relationship, and consultation with the EDPB, the EPDP recommends that further work be done in phase 2 on these issues, including a potential limited purpose related to the enforcement of contracted party accountability for disclosure of personal data to legitimate requests.

Farzaneh Badii (NCSG): (14:21) if the group accepts the legal counsel addition there is no problem with it.

Marika Konings: (14:24) Here is the updated language as proposed by Ruth: Enabling responses to lawful data disclosure requests where necessary to contribute to the maintenance of the security, stability, and resiliency of the Domain Name System in accordance with ICANN's mission.

Milton Mueller (NCSG): (14:24) It will not change the holdouts, but I do like the wording change

Chris Disspain (ICANN Board Liaison): (14:24) Milton + 1

Milton Mueller (NCSG): (14:24) Based on Margie's comments, it sounds like the holdouts' concerns can be addressed in the recommendation

Chris Disspain (ICANN Board Liaison): (14:25) And again...Milton + 1

Milton Mueller (NCSG): (14:25) :-)

Farzaneh Badii (NCSG): (14:34) public data doesn't need a disclosure request!!!

Farzaneh Badii (NCSG): (14:34) you can see it published

Farzaneh Badii (NCSG): (14:34) nonpublic data means personal information!

Ayden Férdeline (NCSG): (14:34) Is the text on the projector correct, or are we using the alternative language as recommended by legal counsel?

Ayden Férdeline (NCSG): (14:35) for purpose 2

Marika Konings: (14:38) Enabling responses to lawful data disclosure requests where necessary to contribute to the maintenance of the security, stability, and resiliency of the Domain Name System in accordance with ICANN's mission.

Milton Mueller (NCSG): (14:40) I am not sure I understand Trang's concerns. There are a bunch of other purposes (e.g. 1, 3) that justify collection and display of other data

Farzaneh Badii (NCSG): (14:42) non personal data does not need justification for collection and display. I think the essence of this group was to identify personal data and purposes for processing them

Farzaneh Badii (NCSG): (14:45) we have

Farzaneh Badii (NCSG): (14:46) we have asked for legal views on this. the recommendations of this group has to be legal.

Alex Deacon - IPC: (14:47) +1 Chris.

Farzaneh Badii (NCSG): (14:48) I disagree completely with Hadia.

Milton Mueller (NCSG): (14:50) Our support for the footnote regarding precluding disclosure in ipR investigations has dissolved

Milton Mueller (NCSG): (14:51) The current text of Rec 2 is still very unclear - are we working from the text developed before lunch or from Stephanie's text?

Stephanie Perrin: (14:51) IN the current formulation, in accordance with ICANN's Mission modifies the security stability and resiliency of the DNS. It would have to move forward, to be a limiting factor in the disclosure of personal information

Chris Disspain (ICANN Board Liaison): (14:51) Milton, the text I've been looking at is on the physical piece of paper

Milton Mueller (NCSG): (14:54) Yes, but we also "took the pulse" on Stephanie's text

Marika Konings: (14:56) Farzaneh, you are in the queue

Chris Disspain (ICANN Board Liaison): (14:56) Is the physical paper not Stephanie's text??

Milton Mueller (NCSG): (14:56) No, it was completely different

Chris Disspain (ICANN Board Liaison): (14:56) Ah ok

Marika Konings: (14:56) @Chris - no, I believe that is from group 2

Chris Disspain (ICANN Board Liaison): (14:56) I'm sure it'll be fine

Andrea Glandon: (14:56) working on echo

Milton Mueller (NCSG): (14:57) anyway Steph's rec failed because it proposed to eliminate purpose 2, but some suggested that it could also be incorporated into Rec 2

Milton Mueller (NCSG): (14:57) while keeping purpose 2

Stephanie Perrin: (14:58) indeed, would you like me to copy it again here?

Stephanie Perrin: (14:59) The EPDP recognizes that ICANN has a responsibility to foster the openness, interoperability, resilience, security and/or stability of the DNS in accordance with its stated mission (citation required). It may have a purpose to require actors in the ecosystem to respond to data disclosure requests that are related to the security, stability and resilience of the system. Pending further legal analysis of the controller/joint controller relationship, and consultation with the EDPB, the EPDP recommends that further work be done in phase 2 on these issues, including a potential limited purpose related to the enforcement of contracted party accountability for disclosure of personal data to legitimate requests.

Stephanie Perrin: (14:59) Benedict would like an apostrophe removed, not sure where

Ayden Férdeline (NCSG): (14:59) it was to change "it's" to "its" (first sentence)

Farzaneh Badii (NCSG): (14:59) if it's not about RDDS then why are we discussing it here?

Stephanie Perrin (NCSG): (15:00) Yes thanks, that was it. (or its) (heh heh) (we need a break)

Chris Disspain (ICANN Board Liaison): (15:00) Benedict is a stickler for detail

Stephanie Perrin (NCSG): (15:00) Perfectly correct. We need attention to detail here.

Chris Disspain (ICANN Board Liaison): (15:00) *detail*

Margie Milam (BC): (15:01) Thanks Christina!

Terri Agnew: (15:02) 15 minutes to review (will be silence)

Terri Agnew: (15:19) update: 2 more minutes (will be silence)

Terri Agnew: (15:21) update: we will begin shortly (will be silence)

Terri Agnew: (15:22) we are starting

Marika Konings: (15:51) Dan, you are in the queue

Kavouss Arasteh 3 (GAC): (15:59) In regard with my earlier statement about legal advice, I was not aware that such advice was sought by one member of a stakeholder group. I will modify my statement in this regard by submitting a modified statement shortly at this session

Terri Agnew: (16:04) @Dan, are you able to adjust your mic

Chris Disspain (ICANN Board Liaison): (16:04) cannot hear you

Chris Disspain (ICANN Board Liaison): (16:04) back away from the mic

Amr Elsadr (NCSG): (16:04) I can hear him quite well. Can actually hear him better than folks in the room.

Milton Mueller (NCSG): (16:05) I think it's a problem here, converting his input into the speaker

Milton Mueller (NCSG): (16:06) someone should check the cable connection to the speaker

Terri Agnew: (16:08) 5 minute break (will be silence)

Amr Elsadr (NCSG): (16:10) I'm participating remotely, and can hear you clearly Dan.

Terri Agnew: (16:14) we are starting

Terri Agnew: (16:21) 8 minutes to review (will be silence)

Terri Agnew: (16:27) we are starting

Rafik Dammak (GNSO Council Liaison) 2: (16:54) nothing shared in AC?

Amr Elsadr (NCSG): (16:55) Can the current language for purpose 2 be posted in the AC room, please?

Marika Konings: (16:59) sorry, waiting for the document to come through on email

Kavouss Arasteh 3 (GAC): (17:05) It was noted that the disclosure for legitimate purpose is not incompatible with the purpose for which such data has been collected

Amr Elsadr (NCSG): (17:08) Thanks, Marika.

Terri Agnew: (17:10) 5 minutes to review (will be silence)

Milton Mueller: (17:14) My conclusion after deep reflection is that we need to do is replace "will seek to" with "must" Yes, this is a restatement of law, which cannot hurt. further wordsmithing of Purpose and Rec 2 is not worthwhile and we can accept it as it is.

Terri Agnew: (17:15) update; 5 additional minutes to review (will be silence)

Terri Agnew: (17:20) we are starting

Alan Woods (RYSG): (17:23) Suggestion : Finally, when considering the above issues, the EPDP team will be guided by the principle that in any resulting policy or process, any such disclosure will not be incompatible with the purposes for which such data has been collected."

rafik dammak: (17:33) james can yiu put ghe proposal in ac chat?

rafik dammak: (17:33) sorry for typos

Alan Woods (RYSG): (17:35) Hey Rafik they are going to draft and share for tomorrow. They don't have it quite yet

Alan Woods (RYSG): (17:35) *have

rafik dammak: (17:35) thanks alan

rafik dammak: (17:35) thanks everyone