GDPR and Regional Internet Registries

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19 February 2018 | EURALO Webinar
General Data Protection Regulation

• Adopted in April 2017
• Replacing the EU Data Protection Directive
• In effect from May 2018
The RIPE NCC

- Not-for-profit, membership-based organisation
- The registration authority for Internet number resources in Europe, Middle East and Central Asia
  - Operation of the publicly available RIPE Database
  - Maintenance of non public registration information
- Important role for the operations of the Internet globally
  - Accountability and clear governance procedures are vital!
Data Protection by the RIPE NCC

• The RIPE NCC already covered by the EU Data Protection Directive
  - Based in the Netherlands

• In 2006 the RIPE Community established the Data Protection Task Force (DPTF)
  - Mandate to recommend steps for the implementation of the Directive
  - Developed procedures and legal framework with the RIPE NCC

• Data Protection Report
Involvement in Legislative Discussions

• 2009 - EU public consultation on the legal framework for the fundamental right to protection of personal data

• The RIPE NCC submitted an opinion

“[…] The RIPE NCC considers that personal data related to the operators of the Internet should be easily available to each other, both inside and outside the EU, in order for those individuals to be able to contact one another to coordinate the proper functioning of the Internet around the world. […]”
Today: Preparing for the GDPR

• GDPR a good opportunity for a general review of all data sets processed by the RIPE NCC

• March 2017 - establishment of internal project
  - Review all personal data processed by the RIPE NCC
  - Project team consists of two legal counsels and two security officers
  - Support by colleagues of all department
  - Engagement of external legal counsels, industry partners etc
  - Communication and consultations with RIPE community is essential
Work So Far

• Catalogue of all data sets processed by the RIPE NCC (names, bank details, emails etc)

• Reviewing compliance with GDPR

• Areas of focus
  - RIPE Database
  - Retention of personal data
  - Internal process of all personal data
  - Other RIPE NCC services
Work So Far

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The RIPE Database (1)

• The purpose described in Article 3 of the RIPE Database Terms and Conditions
  - Established by the RIPE Community and the Data Protection Task Force

• Among others, it states:
  - “Facilitating coordination between network operators (network problem resolution, outage notification etc)”

• For this purpose, crucial to have publicly available contact information of individuals
  - Eg. cases of cyber attacks, quick contact among operators that have no direct (business) relations
The RIPE Database (2)

• Legal basis for processing of personal data
  - Contact information of resource holders —> legitimate interest of the Internet community
  - If the resource holder wants to insert contact information of another individual —> consent must be obtained, e.g. via employment or business relationship

• Personal data removal procedure:

• Implemented Safeguards
  - Maximum personal data queries
    ○ https://www.ripe.net/manage-ips-and-asns/db/support/documentation/aup
Stay Tuned!

• Series of RIPE Labs articles describing the GDPR preparations
  - https://labs.ripe.net/gdpr
  - More articles to come this month

• Webpage dedicated to GDPR
Questions

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