GDPR and Regional Internet Registries

Athina Fragkouli
Head of Legal
RIPE NCC

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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

  - https://www.ripe.net/about-us/legal/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

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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:

    ◉ https://www.ripe.net/manage-ips-and-asns/db/support/documentation/removal-of-personal-data

- 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

  - https://www.ripe.net/about-us/legal/corporate-governance/gdpr-and-the-ripe-ncc

Questions

afragkou@ripe.net