

Data Protection Report

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What is the Data Protection Report?

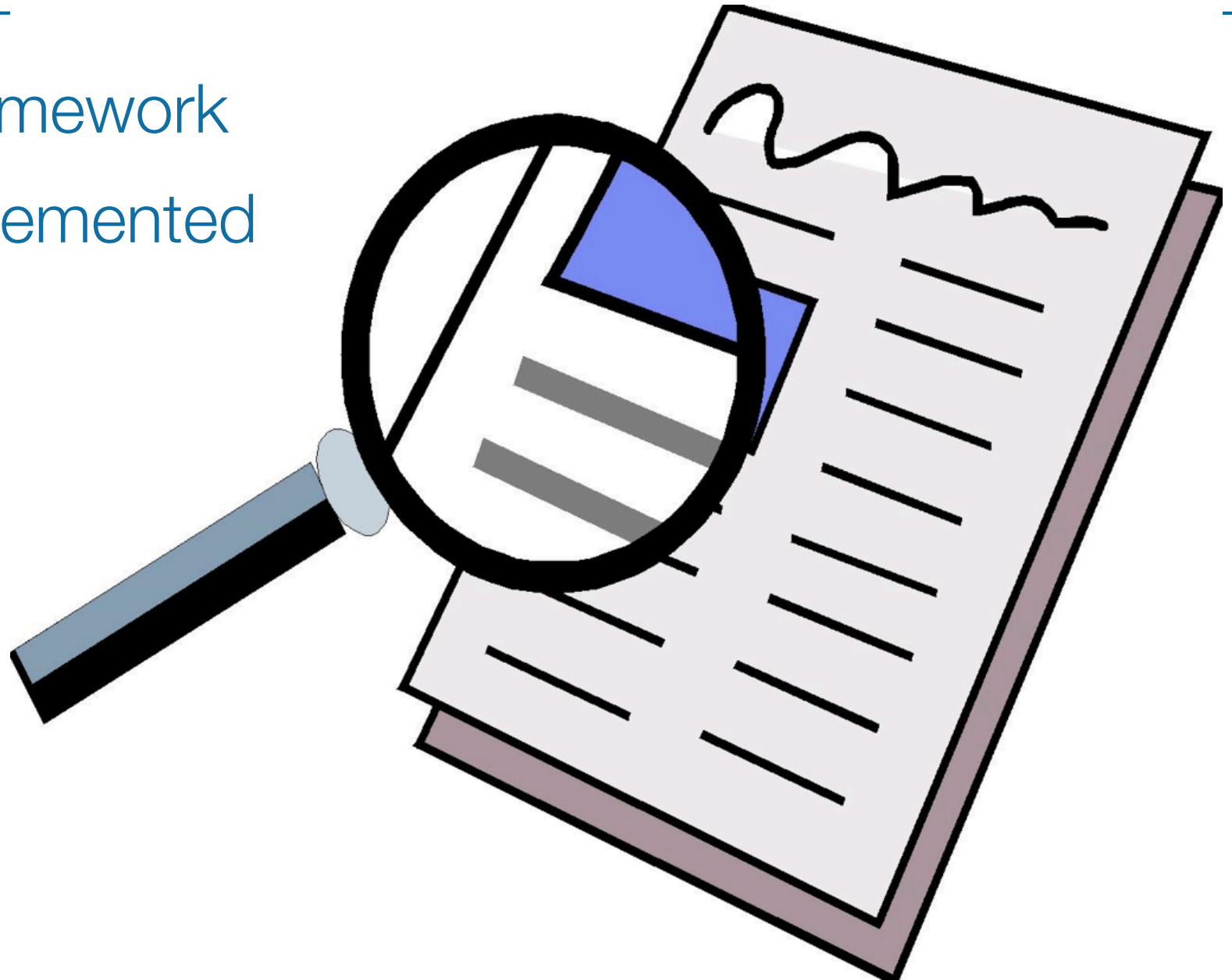
- Description of Data Protection legal framework
- Explanation of RIPE NCC's compliance in relation to:
 - RIPE Database
 - Other services
- Work mostly done by DPTF (2006-2010)
 - Transparent process

Why now?

- Governance Documents project
 - Documentation of NCC activities and procedures
- Since 2010:
 - New participants
 - New rules, new services
- Existing documentation needed updating:
 - No reference to legal framework
 - More details needed

The report

- Legal Framework
- How implemented



Personal data

Info relating to
identified or identifiable person

Processing of
personal data

Collecting, storing,
modifying, publishing, deleting etc.

Responsible party

The person that determines the purpose
and means of processing

Data subject

The person that personal data relates to

Processing of personal data *Art. 6-11*

Collection

For specific, explicit, legitimate purpose

Process

Compatible with purpose

Maintenance

Up-to-date
Kept for as long as necessary

Data subject rights *Art. 33-34*

Collection

Informed consent
prior to collection or process

Process

Maintenance

Correct or delete their data

Data subject rights

Art. 36

Collection

Informed consent
prior to collection or process

Process

Responsibility of responsible party

Maintenance

Correct or delete their data

Implementation in the RIPE Database

RIPE Database

Personal data

Info relating to identified or identifiable person

Processing of personal data

Collecting, storing, modifying, publishing, deleting etc.

Responsible party

The person that determines the purpose and means of processing

Data subject

The person that personal data relates to

RIPE Database

Personal data

Contact details of
individuals

Processing of
personal data

Collecting, storing,
modifying, publishing, deleting etc

Responsible party

The person that determines the purpose
and means of processing

Data subject

The person that personal data relates to

RIPE Database

Personal data

Info relating to
identified or identifiable person

Processing of
personal data

Purpose of the process?

Responsible party

The person that determines the purpose
and means of processing

Data subject

The person that personal data relates to

RIPE Database

Personal data

Info relating to

identified or identifiable person

Processing of
personal data

*Communication among
operators in case of
troubleshooting, abuse etc.*

Responsible party

The person or organization
responsible for the data and means of processing

Data subject

The person that personal data relates to

RIPE Database

Personal data

Info relating to identified or identifiable person

Processing of personal data

Collecting, storing, modifying, publishing, deleting etc

Responsible party

The person that determines the purpose and means of processing

Data subject

The person that personal data relates to

RIPE Database

Personal data	Info relating to identified or identifiable person
Processing of personal data	Collecting, storing, publishing, deleting etc
Responsible party	The controller of the data
Data subject	The person that provides the data

Purpose determined by RIPE community!

RIPE NCC has limited control over the data

RIPE Database

Personal data

Info relating to identified or identifiable person

Processing of personal data

Collecting, storing, modifying, publishing, deleting etc

Responsible party

The

“mnt-by:”

se

Data subject

The person that personal data relates to

RIPE Database

Personal data

Info relating to identified or identifiable person

Processing of personal data

Collecting, storing, modifying, publishing, deleting etc

Responsible party

The person that determines the purpose and means of processing

Data subject

T

Rights of individuals?

to

RIPE Database - Data subject rights

Collection

For specific, explicit, legitimate purpose

Process

Compatible to purpose

Maintenance

Up-to-date
for as long as necessary

RIPE Database - Data subject rights

Collection

Purpose specified in the RIPE Database T&Cs

Process

Users agree to processing in accordance to T&Cs

Maintenance

Up-to-date
for as long as necessary

RIPE Database - Data subject rights

Collection

For specific, explicit, legitimate purpose

Process

Compatible to purpose

Maintenance

Data removal procedure

**Unlimited
access?**

Unlimited Access to the RIPE Database

Unlimited access to the database
=
Unlimited access to personal data

Justified by the purpose?

NO

Unlimited Access to the RIPE Database



Unlimited access restrictions

Acceptable Use Policy

Limit to results with personal data

NRTM / Bulk Access

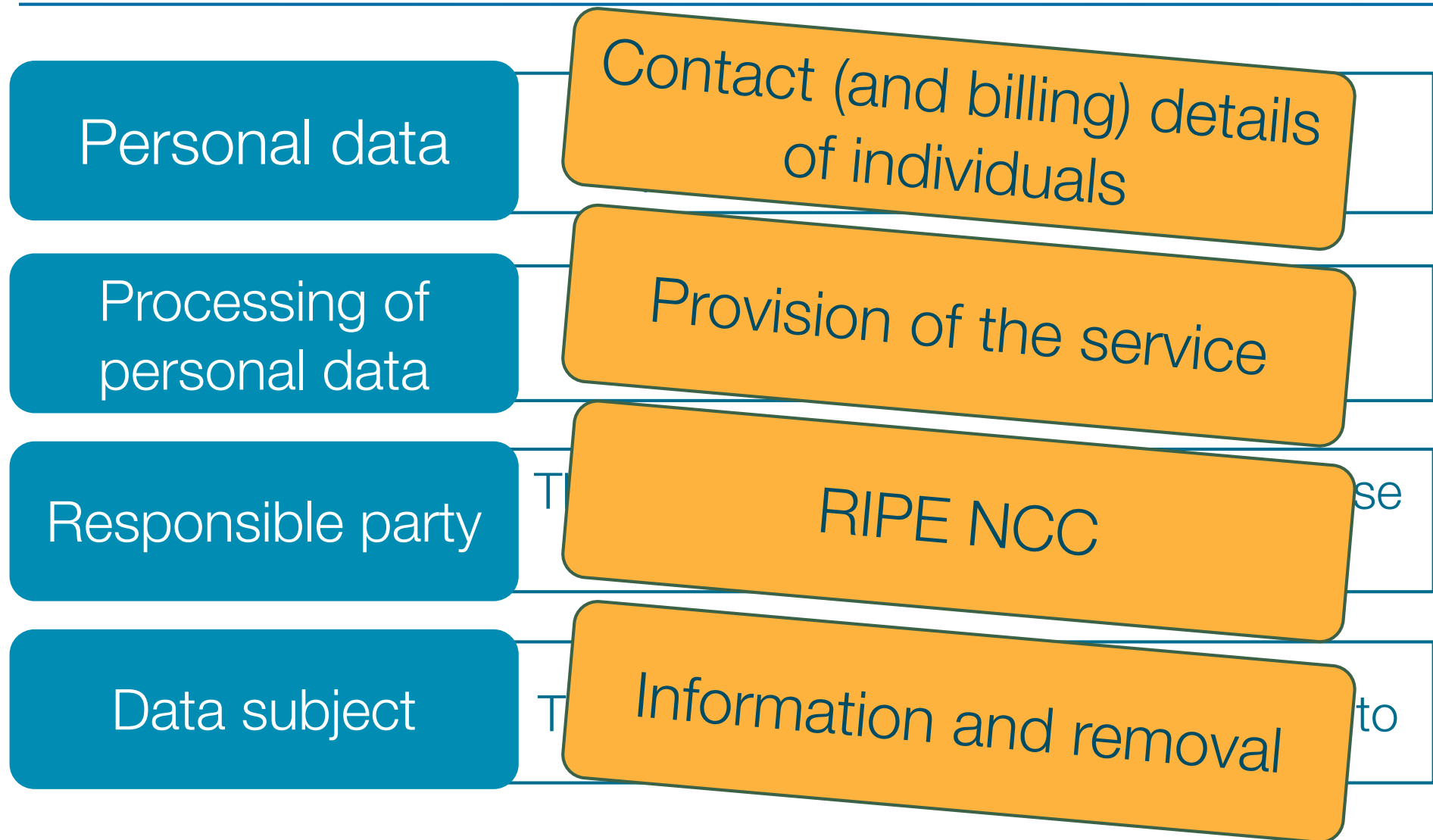
Available without personal data

Implementation in other RIPE NCC Services

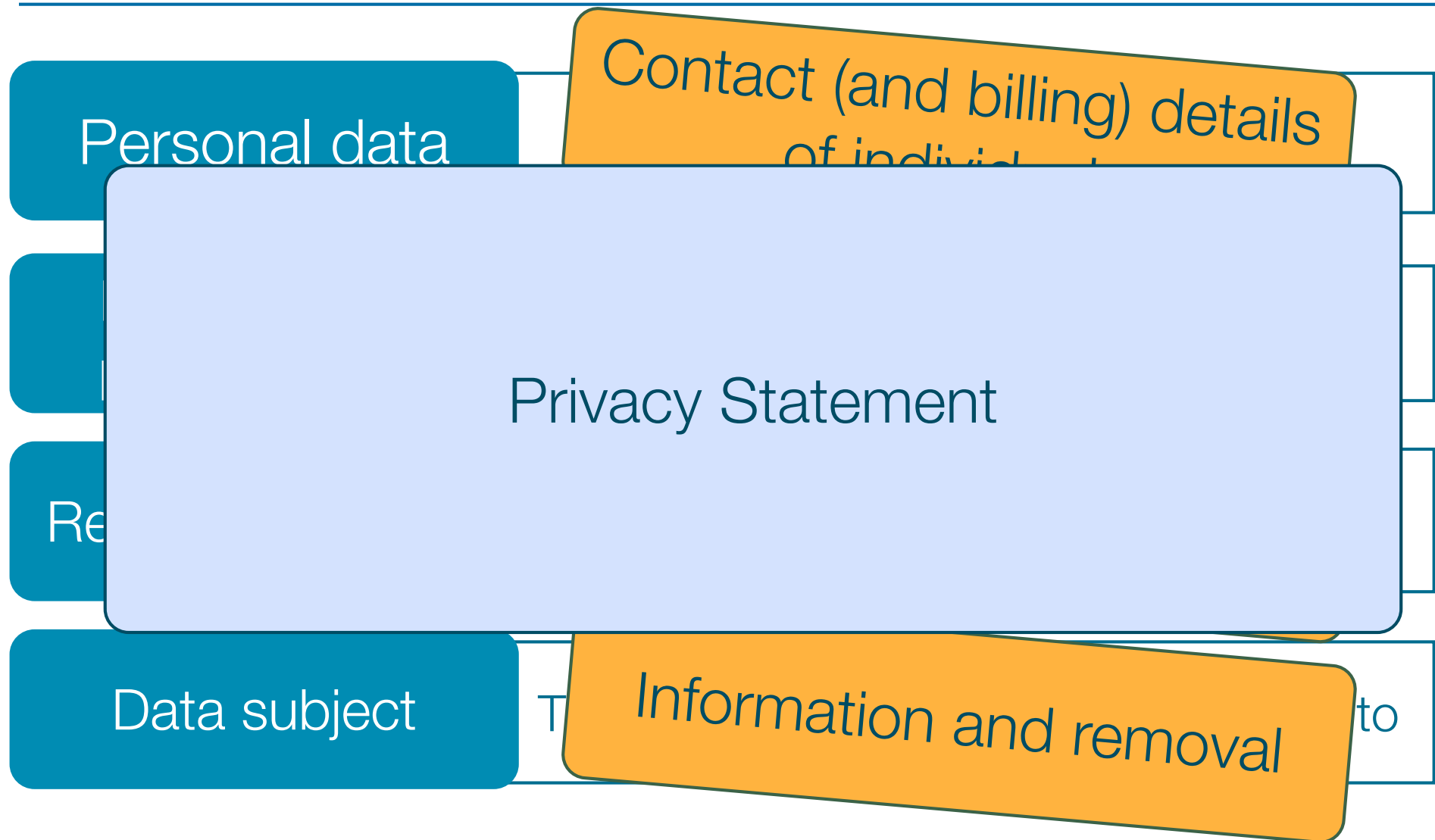
Data Protection in other RIPE NCC services

- Services such as:
 - Members only services (allocation of resources, LIR portal etc)
 - Registration to courses, meetings
 - Subscription to mailing lists

Other RIPE NCC services



Other RIPE NCC services



In short

- The report presents an analysis of
 - Framework
 - Implementation
- The report is dynamic
 - Will be updated with new rules
 - Cookie law
 - New Data Protection framework expected

Questions?

