Data Protection Task Force update

Jochem de Ruig
Member of DP-TF
Relevance of Data Protection

• Data protection is becoming more of an issue
• Data protection authorities are taking steps against Data Controllers
• Data Controllers responsible to protect online privacy
• See this example from Herald Tribune of this weekend
Introduction

• Who is involved
  Manfredo Miserocchi (Chair), Janos Zsako, Wilfried Woeber, Richard Cox, Elmar Bins, Larissa Yurkina, Jochem de Ruig and Denis Walker

• Chair of the TF – Manfredo Miserocchi

• Schedule for meetings
  – First meeting Monday 7th May Tallinn
  – Second meeting 18th July
  – Third meeting 22th October
  – Next meetings: start February 2008 and RIPE56

• E-mail communication: dp-tf@ripe.net
Focus on 3 main areas

1. Set up legal framework to comply with Data Protection regulation
   - RIPE NCC privacy statement
   - General Terms and Conditions for all services
   - RIPE Database Terms and Conditions

2. New Policies to support Data Protection framework
   - Mandatory “Mnt-by:”
   - Clean up of unreferenced objects
   - New procedure to remove/change personal data from the RIPE DB

3. Bulk access - mirroring, Near Real Time Mirror (NRTM)

Discussion on: “What personal data needs to be in the RIPE DB?”
Set up legal Data Protection framework

- Responsibility of RIPE DB with RIPE NCC, the Data Controller
- Delegated responsibility to maintainer:
  - To notify individuals of registration in RIPE DB
  - To make sure the data is accurate
  - To support removal/changes in personal data
- The Data Controller needs to audit the personal data
- Legal framework structure - finished
- Privacy statement - draft
- General Terms and Conditions - draft
- Purposes of RIPE DB - draft
- RIPE DB Terms and Conditions - under construction
New Policy proposals

- Mandatory “mnt-by:” to guarantee ownership of records
- Clean up of unreferenced objects (0.5 million objects)
- Procedure for change/removal of personal data
- Structure address field to allow non personal data access
- Provide opt in “white page” facility within RIPE Database for industry related persons
Bulk access – mirroring, NRTM

- Reviewed current list only a few are using NRTM
- Several existing mirrors – other RIRs
- NRTM only possible on case by case basis:
  - Possible uses are: research, security providers and possibly IP country mapping
- NRTM sign standard contract based on EU model contract
- Outside EU countries request permit from minister of Justice
- NRTM option with personal data filtering
- Publish all granted NRTMs
Work in progress - Action items for the DP-TF

- Continue working on the legal structure and documents
- Propose a definition for term End User
- Investigate the source of creation of unreferenced objects
- Investigate use of maintainers within DB, mnt not referenced to an Internet Resource
- Finalise new NRTM contract, re-sign NRTMs when needed
- Discuss alternatives to mirroring with other RIRs
Questions?