

# Data Protection Task Force update

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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 7<sup>th</sup> May Tallinn
- Second meeting 18<sup>th</sup> July
- Third meeting 22<sup>th</sup> October
- Next meetings: start February 2008 and RIPE56

- E-mail communication: [dp-tf@ripe.net](mailto: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?