



RIPE NCC

RIPE NETWORK COORDINATION CENTRE

Legal Update on NWI-13 and NWI-2

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RIPE Database - Main Principles (I)



- It is meant to contain **specific information** for the **purposes** that are **defined** in the RIPE Database Terms and Conditions
- If **new** sets of data is required to be provided, this must serve the **purposes** for which the RIPE Database contains information
 - If the purposes have changed, establish this via community consensus and get this documented
- If **new** types of **personal data** is requested to be inserted, additional legal checks are required; i.e. Is this new processing **necessary** for the purposes of the RIPE Database and can it be considered in line with the GDPR principles?
 - If the purposes have changed, establish this via community consensus and get this documented before the processing takes place

RIPE Database - Main Principles (II)



- Why is this review necessary?
 - Ensure the RIPE Database contains only (personal) data required for its defined purposes; see also the data minimisation principle recommended by the RIPE Database Requirements Task Force (DBTF)
 - Avoid that personal data for which there is no justification will not be processed in the RIPE Database
 - Limit GDPR and liability exposure of the RIPE NCC; Shared responsibilities between the RIPE NCC and the party inserting the data in the RIPE Database as data co-controllers



NWI -13 Geofeed Attribute



NWI-13 Introduction

- **Request:** Create the “geofeed:” attribute in the RIPE Database
- **Goal:** *‘Correlating geographical information with IP addresses.....helps answer Geo IP queries’*
- **How:** By adding a new attribute "geofeed: url"
- It is already used in the "remarks: geofeed: url" attribute
- Question raised to RIPE NCC Legal:
 - ➔ Can the geofeed location data be considered as personal data under GDPR?

NWI-13 Legal Analysis



- Legal Review Impact Analysis (November 2021):
 - ‘... if the geofeed attribute is inserted for registrations of assignments that are reasonably assumed to be related to one individual user, then the attribute will be considered personal data....’
- Defined purposes do not justify processing of personal data for geolocation reasons
- Restrictions required to be implemented to avoid the processing of unnecessary personal data

NWI-13 Suggested Restrictions



- Advice to implement restrictions based on specific size
- Concerns were raised - there were drawbacks to this approach
- New technical implementation to satisfy the legal advice and address legal concerns: Restrict by status

Other DB Geolocation Attributes



- Geoloc attribute
- Country code in ORGANISATION object
- Country code in resource objects

Is geolocation a new purpose?



- **Current** purposes justify only for *‘scientific research into network operations and topology’*
- The DBTF recognised there is an active user group for geolocation information, however, geolocation is not a purpose of the RIPE Database
- Has this changed?
- If yes, re-evaluate the situation and need for restrictions



NWI-2 Displaying history of objects where available

Deleted objects

NWI -2 Introduction (I)



- Recommended changes:
 1. Drop restriction of most recent deletion point
 2. Allow access to history of deleted objects
- Scope of this change is not clearly defined, however, from the discussions it seems that:
 - Being able to view who was the holder of certain resources at a specific point seems to be the main argument supporting this change
 - ORGANISATION and resource objects seem to be the most relevant here

NWI-2 Legal Analysis



- Resource holders may be natural or legal persons
- Privacy concerns kick in for:
 - Resource holders natural persons
 - Appointed contact persons of resource holders legal persons
 - Information inserted in the free text attributes e.g. descr., remarks, address, email
- If personal data is part of a deleted object, there must be a purpose justifying the need to still display it in the RIPE Database
- Current purposes do not provide this justification
- Filtering rules would have to be applied to avoid the processing of unnecessary personal data

NWI-2 and Other Historical Information



- Historical queries on certain objects are allowed
- Filtering rules in place to avoid the processing of any unnecessary personal data
- The DBTF recognised historical data as a requirement and made the following recommendations:
 - Access to historical data should be limited to what is necessary to fulfil the RIPE Database's purposes
 - Community to consider the criteria under which access to a wider set of historical data may be granted for research purposes
 - Community to consider how to easily demonstrate the holdship changes of IP blocks that have been split or merged

RIPE Database Historical Information



- Is it still a requirement of the RIPE Database to provide historical information of resource holders?
- Clearly define what is the requirement and what is in scope:
 - Is it part of this requirement to be able to see the full history of an object even when this was deleted?
 - Which objects are in scope?
 - Are all attributes of these object types necessary to be provided?



Questions



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