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PERSON objects in the RIPE Database

The Issue

- There are 2+ million referenced PERSON objects, with 8+ million total objects

- 23% of RIPE Database is personal data

- There are also about 104k ROLE objects, some may contain personal data

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Justification for storing personal data

- T&C define one purpose of Database as facilitating contact for operational issues

- Address policies require contact details for resource holders and
- some end users of public address space

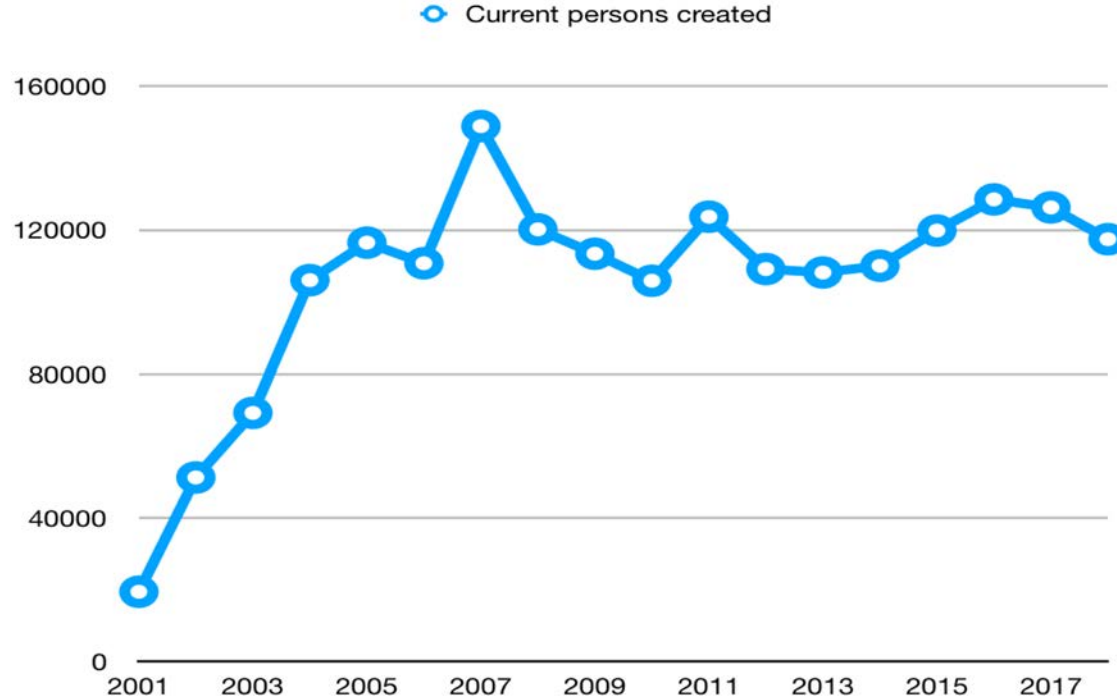- Address policies acknowledge privacy concerns

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Who are these people?

- About 1.5m have a single reference from INET(6)NUM objects
  - these may be tech contacts
  - or could be customers with assigned address space

- Half a million have same name/phone, probably duplicates

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Creation

- There has been a steady creation rate for about 15 years

Email addresses

- There are about 100k unique email addresses in various notification attributes

- These may also be a mix of personal and corporate data

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Is there a problem?

- From the analysis I've done so far it is not possible to identify how much of
- this personal data can be justified

- Maybe 90% is justified, or perhaps only 20%

- With general EU privacy laws and GDPR in particular,
- does this give (someone?) a legal problem?

- Who is accountable for this personal data being in the database?

- If the justification for this data being in the database is questioned,
- who will take the responsibility for answering that question?

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What is a contact?

- Original Database design intended PERSON objects to be mainly referenced
- from ROLE objects, all other objects to reference the ROLE objects

- This wasn't enforced by the software

- Historically most users ignored ROLE objects in favour of PERSON objects

- MNTNER objects cannot be created without a PERSON object

- No where is it documented that PERSON objects
- should contain business data

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What is a contact?

- "abuse-c" was specifically designed to enforce the use of ROLE objects

- ROLE objects no longer need to reference PERSON objects

- Why can't most contacts be roles?

- Should the software (finally) enforce that?

- What information is needed from a contact?

- Can we justify storing personal data for a contact
- if no personal data is needed?

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Distribution

- How are these 2m PERSON objects linked to organisations?

- No apologies for the dryness of these numbers

- They need to be seen as they are quite surprising

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Organisations with 100k+ PERSON objects

- 3 Telekom companies totaling 856k

- Top organisation has 613k PERSON objects
  - 5 x what next 2 organisations have
  - 10 x what most other Telekom organisations have

- Why?

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Organisations with 5k to 50k PERSON objects

- After the top 3 there is a drop to around 50k

- 43 organisations totalling 704k PERSON objects

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Who are these organisations?

- Summarising the organisations with 5k+:

- 46 organisations
  - 35 telekom
  - 7 service providers
  - 4 others
- Totalling 1.56m PERSON objects

- 110 organisations between 1k and 5k, totalling 230k PERSON objects

- Everyone else totalling 233k PERSON objects

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What next?

- We still don't know if these people are contacts

- We still don't know if these PERSON objects contain
- personal or business data

- Contact details not changed in 20 years (address, fax-no?)

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Questions?