Unique identifier:	AFPUB-2012-GEN-002-DRAFT-01
Draft Policy Name:	Regional Internet Registry Privacy
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Submission Date:	May 5 2012
Related Policies:	None
Obsoletes:	None
Amends:	None

1.Summary

Privacy is the ability of an individual to be left alone, out of public view,and in control of informati on about oneself.

This document specifies the privacy policy for the Regional Internet Registry handling Internet n umber resources in the AfriNIC service region.

2. Introduction

Privacy is the ability of an individual to be left alone, out of public view, and in control of informat ion about oneself.

AfriNIC, as a Regional Internet Registry, manages and administers Internet number resources f or the AfriNIC service region. It publishes information about Internet number resources on the Internet. This document specifies the privacy policy for the Internet Registry. Any restriction mentioned in this document is not applicable to data which is publicly available, e.g. data provided through a service accessible anonymously over the Internet.

3. Data Minimization

The principle of data minimization has been adopted to limit the collection and/or transfer of Personal Identifiable Information (PII) to what is directly relevant and necessary for specified, explicit and legitimate purposes. Information about whether any data is adequate, relevant and not excessive in relation to the purposes for which it is collected and/or transferred shall be made available to any person who is part of the Policy Development Workin g Group for the AfriNIC service region.

The Regional Internet Registry shall not collect under any circumstances Personal Identifiable Information from an applicant of Internet number resources which can be used to identify more than a quarter of the users to which an applicant has allocated IP address space. This is a maximum amount and not guidance about the amount of data considered as excessive.

3.1. Data Retention

The retention period for Personal Identifiable Information is three months. Personal Identifiable I nformation necessary for financial purposes; e.g.
billing, can be retained for up to twelve months after the end of a Registration Service Agreement.
Personal Identifiable Information published for Internet number resources allocations or assignments can be retained for the historical record if the data was publicly available for at least a month.

3.2. Transfer of Personal Identifiable Information

Personal Identifiable Information cannot be transferred to another country unless there is a publicly available assessment of:

a. The nature of the Personal Identifiable Information

b. The purpose and duration of the proposed processing of the Personal Identifiable Information

c. The country of origin and country of final destination

d. The rules of law in force in the country in question e.
Any relevant rules and security measures which are complied with in that country

3.3 Personal Identifiable Information Transfer Register

A Personal Identifiable Information Transfer Register will be maintained with the following inform ation:

a. Date of transfer of the Personal Identifiable Information

b. Nature of the Personal Identifiable Information

c. Purpose of the proposed processing of the Personal Identifiable Information

d. Country of origin and country of final destination

The Personal Identifiable Information Transfer Register shall be published through a service accessible anonymously over the Internet. Personal Identifiable Information required for financial purposes is exempted from publication.

4. Personal Identifiable Information Leakage

In the event of Personal Identifiable Information leakage, a notification shall be sent to the Resource Policy Discussion mailing list within a day of the detection of the leakage together with an explanation about the nature and extent of the leakage.

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