

Privacy Policy For Public IP Addresses (APNIC)

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1 Introduction

In order to assign and manage Internet Resources such as IP addresses and AS-Numbers, Arelion in some cases needs to collect and share personal data. We recommend you to read the privacy information below.

Please note <u>that resource holder (Customer)</u> is <u>responsible</u> to ensure that all individuals whose personal data is provided to Telia are sufficiently informed beforehand about their data collection and shAPNICg, as well as about their privacy related right as required by applicable data protection laws.

Why do we need to collect, store and publish personal data?

We are the responsible Internet Registry and thus we validate the IP request, manage and update any related records in relevant databases, in this case the APNIC Database (Whois).

As a Local Internet Registry, Arelion in some cases needs to collect and store personal data (contact details) as part of the service to provide Internet number resources (e.g. IP addresses and AS numbers), that includes managing orders and solving service related incidents, based on performance of contract.

As a Local Internet Registry, Arelion is obliged to follow the <u>APNIC Policies</u> when managing Internet Resources such as IP addresses and AS Numbers and to share some data with <u>APNIC</u>. That is based on Arelion's legitimate interest to provide to its customers quality services that comply with APNIC policies.

Arelion may also store some personal data of the resource holder's contact persons based on Arelion's legitimate interests to fight fraudulent behavior and for legal defense purposes.

The resource holder is responsible to ensure that the data they provide to Arelion is accurate and collected lawfully, also that contacts persons those personal data is provided to Arelion are properly informed about this and their related privacy rights. Arelion will delete the personal data on request from the resource holder as described in the Section 5 below.

3 What is APNIC and how is the APNIC Database (Whois) used?

<u>APNIC</u> Database = Regional Registry <u>APNIC Community</u> = Internet Community

APNIC acts as the Regional Registry for Internet number resources in Europe and therefore manages the operations of the public APNIC Database (the so called Whois). All Internet Resource assignments must be registered in the public APNIC database together with contact details of the End User.

This function is crucial for the operations of the Internet globally. It ensures the uniqueness of the Internet number resources used in the public network, which is essential for the Internet to function properly. Publishing registration information in the APNIC Database (Whois) also ensures transparency around the proper distribution of Internet number resources. The APNIC Database contains information e.g. to facilitate co-ordination between network operators (network problem resolution, outage notification etc.) and this purposes justifies the publication of personal data in the APNIC Database (Whois).

Moreover, having contact details of individuals responsible for specific Internet number resources, or that provide technical support to the corresponding networks, facilitates Internet co-ordination and is crucial when something goes wrong. As one of the purposes of the APNIC Database (Whois) is to provide information related to the resource holder, the APNIC community has concluded that an individual maintaining an Internet number resource cannot be anonymous.

4 What Data is stored/published in the APNIC Database?

The publicly available APNIC Database contains registration details of Internet number resources (IP addresses and AS Numbers) and, in particular, information about the organizations or persons (e.g. sole traders) that hold Internet number resources, including their contact details. Also contained are the contact details of people responsible for the networks that Internet number resources correspond to and/or those responsible for maintaining the information in the APNIC Database.

These are usually the technical and administrative employees of the natural or legal persons that hold the resources (e.g. the IP addresses). The contact details of a resource holder and their appointed contact persons consist of names, (business) email address, (business) phone numbers, and (business) postal addresses.

The resource holder is responsible for making sure that all contact details are updated at all times.

5 How long do we store the data?

Arelion stores personal data as long as the Internet Service from Arelion, entitled to these resources is active and at the longest up to three (3) years after terminated Service, e.g. any IP Connect Service entitled to fixed public IP addresses.

6 Where does Arelion store and process the personal data?

Arelion stores and processes personal data in Sweden when administrating this service.

7 How to correct and/or remove personal data?

If the Resource holder's contact persons want their data to be removed from the Arelion internal systems or APNICs database, the Resource holder can contact us via email ipregistry@arelion.com or via general customer support channels (see more details on this in the section 7 below).

Please note that in such a request the Resource holder is responsible for providing another person's contact details before the request can be handled. If the up-to-date contact details are not provided, the resources may be deregistered and retrieved by Arelion.

8 Are privacy concerns taken into account in the APNIC Database (Whois)?

Privacy concerns are taken into account by the APNIC community. You can read about that more on the APNIC Website.

9 How Does Arelion protect personal data?

Please read more how Arelion protect personal data and how to contact Arelion here:

https://www.arelion.com/legal/privacy-policy.html