

DATE

VERSION

Background

REANNZ collects data relating to the use of the network as part of prudent business practice, for the purpose of monitoring and improving network performance, measuring network performance and usage, troubleshooting network issues, performing network diagnostics, network management, network security and for reporting network usage and trends.

December 2012

1.0

Purpose

This policy outlines the ways REANNZ collects data about the operation of the network and how this information is used, disclosed and stored. It is intended to ensure REANNZ manages this information in compliance with REANNZ'S Privacy Act obligations.

The Member must ensure that this policy is made available to all users accessing the network through the Member's connection. The policy is available on the REANNZ website: http://www.reannz.co.nz/about-reannz/publications#policies

Scope

This Policy applies to network measurement undertaken by REANNZ and to third parties engaged by REANNZ to perform network measurement on REANNZ's behalf.

Definitions

"Raw Traffic Data" is the raw data about the operation of the network including information identifying the apparatus and/or location from which each transmission is sent and received and the network level characteristics of each transmission (such as its direction, point of termination, time, duration, size, etc). It does not include the contents of information or communications transmitted over the network. For example, Raw Traffic Data would include the IP address of the member institution or the IP address of any machine within a member institution but not the payload, e.g.: the contents of the email sent or science data transferred.

"Processed Traffic Information" is aggregated or other information that REANNZ creates using Raw Traffic Data. It may take many forms including (but not limited to) tables, graphs, pictorials and written documentation. It does not include the contents of information or communications transmitted over the network. For example, REANNZ may produce tables or graphs showing network usage at various times.

"Deep Packet Inspection Data" is the Raw Traffic Data and information about the contents of information or communications being transmitted over the network (the Payload), collected via deep packet inspection.

"Network Information" means all information collected or used by REANNZ in respect of operation, measurement and maintenance of the network, including Raw Traffic Data, Processed Traffic Data and Deep Packet Inspection Data.

"Accredited Network Researcher" means a researcher who meets the accreditation criteria, which may require confidentiality and other undertakings, as set by REANNZ from time to time.

Collection of Network Information

- 1. REANNZ collects Raw Traffic Data in respect of all transmissions over the network and may create Processed Traffic Data using all or any part of the Raw Traffic Data collected.
- REANNZ will not collect any Deep Packet Inspection Data or otherwise sample, collect or inspect the contents of any packets of information sent across the network, except as set out in accordance with the clause "Deep Packet Inspection Data" below.

Use of Network Information

- 3. REANNZ collects and uses Network Information for the following purposes: monitoring and improving network performance, measuring network performance and usage, troubleshooting network issues, maintaining the network and/or REANNZ's service to members, performing network diagnostics, network management, network security and for reporting network usage and trends.
- 4. REANNZ will not make Raw Traffic Data available publicly, except as required by applicable law or in the form of Processed Traffic Information in accordance with clauses five and six below.
- 5. REANNZ may make Processed Traffic Information publicly available or include it on its website, such as via the network weathermap, from time to time in accordance with clause six below.

- 6. REANNZ will take all reasonable steps in line with good industry practice to ensure that any Processed Traffic Information published does not include information which identifies:
 - a. end user IP addresses of any particular member;
 - b. the destination of an individual members' traffic; or
 - c. the application type of an individual members' traffic;

without the individual Members' consent.

- 7. REANNZ may provide copies of anonimised Raw Traffic Data and Processed Traffic Information Data to Accredited Network Researchers for the purpose of supporting network research.
- 8. If any Raw Traffic Data held by REANNZ amounts to personal information about an individual (for example, should an IP address amount to personal information), that individual can request access to it by contacting info@reannz.co.nz.
- 9. Generally REANNZ does not make Network Information available to third parties for use for their purposes, except as expressly outlined in this policy. However, REANNZ may disclose Network Information:
 - to service providers working with us to provide or maintain the network or assist in the operation of our business to the extent they have a "need to know";
 - e. a party in relation to the purchase or acquisition of our business or assets; and
 - f. where required by applicable law or any court, or in response to a request from a legitimate law enforcement agency.

Storage

- 10. REANNZ will maintain appropriate technical and organisational security measures to protect the Raw Traffic Data and any Deep Packet Inspection Data and limit access to only those persons who have a "need to know" for the purposes for which it was collected.
- 11. Raw Traffic Data will be held by REANNZ for no longer than required for the purpose for which it is collected.

Deep Packet Inspection Data

12. REANNZ does not routinely collect Deep Packet Inspection Data. It is only collected on a case by case basis where:

- a. a performance or maintenance issue or security threat has been identified on the network which requires further inspection to resolve, or
- it has been requested in writing by an authorised representative of a Member, confirming that the Member is permitted under applicable law to carry out such inspection, and
 - i. The deep packet inspection is requested by that member for a short term and legitimate, identified purpose, and
 - ii. Deep packet inspection is limited to the traffic of that member, or
- c. it is requested by a court or a legitimate law enforcement agency or otherwise required under applicable law.
- 13. Unless it would prejudice the purpose for which the Deep Packet Inspection Data is being collected or REANNZ is required by applicable law not to, REANNZ will inform the Member in respect of any Deep Packet Inspection Data being collected directly in respect of a Member's connection before the collection of this data commences.
- 14. In the case of clause 12(b), Deep Packet Inspection Data will only be made available to the member organisation who made the request.
- 15. In the case of clause 12(c), Deep Packet Inspection Data will only be provided to the authorities involved (for example the police).
- 16. Deep Packet Inspection Data will only be kept by REANNZ for as long as required for the particular purpose for which it is collected in each case. Once it is no longer needed for that purpose it will be deleted by REANNZ.

Review

17. This Policy will be reviewed at least every two years by the Measurement and Monitoring Working Group.

Version control

VERSION	PUBLISH DATE	REASON FOR UPDATE
0.4	21 Nov 2012	Final draft incorporating Monitoring and Measurement Group Feedback
1.0	13 Dec 2012	REANNZ Board Approved.