ICANN Purpose: Provide mechanisms for safeguarding Registered Name Holders' Registration Data in the event of a business or technical failure, or other unavailability of a Registrar or Registry Operator
(Purposes by Actor (E))(TempSpec - 4.4.11)

Lawfulness of Processing:

Art. 6.1(b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Art. 6.1(f): processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Art. 6.1(a): Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Data Elements Collected or Generated - Pre GDPR	Fields to be Collected	Lawfulness of Processing Questions
Source: Registrar Data Escrow Specifications		**1) If the purpose is based on an ICANN contract, is this lawful as tested against GDPR and other laws?**
Domain Name	1	Yes, as escrowing the data is supported by ICANN's mandate to provide for security and stability in the DNS and this purpose is primarily protecting the registrant's rights.
Registry Domain ID	-	
Registrar Whois Server	-	
Registrar URL	-	
Updated Date	-	
Creation Date	-	**2) Is the purpose in violation with ICANN's bylaws?**
Registry Expiry Date	-	
Registrar Registration Expiration Date	1	No.
Registrar	-	1.1(a)(i) Coordinates the allocation and assignment of names in the root zone of the Domain Name System ("DNS") and coordinates the development and implementation of policies concerning the registration of second-level domain names in generic top-level domains ("gTLDs"). In this role, ICANN's scope is to coordinate the development and implementation of policies:
Registrar IANA ID	-	
Registrar Abuse Contact Email	-	
Registrar Abuse Contact Phone	-	
Reseller	-	
Domain Status	-	
Registry Registrant ID	-	
Registrant Fields		
• Name	1	• For which uniform or coordinated resolution is reasonably necessary to facilitate the openness, interoperability, resilience, security and/or stability of the DNS including, with respect to gTLD registrars and registries, policies in the areas described in Annex G-1 and Annex G-2; and
• Organization (opt.)	-	
• Street	1	
• City	1	
• State/province	1	
• Postal code	1	• That are developed through a bottom-up consensus-based multistakeholder process and designed to ensure the stable and secure operation of the Internet's unique names systems.
• Country	1	
• Phone	-	
• Phone ext (opt.)	-	
• Fax (opt.)	-	The issues, policies, procedures, and principles addressed in Annex G-1 and Annex G-2 with respect to gTLD registrars and registries shall be deemed to be within ICANN's Mission.
• Fax ext (opt.)	-	
• Email	-	**3) Data Required for purpose of whom?**
2nd E-Mail address	-	ICANN and Registrars
Admin ID	-	
Admin Fields		
• Name	1	**4) Is the processing necessary to achieve the purpose?**

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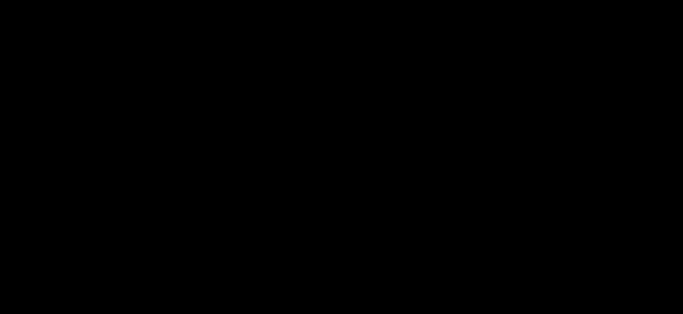Art. 6.1(a): Consent - the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Data Elements Collected or Generated - Pre GDPR	Fields to be Collected	Lawfulness of Processing Questions
• Organization (opt.)	-	While all contracted parties that have to be compliant with GDPR need to make sure there are protections against data loss and mechanisms to enable swift data recovery, ICANN is operating at the global level where customers can register domain names with registrars globally and the registry operators are based in numerous jurisdictions, it is important to have interoperability of escrow agents. Requiring all contracted parties to use the same policies for both escrowing data and applying the same standards to escrow agents for making data available, is necessary for contingency planning at the global level.
• Street	1	
• City	1	
• State/province	1	
• Postal code	1	
• Country	1	
• Phone	1	
• Phone ext (opt.)	-	
• Fax	1	
• Fax ext (opt.)	-	
• Email	1	
Tech ID	-	**5) Do Data Elements require transfer to meet the purpose? (Charter Questions 2c, 2d, 2e, 2i)**
Tech Fields		
• Name	1	Yes, the data must be transferred to the Data Escrow provider in order to satisfy off-site data storage. In the event of failure and attempts to restore service, the data is also transferred to the Gaining Registrar.
• Organization (opt.)	-	
• Street	1	
• City	1	
• State/province	1	**6) Publication of data by Registrar/Registry required to meet the purpose? (Charter Question 2f)**
• Postal code	1	
• Country	1	Data is not made public for escrow purposes, but a transfer to the escrow agent and - in case of contingencies - the transfer to a gaining registrar is required to ensure that operations are not impaired.
• Phone	1	
• Phone ext (opt.)	-	
• Fax	1	
• Fax ext (opt.)	-	**7) Are there any "picket fence" considerations related to this purpose?**
• Email	1	
NameServer(s)	1	None.
DNSSEC	-	
Name Server IP Address	-	**8) What are the data retention requirements to meet the purpose? (Charter Question 2g)**
Last Update of Whois Database	-	
Other Data:		From the Escrow Specification (3.3.1.6), deposits to Third-Party Escrow Agents two copies are held for one year.
• Field 1	-	
• Field 2	-	
• Field 3	-	

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Data Elements Collected or Generated - Pre GDPR	Fields to be Collected	Lawfulness of Processing Questions
• Field 4	-	**9) Additional information needed to adequately document the purpose?**
• Field 5	-	None.

Chain of Custody:
- Registrar Data Escrow Program: https://www.icann.org/resources/pages/registrar-data-escrow-2015-12-01-en
    - Data Fields Source: https://www.icann.org/en/system/files/files/rde-specs-09nov07-en.pdf
- Temp Spec: Section 5.3, Appendix B