

**Proposed SSAD User Groups:**

- Registrants
- End-users
- EU Law Enforcement
- Non-EU Law Enforcement
- Intellectual Property
- Commercial
- Security Researcher
- Academic Researcher

| <b>User Group: Registrants</b>   |  |
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| <b>a) User Group General Definition</b>  | Domain name registrant who wants to access his/her own information   |
| <b>b) Criteria to determine whether someone belongs to this user group</b>                                     | Owner of a domain name registration  |
| <b>c) Purposes for requesting data</b>   | <ul style="list-style-type: none"> <li>• To confirm that data related to his/her domain name registration is correct</li> <li>• To make updates to data related to his/her domain name registration</li> </ul> |
| <b>d) Lawful basis for requesting data</b>   | 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            |
| <b>e) Data elements typically necessary for each purpose (to be identified after b) &amp; c) are confirmed</b> |  |
| Other?   |  |

| <b>User Group: End Users</b>   |  |
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| <b>a) User Group General Definition</b>                                    | Individual or organization who consumes or uses a product or service related to a domain name registration   |
| <b>b) Criteria to determine whether someone belongs to this user group</b> |  |
| <b>c) Purposes for requesting data</b>                                     | <ul style="list-style-type: none"> <li>• Report issues with domain name registration or web-site</li> <li>• Know identity of entity managing domain name registration to assess trustworthiness</li> </ul>   |
| <b>d) Lawful basis for requesting data</b>                                 | 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 |

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|  | require protection of personal data, in particular where the data subject is a child. |
| <b>e) Data elements typically necessary for each purpose</b> (to be identified after b) & c) are confirmed |   |
| Other?   |   |

| <b>User Group: EU Law Enforcement</b>  |   |
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| <b>a) User Group General Definition</b>  | Member or employee of confirmed EU Law Enforcement Agency   |
| <b>b) Criteria to determine whether someone belongs to this user group</b>                                 |   |
| <b>c) Purposes for requesting data</b>   | To identify contact point for domain name and to gather investigative leads related to the owner/purchaser of the domain name registration  |
| <b>d) Lawful basis for requesting data<sup>1</sup></b>   | <ul style="list-style-type: none"> <li>• 6(1)e - the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.</li> <li>• 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.</li> </ul> |
| <b>e) Data elements typically necessary for each purpose</b> (to be identified after b) & c) are confirmed |   |
| Other?   |   |

| <b>User Group: Non-EU Law Enforcement</b> |  |
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| <b>a) User Group General Definition</b>   | Member or employee of confirmed Law Enforcement Agency outside of the European Union |

<sup>1</sup> From <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/> "In particular, [in the case of public authorities] you may still be able to consider consent or legitimate interests in some cases, depending on the nature of the processing and your relationship with the individual. There is no absolute ban on public authorities using consent or legitimate interests as their lawful basis, although there are some limitations".

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| <b>b) Criteria to determine whether someone belongs to this user group</b>                                     |  |
| <b>c) Purposes for requesting data</b>   | Investigation of cybercrime or DNS Abuse   |
| <b>d) Legal basis for requesting data</b>  | 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. |
| <b>e) Data elements typically necessary for each purpose (to be identified after b) &amp; c) are confirmed</b> |  |
| Other?   |  |

| <b>User Group: Intellectual Property</b>   |  |
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| <b>a) User Group General Definition</b>  | Individuals or entities representing the interests and positions of the owners of trademarks, copyrights, and other intellectual property rights   |
| <b>b) Criteria to determine whether someone belongs to this user group</b>                                     |  |
| <b>c) Purposes for requesting data</b>   | <ul style="list-style-type: none"> <li>• In order to enable contact with parties using a domain name that is being investigated for trademark/brand infringement or copyright theft.</li> <li>• To combat fraudulent use of registration data by facilitating identification of and response to fraudulent use of legitimate data</li> <li>• To enable identification of domain name Registrants to support trademark clearance (risk analysis) when establishing new brands.</li> </ul> |
| <b>d) Lawful basis for requesting data</b>   | 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.   |
| <b>e) Data elements typically necessary for each purpose (to be identified after b) &amp; c) are confirmed</b> |  |

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| Other? |  |
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| User Group: Commercial  |  |
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| a) User Group General Definition  | Individual or entity with commercial interests in a domain name registration   |
| b) Criteria to determine whether someone belongs to this user group                                 |  |
| c) Purposes for requesting data   | Commercial reasons such as interest in buying domain name registration   |
| d) Lawful basis for requesting data   | 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. |
| e) Data elements typically necessary for each purpose (to be identified after b) & c) are confirmed |  |
| Other?  |  |

| User Group: Security Researchers                                    |  |
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| a) User Group General Definition                                    | Individual or entity involved in DNS research to understand, investigate and address security issues   |
| b) Criteria to determine whether someone belongs to this user group |  |
| c) Purposes for requesting data                                     | <ul style="list-style-type: none"> <li>• Investigating abuse and cybercrime</li> <li>• Addressing abuse and cybercrime</li> <li>• Warn domain name registrant about a security issue with domain name registration</li> </ul>  |
| d) Lawful basis for requesting data                                 | 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. |
| e) Data elements typically necessary for each                       |  |

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| <b>purpose</b> (to be identified after b) & c) are confirmed |  |
| Other?   |  |

| <b>User Group: Academic Researcher</b>   |  |
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| <b>a) User Group General Definition</b>  | Individual or entity involved in academic research   |
| <b>b) Criteria to determine whether someone belongs to this user group</b>                                 |  |
| <b>c) Purposes for requesting data</b>   | Research or study that involves domain name registration information   |
| <b>d) Lawful basis for requesting data</b>   | 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. |
| <b>e) Data elements typically necessary for each purpose</b> (to be identified after b) & c) are confirmed |  |
| Other?   |  |