

COOPERATION ON EPDP

THE ROAD AHEAD

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AGENDA

- Addendum mutual interest items
- The road ahead
- Questions

ADDENDUM MUTUAL INTEREST ITEMS

- Differentiating between natural and legal persons registration data
- Accuracy and WHOIS accuracy reporting system
- Feasibility of unique contacts to have a uniform anonymized email address
- Display of Information of affiliated vs. accredited privacy/proxy providers

DIFFERENTIATING BETWEEN NATURAL AND LEGAL PERSONS REGISTRATION DATA

GDPR protects the processing of the personal data of natural persons

We need to consider

- ❑ The interest of the Internet end-users and their ability to confirm the legitimacy of websites registered by legal persons
- ❑ Burdening the system with unnecessary requests and thus leading to an inefficient system for access/disclosure of none publicly available registration data
- ❑ Wasting the information that we have in relation to the differentiation between the registration data of natural and legal persons
- ❑ The EPDP team needs to define a process for differentiation, implementation could be done in phases

ACCURACY AND WHOIS ACCURACY REPORTING SYSTEM

- ❑ Article 5.d of the GDPR says

personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

- ❑ In relation to whose interest must be taken into account in the accuracy principle, legal advice confirms that the purposes pursued by the controller and the controller's commercial interest would also be relevant when examining accuracy

- ❑ The EPDP Phase 1 Report committed that this issue would be covered

- ❑ Inaccurate data is misleading and is useless information

FEASIBILITY OF UNIQUE CONTACTS TO HAVE A UNIFORM ANONYMIZED EMAIL ADDRESS

- The EPDP suggests a completely anonymized email address where the same string would not be used for multiple registrations by the data subject
- The form of anonymization that the EPDP has considered does not include providing ANY PART of the original address
- Only the Registrar who created the anonymization could associate the new address with the registrant
- The EPDP team needs to define how the registrant can be contactable

DISPLAY OF INFORMATION OF AFFILIATED VS. ACCREDITED PRIVACY/PROXY PROVIDERS

- All domains registered via accredited privacy/proxy services providers will be labeled as such in the domain registration data
- Legal advice supports the display of the affiliated vs. accredited privacy/proxy providers
- Implementation of the Privacy & Proxy Services Accreditation Issue (PPSAI) PDP MUST be completed without delay and the EPDP must make a clear recommendation to that effect

THE ROAD AHEAD

- Aligning efforts so that the identified issues are tackled in the EPDP team Phase II final report

THANK YOU - QUESTIONS?