

gTLD Registration Data Consensus Policy

Comment revision

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Thick Whois

- The EPDP requires that appropriate agreements are in place to allow Thick Whois.
- The Recommended change to the Thick WHOIS Policy effectively eliminates it!

Current Comment

- EPDP recommendation on the transfer of data from registrars to registries makes the implementation of the Thick Whois policy difficult, but it does not make it impossible. This is particularly true for registrations that contain no personal information.

Revised Comment – Thick Whois

The EPDP recommendation on the transfer of data from registrars to registries makes the implementation of the Thick Whois policy difficult, but it does not make it impossible. This is particularly true for registrations that contain no personal information.

Moreover, the recently approved EU NIS2 requires that registries and registrars publish publicly available data, and make available redacted data to legitimate users; AND that registrars and registries cooperate so that data does not need to be collected twice. That implies that if registrars are the prime collector of the data (as they are with gTLDs) that registrars must cooperate and provide registries with the data. NIS 2 notes that this obligation is sufficient legal reason for processing the registration data under GDPR Article 6.1(c).

[NIS 2: Recitals 109-112 and Article 28]