

Registry Operator Purpose: Enabling validation of Registered Name Holder satisfaction (fulfillment) of gTLD registration policy eligibility criteria.
(Purposes by Actor (N))(TempSpec – N/A)

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	<p>The processing activity of collecting and using specific data for registration policy eligibility requirements is lawful under 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 [where the registry operator has adopted specific registration policy eligibility requirements]</p> <p>The processing activity of collecting and using specific data for registration policy eligibility requirements is lawful under 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 [where the registry operator has adopted specific registration policy eligibility requirements]]</p>
Registry Domain ID	1	
Registrar Whois Server	1	
Registrar URL	1	
Updated Date	1	
Creation Date	1	
Registry Expiry Date	1	
Registrar Registration Expiration Date	1	
Registrar	1	
Registrar IANA ID	1	
Registrar Abuse Contact Email	1	
Registrar Abuse Contact Phone	1	
Reseller	1	
Domain Status	1	
Registry Registrant ID	1	
Registrant Fields		
<ul style="list-style-type: none"> • Name 	1	
<ul style="list-style-type: none"> • Organization (opt.) 	1	
<ul style="list-style-type: none"> • Street 	1	
<ul style="list-style-type: none"> • City 	1	
<ul style="list-style-type: none"> • State/province 	1	
<ul style="list-style-type: none"> • Postal code 	1	
<ul style="list-style-type: none"> • Country 	1	
<ul style="list-style-type: none"> • Phone 	optional	
<ul style="list-style-type: none"> • Phone ext (opt.) 	optional	
<ul style="list-style-type: none"> • Fax (opt.) 	optional	
<ul style="list-style-type: none"> • Fax ext (opt.) 	-	
<ul style="list-style-type: none"> • Email 	1	
2nd E-Mail address	optional	
Admin ID	-	
Admin Fields		
<ul style="list-style-type: none"> • Name 	optional	
<ul style="list-style-type: none"> • Organization (opt.) 	optional	
		3a) Description of processing activity
		3b) Responsible Party/Parties
		3a) Processing activity: collecting and using specific data in order to validate RNH satisfaction of registration policy eligibility requirements
		3b) Registry Operator – controller

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Data Elements Collected or Generated - Pre GDPR	Fields to be Collected	Lawfulness of Processing Questions	
<ul style="list-style-type: none"> Street 	optional	Registrar – processor Third-party interests: none identified.	
<ul style="list-style-type: none"> City 	optional		
<ul style="list-style-type: none"> State/province 	optional		
<ul style="list-style-type: none"> Postal code 	optional		
<ul style="list-style-type: none"> Country 	optional		
<ul style="list-style-type: none"> Phone 	optional		
<ul style="list-style-type: none"> Phone ext (opt.) 			
<ul style="list-style-type: none"> Fax (opt.) 	optional		
<ul style="list-style-type: none"> Fax ext (opt.) 	-		
<ul style="list-style-type: none"> Email 	optional	4) Is the processing necessary to achieve the purpose?	
Tech ID	-	Yes. Registry Agreement allows Registry Operators to establish, publish, and adhere to clear registration policies (e.g., Spec. 11, 3(d); Spec. 12; Spec. 13). See also ICANN Bylaws (Art. 1.1(a)(i) and Annex G-2).	
Tech Fields			
<ul style="list-style-type: none"> Name 	optional	Enabling validation of Registered Name Holder satisfaction (fulfillment) of registration policy eligibility criteria introduces innovation and differentiation in the gTLD space.	
<ul style="list-style-type: none"> Organization (opt.) 	optional		
<ul style="list-style-type: none"> Street 	optional		
<ul style="list-style-type: none"> City 	optional		
<ul style="list-style-type: none"> State/province 	optional		
<ul style="list-style-type: none"> Postal code 	optional		
<ul style="list-style-type: none"> Country 	optional		
<ul style="list-style-type: none"> Phone 	optional		
<ul style="list-style-type: none"> Phone ext (opt.) 	-		
<ul style="list-style-type: none"> Fax (opt.) 	optional		
<ul style="list-style-type: none"> Fax ext (opt.) 	-		
<ul style="list-style-type: none"> Email 	optional		5) Do Data Elements require transfer to meet the purpose? (Charter Questions 2c, 2d, 2e, 2i)
NameServer(s)	1		Yes, (a) from Registrar to Registry Operator; and (b) in some circumstances, from Registry Operator to ICANN Compliance. Registry Operators are responsible for enforcement of their registration policies.
DNSSEC	1		
Name Server IP Address	1		
Last Update of Whois Database	1		
Other Data:		6) Publication of data by Registrar/Registry required to meet the purpose? (Charter Question 2f)	
<ul style="list-style-type: none"> Additional data elements as identified by Registry Operator in its registration policy, such as (i) status as Registry Operator Affiliate or Trademark Licensee 	1	No.	

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[.MICROSOFT]; (ii) membership in community [.ECO]; (iii) licensing, registration or appropriate permits (.PHARMACY, .LAW] place of domicile [.NYC]; (iv) business entity or activity [.BANK, .BOT]		7) Are there any “picket fence” considerations related to this purpose?
		Within picket fence.
		8) What are the data retention requirements to meet the purpose? (Charter Question 2g)
		Life of registration.
		9) Additional information needed to adequately document the purpose?
		No.

Chain of Custody:

- TBD
- Temp Spec: N/A