

N

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.

Lawfulness of Processing Test:

Processing Activity:	Responsible Party:	Lawful Basis:
PA1 - Collecting specific data for eligibility requirements	ICANN – joint controller Registry – joint controller Registrar – processor	6(1)(b) (for registries with special eligibility requirements) because it is necessary to collect specific registrant data to confirm the registrant meets the specific requirements of the registration agreement, i.e., registrar needs to verify the registrant is a licensed attorney to register a .abogado string. 6(1)(f) for registries with no special eligibility requirements because additional collection is not necessary to perform the contract. Even if this type of additional collection is a useful part of a customer relationship and is a necessary part of a contracted party's business model, it is not necessary to perform the registration contract itself.
PA2 – [Transfer modelled like Purpose A?]		

Data Elements Collected or Generated - Pre GDPR	Fields to be Collected N-PA1	[Fields to be Transferred N-PA2]	Lawfulness of Processing Questions
Source: RAA			1) If the purpose is based on an ICANN contract, is this lawful as tested against GDPR and other laws?
Domain Name	1	-	
Registry Domain ID	1	-	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]
Registrar Whois Server	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	-	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]]
Registrar Abuse Contact Phone	1	-	
Reseller	1	-	
Domain Status	1	-	
Registry Registrant ID	1	-	
Registrant Fields			
• Name	1	-	
• Organization (opt.)	1	-	
• Street	1	-	
• City	1	-	
• State/province	1	-	
• Postal code	1	-	
• Country	1	-	
• Phone	optional	-	
• Phone ext (opt.)	optional	-	
• Fax (opt.)	optional	-	
• Fax ext (opt.)	-	-	
• Email	1	-	
2nd E-Mail address	optional	-	
Admin ID	-	-	2) Is the purpose in violation with ICANN's bylaws?
Admin Fields			No. This purpose is consistent with ICANN's Mission of coordinating the development and implementation of policies concerning the registration of second-level domain names in gTLDs (Introduction of New gTLDs and Applicant Guidebook), and principles for allocation of registered names in a TLD (Annex G-2)
• Name	optional	-	3a) Description of processing activity
• Organization (opt.)	optional	-	3b) Responsible Party/Parties
• Street	optional	-	3a) Processing activity: collecting and using specific data in order to validate RNH satisfaction of registration policy eligibility requirements
• City	optional	-	3b) Registry Operator – controller Registrar – processor
• State/province	optional	-	Third-party interests: none identified.
• Postal code	optional	-	
• Country	optional	-	

Comment [A1]: Should all of these be marked w/ "1" or "Optional" when this purpose is only for data elements beyond what is normally collected in RDDs? All but the other data should be marked at ""

Comment [A3]: Retained pending 2-4 October EPDP WG legal basis discussion

Comment [A4]: Stronger/more direct basis for ROs

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• Phone	optional	-	<p>4) Is the processing necessary to achieve the purpose?</p> <p>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).</p> <p>Enabling validation of Registered Name Holder satisfaction (fulfillment) of registration policy eligibility criteria introduces innovation and differentiation in the gTLD space.</p>
• Phone ext (opt.)		-	
• Fax (opt.)	optional	-	
• Fax ext (opt.)	-	-	
• Email	optional	-	
Tech ID	-	-	
Tech Fields			
• Name	optional	-	
• Organization (opt.)	optional	-	
• Street	optional	-	
• City	optional	-	
• State/province	optional	-	
• Postal code	optional	-	
• Country	optional	-	
• Phone	optional	-	
• Phone ext (opt.)	-	-	
• Fax (opt.)	optional	-	
• Fax ext (opt.)	-	-	
• Email	optional	-	
NameServer(s)	1	-	<p>5) Do Data Elements require transfer to meet the purpose? (Charter Questions 2c, 2d, 2e, 2i)</p> <p>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.</p>
DNSSEC	1	-	
Name Server IP Address	1	-	<p>6) Publication of data by Registrar/Registry required to meet the purpose? (Charter Question 2f)</p> <p>No.</p>
Last Update of Whois Database	1	-	
Other Data:			<p>7) Are there any “picket fence” considerations related to this purpose?</p> <p>Within picket fence.</p>
• Additional data elements as identified by Registry Operator in its registration policy, such as (i) status as Registry Operator Affiliate or Trademark Licensee [.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]	1	-	
• Field 2	-	-	
• Field 3	-	-	
• Field 4	-	-	
• Field 5	-	-	

Comment [A2]: Illustrative examples of additional data elements collected and validated.

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			<p>8) What are the data retention requirements to meet the purpose? (Charter Question 2g)</p> <p>Life of registration.</p> <p>9) Additional information needed to adequately document the purpose?</p> <p>No.</p>

Chain of Custody:

- TBD
- Temp Spec: N/A