

1. Briefly describe the processing activity
2. What purpose does it relate to?
3. Is the processing **necessary** to perform the registration agreement?
 - a. From a technical perspective?
 - b. Based on a **lawful** ICANN requirement?
4. - If yes, stop here.
 - if no, continue to 5+

5. Is a legitimate interest pursued? By the controller? By a third party?
 - legitimate interest? To be construed broadly.
 - Is the processing necessary?
 - What are the interests of the data subject?
 - Balance!

6. Who is responsible for the processing activity?
 - List the parties!