Suggested Redlines to ensure lawfulness of processing is not limited to Article 6.1.f and thus subject to a balancing test.

# Section 4.4

However, such Processing must be in a manner that complies with the GDPR, including on the basis of a specific identified purpose for such Processing. Accordingly, Personal Data included in Registration Data may be Processed on the lawful bases as scoped in GDPR Article 2 or as enumerated in GDPR Article 6.1, and for at least the following legitimate purposes:

# Appendix A.4.1

**4. Access to Non-Public Registration Data**

4.1. Registrar and Registry Operator MUST provide reasonable access to Personal Data in Registration Data to third parties on the lawful bases as scoped in GDPR Article 2 and as enumerated in GDPR Article 6.1.

# Appendix C.2

**2. Lawfulness of Processing**

For Personal Data Processed in connection with the Registration Data Directory Services, such Processing will take place on the lawful bases as scoped in GDPR Article 2 and as enumerated in GDPR Article 6.1, For other Personal Data collected for other purposes, such Personal Data SHALL NOT be Processed unless a legal basis specified under Article 6(1) GDPR applies.