

ICANN Purpose: Handle contractual compliance monitoring requests, audits, and complaints submitted by Registry Operators, Registrars, Registered Name Holders, and other Internet users.
(Purposes by Actor (F))(TempSpec - 4.4.13, 5.7, Appx C)

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: RAA | | 1) If the purpose is based on an ICANN contract, is this lawful as tested against GDPR and other laws? | |
| Domain Name | 1 | 6(1)(f) | |
| Registry Domain ID | - | | |
| 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 | - | | 2) Is the purpose in violation with ICANN's bylaws? |
| Registrar | 1 | | No |
| Registrar IANA ID | 1 | 3a) Description of processing activity 3b) Responsible Party/Parties 3c) Data Required for purpose of whom? | |
| Registrar Abuse Contact Email | 1 | | |
| Registrar Abuse Contact Phone | 1 | If a contractual compliance complaint is filed, the complainant provides certain information regarding the issue, which may contain personal data. Depending on the nature of the issue, ICANN Compliance may ask the registrar or registry operator for the minimum data needed to investigate the complaint. Compliance may also look at the public WHOIS to supplement its review or processing. For ICANN Contractual Compliance audits, ICANN sends audit questionnaires to registry operators and registrars. In responding to the questionnaire, the registry operator and registrar could include personal data in its responses. Also, as part of registry operator audits, ICANN Contractual Compliance requests escrowed data to cross-reference information between data escrow and zone file and bulk registration data access for a sample of 25 domain names to ensure consistency. | |
| Reseller | 1 | | |
| Domain Status | 1 | | |
| Registry Registrant ID | - | | |
| Registrar Fields | | | |
| • Name | 1 | | |
| • Organization (opt.) | (1) | | |
| • Street | 1 | | |
| • City | 1 | | |
| • State/province | 1 | | |
| • Postal code | 1 | | |
| • Country | 1 | | |
| • Phone | 1 | | |
| • Phone ext (opt.) | (1) | | |
| • Fax (opt.) | (1) | | |
| • Fax ext (opt.) | (1) | | |
| • Email | 1 | | |
| 2nd E-Mail address | - | | |
| Admin ID | - | | |
| Admin Fields | | | |
| • Name | 1 | | |
| • Organization (opt.) | (1) | | |

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|---|------------------------|---|
| • Street | 1 | 4) Is the processing necessary to achieve the purpose? Yes |
| • City | 1 | |
| • State/province | 1 | |
| • Postal code | 1 | |
| • Country | 1 | |
| • Phone | 1 | |
| • Phone ext (opt.) | (1) | |
| • Fax (opt.) | (1) | |
| • Fax ext (opt.) | (1) | |
| • Email | 1 | |
| Tech ID | - | 5) Do Data Elements require transfer to meet the purpose? (Charter Questions 2c, 2d, 2e, 2i) |
| Tech Fields | | Yes. |
| • Name | 1 | 6) Publication of data by Registrar/Registry required to meet the purpose? (Charter Question 2f) No. |
| • Organization (opt.) | (1) | |
| • Street | 1 | |
| • City | 1 | |
| • State/province | 1 | |
| • Postal code | 1 | |
| • Country | 1 | |
| • Phone | 1 | |
| • Phone ext (opt.) | (1) | |
| • Fax (opt.) | (1) | |
| • Fax ext (opt.) | (1) | 7) Are there any “picket fence” considerations related to this purpose? |
| • Email | 1 | No. |
| NameServer(s) | 1 | |
| DNSSEC | 1 | |
| Name Server IP Address | 1 | |
| Last Update of Whois Database | 1 | |
| Other Data: | | 8) What are the data retention requirements to meet the purpose? (Charter Question 2g) |
| • Field 1 | - | Must go beyond the life of registration for a certain time period in order for ICANN Contractual Compliance to be able to enforce various ICANN contracts and policies. |
| • Field 2 | - | |
| • Field 3 | - | |
| • Field 4 | - | |
| • Field 5 | - | |

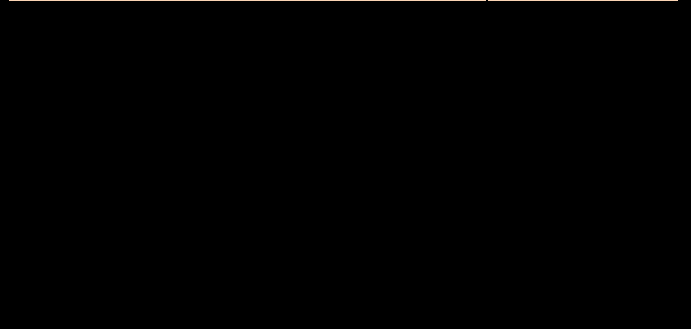
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|  | | 9) Additional information needed to adequately document the purpose? |
| | | None |

Chain of Custody:

- RAA - <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>
- RA - <https://newgtlds.icann.org/sites/default/files/agreements/agreement-approved-31jul17-en.html>
- Temp Spec: Sections 4.4.13, 5.7, Appx C