| **Data Element** | **Redacted**  **B-PA5** |  |
| --- | --- | --- |
| Domain Name | No | **EPDP Team Charter Questions**  f1) Should there be any changes made to registrant data that is required to be redacted? If so, what data should be published in a freely accessible directory?  f2) Should standardized requirements on registrant contact mechanism be developed?  f3) Under what circumstances should third parties be permitted to contact the registrant, and how should contact be facilitated in those circumstances? |
| Registry Domain ID | - |
| Registrar Whois Server | No |
| Registrar URL | No |
| Updated Date | No |
| Creation Date | No |
| Registry Expiry Date | No |
| Registrar Registration Expiration Date | No |
| Registrar | No |
| Registrar IANA ID | No |
| Registrar Abuse Contact Email | No |
| Registrar Abuse Contact Phone | No |
| Reseller | No |
| Domain Status | No |
| Registry Registrant ID | - |
| Registrant Fields |  |
|        Name | Yes |  |
|        Organization (opt.) | No |  |
|        Street | Yes |  |
|        City | Yes |  |
|        State/province | No |  |
|        Postal code | Yes |  |
|        Country | No |  |
|        Phone | Yes |  |
|        Phone ext (opt.) | - |  |
|        Fax (opt.) | - |  |
|        Fax ext (opt.) | - |  |
|        Email[[1]](#footnote-1) | No |  |
| 2nd E-Mail address | - |  |
| Admin ID | - |  |
| Admin Fields |  |
|        Name | - |  |
|        Organization (opt.) | - |  |
|        Street | - |  |
|        City | - |  |
|        State/province | - |  |
|        Postal code | - |  |
|        Country | - |  |
|        Phone | - |  |
|        Phone ext (opt.) | - |  |
|        Fax (opt.) | - |  |
|        Fax ext (opt.) | - |  |
|        Email | - |  |
| Tech ID | - |  |
| Tech Fields |  |
|        Name | Yes |  |
|        Organization (opt.) | - |  |
|        Street | - |  |
|        City | - |  |
|        State/province | - |  |
|        Postal code | - |  |
|        Country | - |  |
|        Phone | Yes |  |
|        Phone ext (opt.) | - |  |
|        Fax (opt.) | - |  |
|        Fax ext (opt.) | - |  |
|        Email[[2]](#footnote-2) | No |  |
| NameServer(s) | No |  |
| DNSSEC | No |  |
| Name Server IP Address | No |  |
| Last Update of Whois Database | No |  |
| Other Data: |  |
|        Field 1 | - |  |
|        Field 2 | - |  |

**Input from Triage on redaction:**

RrSG: Registrant Organization should optionally be redacted, if it can be determined that the Organization contains Personal Information. However, given that there is currently no field in the WHOIS data set to distinguish a legal from a natural person, the application to all registrants is the only solution that offers legal cover to contracted parties, which would otherwise be drawn into making judgment calls on whether start ups, home-based businesses, personally identifying emails and other contacts are caught by GDPR.

BC: BC has the following concerns with this section:

* We should not require redaction of data for legal persons or for cases outside of GDPR jurisdiction.
* Registrant City and Postal Code should be removed as they are not personally identifiable and are applicable to selection of venue when required for legal action.
* Final policy must accommodate circumstances beyond those supported by an unmonitored web form. Examples include providing a registrant’s unique, verified email address (anonymized or other) and registrar being accountable to ensure that mail sent from a web form is received by the registrant and responded to within a defined time interval

NCSG: The NCSG is in general agreement with the approach to publication and redaction of registrant data outlined in Appendix A, sections 2.1 – 2.5. We believe that this approach strikes the right balance between registrant privacy rights and open public access to the data needed to fulfill ICANN’s mission.

GAC: Section 2.2: “For fields that section 2.3 and 2.4 of this Appendix requires to be “redacted”, Registrar and Registry Operator MUST provide in the value section of the redacted field text substantially similar to the following “REDACTED FOR PRIVACY”. Prior to the required date of implementation of RDAP, Registrar and Registry Operator MAY: (i) provide no information in the value section of the redacted field; or (ii) not publish the redacted field.” Should read as: “For fields that section 2.3 and 2.4 of this Appendix requires to be “redacted”, Registrar and Registry Operator MUST provide in the value section of the redacted field text stating “REDACTED FOR DATA PROTECTION”. Rationale: for the sake of greater consistency, the Registrar and Registry Operator should provide the same text in the value fields. Also, “REDACTED FOR DATA PROTECTION” more accurately reflects the reason for redacting (vs “privacy”). Additionally, the GAC would like section 2.2 to include new text that directs WHOIS users to details on how/where to request the non-public (redacted) information.

SSAC: 3) Regarding 2.2, operators should be required to always publish the redacted field name itself. Not publishing the redacted field names gives inconsistent output across providers.

ISPCP: The “Organization” field must also be redacted as a standard since the same issues apply as for registrants. Organization data can be PII and the publication should require consent.

1. Per the current temp spec requirement: 2.5.1. Registrar MUST provide an email address or a web form to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself. [↑](#footnote-ref-1)
2. Idem [↑](#footnote-ref-2)