EPDP Team considerations and deliberations in addressing the charter questions:

* (…)
* In addition, the EPDP Team reviewed the feedback from the European Data Protection Board related to the collection of registration data and took specific note of the following:

“The EDPB considers that registrants should in principle not be required to provide personal data directly identifying individual employees (or third parties) fulfilling the administrative or technical functions on behalf of the registrant. Instead, registrants should be provided with the option of providing contact details for persons other than themselves if they wish to delegate these functions and facilitate direct communication with the persons concerned. It should therefore be made clear, as part of the registration process, that the registrant is free to (1) designate the same person as the registrant (or its representative) as the administrative or technical contact; or (2) provide contact information which does not directly identify the administrative or technical contact person concerned (e.g. admin@company.com). For the avoidance of doubt, the EDPB recommends explicitly clarifying this within future updates of the Temporary Specification[[1]](#footnote-1)”.

* The EPDP Team also took note of a related footnote which states, “[if contact details for persons other than the RNH are provided] it should be ensured that the individual concerned is informed”. The EPDP Team discussed whether this note implies that it is sufficient for the Registered Name Holder (RNH) to inform the individual it has designated as the technical contact or whether the registrar may have the additional legal obligations to obtain consent. The EPDP Team agreed to request further clarification from the EDPB on this point.
* Noting some of the possible legal and technical challenges involved in collecting data from a third party, some (RySG, RrSG, NCSG) expressed the view that registrars should have the option, but are not contractually required, to offer the RNH the ability to provide additional contact fields, e.g., technical function. Others (BC, IPC, ALAC, GAC, expressed the view that registrars should be required to offer the RNH this ability, as making this optional could ultimately lead to risks to DNS stability, security and resiliency. The stakeholders supporting this view noted this functionality is considered important and desirable for some RNHs.

(….)

Preliminary Recommendation #4

(…)

In addition, the EPDP Team recommends that the following data elements are optional for the RNH to provide: technical contact name, email and phone number. (Note, the EPDP Team is still considering whether optional also means optional for the registrar to offer the ability to the RNH to provide these data elements, or whether it would be required for the registrar to offer this ability).

In either case, if the registrar optionally provides this option or is required to provide this option, registrars are to advise the Registered Name Holder at the time of registration that the Registered Name Holder is free to (1) designate the same person as the registrant (or its representative) as the technical contact; or (2) provide contact information which does not directly identify the technical contact person concerned.

1. See <https://www.icann.org/en/system/files/correspondence/jelinek-to-marby-05jul18-en.pdf> [↑](#footnote-ref-1)