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| **O**  **24 October** | **ICANN PURPOSE:**  **research** and publish reports on threats to the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS. |
| **Purpose Rationale**:   |  | | --- | | **1) If the purpose is based on an ICANN contract, is this lawful as tested against GDPR and other laws?**  Research is a legitimate basis for processing per GDPR Article 6(1)f, with specific safeguards defined in Article 89. | | **2) Is the purpose in violation with ICANN's bylaws?**  No. The requirement for research derives from Section 1.2a (Commitments) of the ICANN bylaws:  *(i) Preserve and enhance the administration of**the DNS and the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS and the Internet;*  *(ii) Maintain the capacity and ability to coordinate the DNS at the overall level and work for the maintenance of a single, interoperable Internet;*  This purpose exists to ensure that ICANN may continue to use registration data in support of its mission, whilst maintaining the privacy of data subjects through appropriate safeguards such as pseudonymisation.  Within ICANN, OCTO (Office of the CTO) is responsible for carrying out research. The goal of OCTO Research and Analytics is “to provide trusted and verifiable information to the Internet community regarding the Internet's system of unique identifiers”[[1]](#footnote-1). Similarly, the goal of OCTO-SSR is “to ensure the security, stability and resiliency of the Internet's Identifier systems”.[[2]](#footnote-2) | | **3) Are there any “picket fence” considerations related to this purpose?**  No. This purpose is related to WHOIS, which is within the Picket Fence. | | |

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| **Lawfulness of Processing Test**:   |  |  |  | | --- | --- | --- | | **Processing Activity:** | **Responsible Party:**  (Charter Questions 3k, 3l, 3m) | Lawful Basis: (Is the processing necessary to achieve the purpose?) | | **O-PA1:** Collection of registration data for research purposes  (Charter Question 2b) | ICANN – Controller  Registrar – Processor | ICANN has a legitimate interest in performing research, and collection of registration data is a necessary first step. Collection is not required for the performance of a contract with the data subject, thus the basis is Article 6(1)f. | | **O-PA2:** Transmission of registration data from Registrar to Registry  (Charter Question 2c) | ICANN – Controller  Registrar – Processor  Registry – Processor | Domain name and registration metadata (i.e. nameservers and, optionally, DNSSEC and nameserver IP) are transferred from Registrar to Registry in order to perform the contract. These data elements are not currently processed as personal data and thus may be freely transmitted. If in future it is determined that they should be treated as personal data, transmission would still take place under Article 6(1)b.  Personal registration data (data elements such as Registrant name, address and email) are also transferred from Registrar to Registry under Article 6(1)f, but only in cases where the Registry operates a thick whois service. This is necessary to achieve the research purpose, as (thick) registries are able to apply appropriate safeguards. | | **O-PA3:** Transmission of pseudonymised data from Registry to ICANN  (Charter Question 2e) | ICANN – Controller  Registry – Processor | Registry pseudonymises registration data using industry best practice techniques, and transmits it to ICANN. ICANN has a legitimate interest in performing research using this data, and lawful basis is Article 6(1)f. | | **O-PA4:** Retention of data by Registry  (Charter Question 2g) | ICANN - Controller  Registry - Processor | Once registration data has been successfully transmitted to ICANN, the Registry should not retain the registration data for this purpose. | |

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| **Data Elements Map**: tbc |

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| **Data Elements Matrix**:  “1” = Required “(1)” = Optional “-“ = Not Required or Optional |

| **Data Element** | **Collection**  **O-PA1** | **Transmission**  **A-PA2** | **Transmission**  **A-PA3** | **Retention**  **A-PA4** | **TBD**  **A-PA5** | **TBD**  **A-PA6** |
| --- | --- | --- | --- | --- | --- | --- |
| Domain Name | 1 | 1 | 1 | - | - | - |
| Registry Domain ID | - | - | 1 | - | - | - |
| Registrar Whois Server | - | 1 | 1 | - | - | - |
| Registrar URL | - | 1 | 1 | - | - | - |
| Updated Date | - | 1 | 1 | - | - | - |
| Creation Date | - | 1 | 1 | - | - | - |
| Registry Expiry Date | - | - | 1 | - | - | - |
| Registrar Registration Expiration Date | - | 1 | 1 | - | - | - |
| Registrar | - | 1 | 1 | - | - | - |
| Registrar IANA ID | - | 1 | 1 | - | - | - |
| Registrar Abuse Contact Email | - | 1 | 1 | - | - | - |
| Registrar Abuse Contact Phone | - | 1 | 1 | - | - | - |
| Reseller | - | (1) | (1) | - | - | - |
| Domain Status | - | 1 | 1 | - | - | - |
| Registry Registrant ID | - | - | 1 | - | - | - |
| Registrant Fields |  | | | | | |  |  |  |
|        Name | 1 | 1 | 1 | - | - | - |
|        Organization (opt.) | (1) | (1) | (1) | - | - | - |
|        Street | 1 | 1 | 1 | - | - | - |
|        City | 1 | 1 | 1 | - | - | - |
|        State/province | 1 | 1 | 1 | - | - | - |
|        Postal code | 1 | 1 | 1 | - | - | - |
|        Country | 1 | 1 | 1 | - | - | - |
|        Phone | 1 | 1 | 1 | - | - | - |
|        Phone ext (opt.) | (1) | (1) | (1) | - | - | - |
|        Fax (opt.) | - | - | - | - | - | - |
|        Fax ext (opt.) | - | - | - | - | - | - |
|        Email | 1 | 1 | 1 | - | - | - |
| 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 | - | - | - | - | - | - |
|        Organization (opt.) | - | - | - | - | - | - |
|        Street | - | - | - | - | - | - |
|        City | - | - | - | - | - | - |
|        State/province | - | - | - | - | - | - |
|        Postal code | - | - | - | - | - | - |
|        Country | - | - | - | - | - | - |
|        Phone | - | - | - | - | - | - |
|        Phone ext (opt.) | - | - | - | - | - | - |
|        Fax (opt.) | - | - | - | - | - | - |
|        Fax ext (opt.) | - | - | - | - | - | - |
|        Email | - | - | - | - | - | - |
| NameServer(s) | 1 | 1 | 1 | - | - | - |
| DNSSEC | (1) | 1 | 1 | - | - | - |
| Name Server IP Address | (1) | 1 | 1 | - | - | - |
| Last Update of Whois Database | - | 1 | 1 | - | - | - |
| Other Data: |  | | | | | |
|        Field 1 | - | - | - | - | - | - |
|        Field 2 | - | - | - | - | - | - |

Chain of Custody:

* RAA - <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>
* Temp Spec: Section 4.4.1

1. <https://www.icann.org/octo-research> [↑](#footnote-ref-1)
2. <https://www.icann.org/octo-ssr> [↑](#footnote-ref-2)