**Proposed Changes to Purpose 5**

Current language: Handle contractual compliance monitoring requests, audits, and complaints submitted by Registry Operators, Registrars, Registered Name Holders, and other Internet users.

| **Text of Proposed Change** | **Proponent**  | **Summary of Proposed Change**  |
| --- | --- | --- |
| [No specific wording change proposed. “To the extend ICANN establishes the necessity to process personal data for contractual compliance matters as intended, then we would agree it is acceptable only upon the adoption of appropriate limitations and provisions governing the processing of such datafor this purpose by ICANN as a controller. While GoDaddy supports the purpose, namely the ability of ICANN to enforce compliance of its agreements (RAA, RA) with Contracted Parties, where applicable, it is acceptable only upon adoptionof appropriate limitations and provisions governing the processing of such data for this purposed by ICANN as a controller. Programs that monitor or audit registration data must also be clearly defined before they can be included as a component of this purpose. Execution of a JCA (or other appropriate data processing addendum) between the responsible parties will be a necessary prerequisite to implementation of any obligations resulting from this ePDP.”] | Sara Bockey; GoDaddy | Identifies conditions under which Purpose 5 is acceptable.  |
| Enable ICANN Contractual Compliance through access to individual data sets if required for specific investigations into contracted party compliance regarding alleged violations of their contractual or policy obligations involving domain name registrations involving said data sets  | Volker Greimann; Key Systems | Introduces specificity of data sets and investigations. Appears to delete monitoring and audit requests.  |
| Handle contractual compliance monitoring requests, audits, and complaints submitted by registry operators, registrars, registered name holders, and other internet users as depicted in the attached record or processing activities. | eco; ISPCP | Adds requirement for record of processing activities (but does not provide any further detail or illustration). |
| Handle contractual compliance monitoring requests, audits, and complaints submitted by registry operators, registrars, and registered name holders.  | I2Coalition | Deletes internet users.  |
| Handle contractual compliance monitoring requests, audits, and complaints | George Kirikos | Deletes identified submitters. Unclear whether intends to limit ability to submit complaints to ICANN Compliance.  |
| Handle contractual compliance monitoring requests and audit activities consistent with the terms of the registry agreement and the registrar accreditation agreements. Handle compliance complaints initiated by ICANN, registry operators, registrars, registered name holders, and other internet users consistent with the terms of the registry agreement and the registrar accreditation agreements. | RySG | Divides into 2 parts to clarify that only ICANN Compliance can perform monitoring requests and audit activities. Specifies that monitoring requests, audit activities, and complaints must be consistent with the terms of the RA and RAA.  |
| Handle contractual compliance monitoring requests, audits, and reasonable complaints submitted by registry operators, registrars, registered name holders, and other internet users | Domain Name Rights Coalition | Adds “reasonable” before “complaints”  |
| Handling contractual compliance enforcement activities and audits by ICANN contractual compliance department, as well as ICANN’s action on requests and complaints submitted by registry operators, registrars, registered name holders and other internet users | Government of India | Appears to replace “monitoring requests” with “enforcement activities” |
| Add "ICANN" to the list of parties who may submit compliance monitoring requests | Greg Aaron; iThreat Cyber Group |  |