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| **1.a****07 January** | IN ACCORDANCE WITH THE RELEVANT REGISTRY AGREEMENTS AND REGISTRAR ACCREDITATION AGREEMENTS, ACTIVATE A REGISTERED NAME AND ALLOCATE IT TO THE REGISTERED NAME HOLDER. |
| **Purpose Rationale**:

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| **1) If the purpose is based on an ICANN contract, cite the relevant section of the ICANN contracts that corresponds to the above purpose, if any.*** RAA - <https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>

Yes, this purpose is lawful based on ICANN’s mission to coordinate the allocation and assignment of names in the root zone of the Domain Name System. Specifically, Section 3.2 of the RAA “Submission of Registered Name Holder Data to Registry” refers to what data elements must be placed in the Registry Database as a part of the domain registration (<https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en>).  |
| **2) Is the purpose in violation with ICANN's bylaws?**No, it is not in violation of ICANN’s Bylaws. Specifically, Article 1, Section 1.1 Mission (a)(i) Coordinates the allocation and assignment of names in the root zone of the Domain Name System ("**DNS**") and coordinates the development and implementation of policies concerning the registration of second-level domain names in generic top-level domains ("**gTLDs**"). In this role, ICANN's scope is to coordinate the development and implementation of policies <https://www.icann.org/resources/pages/governance/bylaws-en/#article1>. Further, Articles G-1 and G-2 stipulate, “issues for which uniform or coordinated resolution is reasonably necessary to facilitate interoperability, security and/or stability of the Internet, registrar services, registry services, or the DNS;” and “Examples of the above include, without limitation: principles for allocation of registered names in a TLD (e.g., first-come/first-served, timely renewal, holding period after expiration);” |
| **3) Are there any “picket fence” considerations related to this purpose?**This purpose is related to WHOIS, which is within the Picket Fence. Specifically, Specification 1 of the Registry Agreement (Section 3.1(b) (iv) and (v) of legacy RA) and Specification 4 of the Registrar Accreditation Agreement both refer to categories of issues and principles of allocation of registered names in a TLD. |

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| **Lawfulness of Processing Test**:

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| **Processing Activity:** | **Responsible Party:**(Charter Questions 3k, 3l, 3m) |  **Lawful Basis:** (Is the processing necessary to achieve the purpose?) |
| **A-PA1:** Collection of registration data to allocate domain name string to registrant(Charter Question 2b) | ICANN – Joint ControllerRegistrars – ProcessorsRegistry – Processor / Joint Controller (where applicable) | 6(1)(b) for RegistrarsThis is a 6(1)(b) purpose for Registrars because it is necessary to collect registrant data to allocate a string to a registrant. Without collecting minimal registrant data, the contracted party has no way of tracing the string back to registrant and is not able to deliver its side of the contract.For Registries receiving such data from Registrars to allocate the domain name at the Registry level, this collection is based on 6(1)(f) purpose. (note that registries collection of the data occurs only when the data is disclosed to them by the registrar as per A-PA2)  |
| **A-PA2:** Transmission of registration data from Registrar to Registry(Charter Questions 2c, 2d, 2e, 2i) | ICANN – ControllerRegistrars – Processor | Certain data elements (domain name and nameservers) would be required to be transferred from the Registrar to Registry. The lawful basis would be 6(1)b (vis á vis the processing of the Registrar), should personal data be involved. (NOTE: the Registry’s receipt of this data is the collection , as per A-PA1)  |
| **A-PA3:** Disclosure / Publication of registration data (RDDS) (Charter Questions 2f (gating questions), 2j) | ICANN – ControllerRegistrars – ProcessorRegistries - Processor | Activation of the domain name registration in the DNS requires) the publication of certain data elements, namely domain name and name servers. The lawful basis would be 6(1)f, should personal data be involved. Due to the minimal discretion in the requirements of 1(a) this is a direction from ICANN on what and how to achieve the result. We retain minimal discretion and thus are acting as processors in 1(a). |
| **A-PA4:** Retention of registration data by Registrar(Charter Questions 2g)Retention of registration data by Registry | ICANN –N/ARegistrar – Controller (should they deem it necessary | This is a 6(1)(f) purpose because although there is likely a legitimate interest in providing mechanisms for safeguarding Registered Name Holders' Registration Data in the event of a dispute over ownership or an improper transfer, it is not necessary from a technical perspective to retain the data in order to allocate a string to a registered name holder, and therefore retention is not necessary to perform the registration contract.The registry need only retain data for the duration of the life of the domain. (6(1)(f) |

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| **Data Elements Map**:  |

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

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| **Data Element**  | **Collection****s****A-PA1** | **Transmission****A-PA2** | **Disclosure / Publication****A-PA3** | **Retention (Registrars)****A-PA4** |  |  |
| Domain Name | 1 | 1 | - | 1 |  |  |
| Registry Domain ID | - | - | - | - |  |  |
| Registrar Whois Server | 1 | - | - | 1 |  |  |
| Registrar URL | 1 | - | - | 1 |  |  |
| Updated Date | 1 | - | - | 1 |  |  |
| Creation Date | 1 | - | - | 1 |  |  |
| Registry Expiry Date | 1 | - | - | 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 | - | - | - |  |  |
| ∙       Organization (opt.) | - | - | - | - |  |  |
| ∙       Street | 1 | - | - | - |  |  |
| ∙       City | 1 | - | - | - |  |  |
| ∙       State/province | 1 | - | - | - |  |  |
| ∙       Postal code | 1 | - | - | - |  |  |
| ∙       Country | 1 | - | - | - |  |  |
| ∙       Phone | 1 | - | - | - |  |  |
| ∙       Phone ext (opt.) | - | - | - | - |  |  |
| ∙       Fax (opt.) | - | - | - | - |  |  |
| ∙       Fax ext (opt.) | - | - | - | - |  |  |
| ∙       Email | 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 | 1 |  |  |
| DNSSEC | 1 | - | - | 1 |  |  |
| Name Server IP Address | 1 | - | (1) | (1) |  |  |
| Last Update of Whois Database | 1 | - | - | 1 |  |  |
| Other Data: |  |
| ∙       Field 1 | - | - | - | - |  |  |
| ∙       Field 2 | - | - | - | - |  |  |