**New Purpose – Research**

The team continued to discuss the so-called purpose O. The Team agreed that, to include such a purpose, we would require:

* some expression from ICANN (and OCTO in particular), that personal data was necessary to carry out OCTO’s mission, and
* legal guidance on the interplay of ICANN’s and other parties’ roles as Controller and Processor and how that would affect the legal basis of this data processing purpose.

Therefore, the following language is proposed for the Final Report.

**Proposed Language for inclusion in the Final Report – Consideration of Research as a Purpose for Processing Registration Data**

The EPDP Team considered an additional purpose for processing registration data to address the needs and benefits provided by DNS security and stability research by ICANN Org through investigation, research and publication of reports on threats to the operational stability, reliability, security, global interoperability, resilience, and openness of the DNS.

In doing so, the EPDP Team considered:

* input provided by ICANN Org on the current use of data by ICANN’s Office of the Chief Technology Officer (OCTO) (see [https://community.icann.org/x/ahppBQ)](https://community.icann.org/x/ahppBQ%29), and
* relevant GDPR provisions that allow the use of personal data to carry out research, provided that other GDPR requirements are met.

In its input, OCTO stated it “does not require personal data in domain name registration data for its work. For example, OCTO’s Domain Abuse Activity Reporting (DAAR) project <https://www.icann.org/octo-ssr/daar> uses only the registrar and nameserver information.”

The discussion led to the preliminary conclusion that it was clear that OCTO does not at this time require the use of personal data in its work.

However, questions remained as to whether OCTO may require the use of pseudonymized data in the future in order to carry out its work. If this is the case, clarification may be required as to:

* how GDPR provisions would apply to ICANN Org given its multiple roles as data controller and processor and also the fact that ICANN Org currently does not collect the data; and
* whether ICANN Org could qualify for processing pseudonymized data for research purposes under some existing purpose for processing data listed above in this report.

Therefore, the EPDP Team recognized that additional consideration can be given to this topic once the questions above regarding the need for pseudonymizeddata and legal interpretation are answered. As a result, the EPDP Team is putting forward the following recommendation, recognizing that legal guidance received in the interim could make it no longer relevant.

**Recommendation NEW – Research Purpose for Processing Registration Data**

The EPDP Team commits to considering in Phase 2 of its work whether additional purposes should be considered to facilitate research carried out by ICANN’s Office of the Chief Technology Officer (OCTO) ~~as well as the continuation of the WHOIS Accuracy Reporting System (ARS)~~. This consideration should be informed by legal guidance on if/how provisions in the GDPR concerning research apply to ICANN Org and the expression for the need of such pseudonymized data by ICANN.