Appendix A: Detailed Overview - 9 April 2021

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Austria	AT	Yes	Yes	Data of legal persons are published in the Whois database, whereas display of contact data like telephone number, fax and e-mail address can be disabled.	nic.at does not publish data of natural persons - no matter if domain holder or technical contact person (tech-c) of a domain.	With the WHOIS query, we provide - depending on the legal person - additional information on the domain holder, the technical contact person (tech-c) and technical data (nameserver, DNSSec information) of the delegated domain. Please note that nic.at does not publish the data of natural persons - no matter if they are the domain holder or technical contact person (tech-c) of a domain. Data of legal persons are published in the Whois database, although display of contact data such as telephone number, fax and e-mail address can be disabled. If the domain holder is a natural person whose data are not shown publicly, you may be eligible to apply for a motivated request. Natural persons' domain data is only accessible to people who provide proof of identity and are able to prove a legitimate interest for finding out who the domain holder is. This includes law enforcement agencies, lawyers or people who contact nic.at following domain disputes and can prove that their rights have been infringed. If you are such a person, please use the following webform for your inquiry. (From: https://www.nic.at/en/how-at-works/faqs/domain-holder)	1.4 Legal basis and purpose of data processing Your data are collected and processed first and foremost as follows: -for the purpose of fulfilling the contract -anonymous user behaviour provides the basis for optimising the performance of our website, in which we have a legitimate interest -interest-based advertising, in which we have a legitimate interest -newsletters, on the basis of your consent, which you can revoke at any time Your data will not be forwarded to third parties for their marketing purposes.	https://www.nic.at/en/good_to_know/legal-backgrounds/privacy-policy	1.3 Your options for controlling your data In addition, as a natural person you have the option to expressly request that your name and selected contact data for your domain be published in the WHOIS database. If you do not wish such information to be published, you must ensure that you, or your registrar (whoever submits the application), enters the correct "person type" when registering the domain. You have the choice to be entered as a legal or natural person. The company and contact details of legal persons are publicly accessible. Because there are natural persons behind every legal entity, we recommend that you provide department names rather than names of individual employees, and non-personal e-mail addresses where contact details are required. Otherwise, the named contact person must be obtained in advance.	https://www.nic.at/en/good_to_know/legal-backgrounds/privacy-policy	https://www.nic.at/en/my-at-domain/domain-search/whois-policy
Belgium	BE	Yes	Yes	For domain name registrations registered in the name of companies and organisations, the data of the registrant (name of company, address, phone number) are always shown in a search. However, the name of physical contacts and e-mail address are not shown. For linked 'onsite' and 'tech'-contacts and registrar-contacts the same applies as specified above for private domain name registrations.	For domain name registrations registered in the name of private people the registrant's data are completely protected and cannot be consulted with a normal search. The same applies to possible 'onsite' and 'tech' contacts linked to such domain names, when it concerns a private person here.	On www.dnsbelgium.be, DNS Belgium provides a search function (WHOIS) to search the contact data of a registrant by entering a specific domain name. DNS Belgium would like to confirm that this function has been modified to provide maximum protection for the privacy of registrants. First, a distinction is made between domain name registrations registered in the name of private people and by legal entities. For domain name registrations registered in the name of private people the registrant's data are completely protected and cannot be consulted with a normal search. The same applies to possible 'onsite' and 'tech' contacts linked to such domain names, when it concerns a private person here. With regard to linked contacts of the managing registrar, the name of physical contacts is not shown anymore but the company's contact data are. For domain name registrations registered in the name of companies and organisations, the data of the registrant (name of company, address, phone number) are always shown in a search. However, the name of physical contacts and e-mail address are not shown. For linked 'onsite' and 'tech'-contacts and registrar-contacts the same applies as specified above for private domain name registrations. (From: https://www.dnsbelgium.be/en/privacy-statement)	Why do we process these data? DNS Belgium needs your data to inform you about (technical) problems with your domain name or when our general terms and conditions for the management of domain names were to be subject to a major change. We may also have to share data with the authorities in the context of legal requirements (e.g. a judicial investigation). Sometimes we also have to disclose the data to judicial or legal representatives of third parties who wish to assert certain rights on one or more specific domain names (see also Section 6. Additional notifications). We may also have to disclose data to bodies to settle domain name disputes. These are CEPANI for .be domain names and WIPO (and other organisations designated by ICANN for .brussels and .vlaanderen domain names). In principle, we do not disclose any personal data to countries or authorities outside the European Economic Area (EEA). If DNS Belgium receives a request to that end, our data protection officer will perform a prior legal analysis and then decide whether or not the request can be granted. The decision will depend, among other things, on the motivation (e.g. in the context of legal proceedings) and proportionality (e.g. data relating to one specific registrant v. an extensive subsection of all the data held by DNS Belgium) of the request and whether there are adequate safeguards to prevent further processing of these data. However, we would like to point out our efforts to .be registrants to keep the .be zone secure and more specifically to the procedures to be followed in the context of "Registrant Verification" as described in Section 6. Additional notifications.	https://www.dnsbelgium.be/en/privacy-statement	Why are my personal data visible when someone looks up the registration details of my domain name? If you register a domain name as a company or organisation, the registration data are public information. This means the data are visible to everyone. If you register a domain name as a private person, then your data are covered by the law on privacy and are not visible to everyone. However, if you fill in the field 'Company/Organisation', even if it is only with 'NA', '/' or 'private', then you are registering as a company or organisation and your registration details are therefore visible to everyone. You cannot change this yourself. You have to contact your registrar. He can then request a 'monitored update' from us and amend your details.	https://www.dnsbelgium.be/en/knowledge/faq	https://www.dnsbelgium.be/en/knowledge/faq
Bulgaria	.BG	Yes	Unclear	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	ICANN org was unable to find .BG's policies with regard to publication of legal/natural person data	https://www.register.bg/tld_user_reg/app.pl?action_key=ac_c1p3d1_to_general_terms&frame_key=fr_c1p3_main_frame&lang=en
Croatia	.HR	Yes	Yes	In accordance with the provisions of the General Data Protection (EU) 2016/679, we inform you that the personal data of the domain holder and the contact persons under the domain holder are no longer publicly available through the domain search engine. If you believe that there is a legitimate reason for witch you need to be provided with the data about the domain holder please fill in the Request form for personal data disclosure.	In accordance with the provisions of the General Data Protection (EU) 2016/679, we inform you that the personal data of the domain holder and the contact persons under the domain holder are no longer publicly available through the domain search engine. If you believe that there is a legitimate reason for witch you need to be provided with the data about the domain holder please fill in the Request form for personal data disclosure.	ICANN org was unable to find .HR's policies with regard to publication of legal/natural person data	Data we collect The Register of .hr domains collects personal data of the domain users for the purpose of registration and administration of those domains. Those data are not used for any other purposes according to the Article 6, Item 1 b) of the (EU) Regulation 2016/679 of the European Parliament and Council dated April 27th 2016 relevant to the protection of the individuals with the regard to the processing of personal data and free movement of such data, as well as repealing the Directive 95/46/EZ (General Data Protection Regulation), (SL L 119, 4.5. 2016.) During the process of registration of the domain the Register of .hr domains is collecting following personal data; name and surname of the user, address of the user, personal identification number of the user and email address. All personal data are solely used for the purpose they have been collected for.	https://www.domene.hr/portal/about/whois	In accordance with the provisions of the General Data Protection (EU) 2016/679, we inform you that the personal data of the domain holder and the contact persons under the domain holder are no longer publicly available through the domain search engine. If you believe that there is a legitimate reason for witch you need to be provided with the data about the domain holder please fill in the Request form for personal data disclosure.	https://domene.hr/portal/files/Request_personal_data_disclosure.pdf	

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Cyprus	CY	Yes	No	4.2. The public will only have access to information included within the Public access level except for those which fall under the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data Law of 2018. 4.3. The three access levels and categories of the Registry will be separated between them. 4.4. The Public access level must include and contain the following information: (a) The Domain Name under the «.cy» domain for which a License to Use was assigned, (b) The name of the person who registered the name (only if registered by a legal entity), (c) the expiry date of the license to use,	4.2. The public will only have access to information included within the Public access level except for those which fall under the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data Law of 2018. 4.3. The three access levels and categories of the Registry will be separated between them. 4.4. The Public access level must include and contain the following information: (a) The Domain Name under the «.cy» domain for which a License to Use was assigned, (b) The name of the person who registered the name (only if registered by a legal entity), (c) the expiry date of the license to use,	4. Registry of Domain Names 4.1. The Administrator keeps a Registry which will include three access levels: (a)Administrator access level, (b)Public access level, (c)Registrant of License to Use of Domain Name under the «.cy» domain access level. 4.2. The public will only have access to information included within the Public access level except for those which fall under the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data Law of 2018. 4.3. The three access levels and categories of the Registry will be separated between them. 4.4. The Public access level must include and contain the following information: (a) The Domain Name under the «.cy» domain for which a License to Use was assigned, (b) The name of the person who registered the name (only if registered by a legal entity), (c) the expiry date of the license to use, (From: https://www.nic.cy/portal//sites/default/files/Agreementfortheregistration.pdf)	19.2. Personal Data submitted by the Applicant, Registrant or a third party will be processed as follows: (a) will be submitted in the Registry, (b) such personal data may be transmitted to government bodies or Law enforcement agencies for security or defence purposes of the Republic of Cyprus as provided by the Processing of Personal Data and for the Free Movement of such Data Law, and (c) such personal data will be transmitted to third parties only if requested by a Court Order. 19.3. The Administrator assumes legal responsibility for the integrity of the Registry's database and its supporting process. He is responsible for maintaining the accuracy of the data contained in the database based on the information provided by the Applicants, Registrants, Authorised Representatives or third parties, but has no responsibility regarding the intellectual property rights of the names used as Domain Names. The Registrant shall be solely responsible for any breach of these rights by registration. 19.5. Personal data contained in the Administrator's database may be transmitted to countries within and outside the European Union. The transfer shall be made in accordance with the Processing of Personal Data and for the Free Movement of such Data Law. By registering a Domain Name, the Registrant consents to the transmission of such personal data to countries within and outside the European Union, and to the processing of such personal data for the purposes set out above in accordance with Processing of Personal Data and for the Free Movement of such Data Law.	https://www.nic.cy/portal//sites/default/files/Agreementfortheregistration.pdf	19.4. As required by the Processing of Personal Data and for the Free Movement of such Data Law, the Administrator shall adopt appropriate security procedures regarding the retention and disclosure of information provided by the Registrant, Authorised Representative or third party to prevent unauthorized access. Security procedures mean that the Administrator may request proof of identity before proceeding with the disclosure of personal data. Except for the uses mentioned above, the Administrator will not disclose personal data to others unless the Registrant has explicitly authorized the Administrator to do so.	https://www.nic.cy/portal//sites/default/files/Agreementfortheregistration.pdf	
Czechia/Czech Republic	CZ	Yes	Yes	Only the name or organization is always visible. For domain name registration, respectively contact name registration, only a minimum of data is required - name, e-mail and postal address and of course the identifier. If you are interested in details, see Appendix 1 of the Rules of Registration.	All data is automatically hidden (e.g. e-mail, date of birth, telephone or fax numbers). If the organization is not filled in, the contact should belong to the individual, so if this is confirmed by verifying the correctness of the entered data, either by using one-time passwords or the mojeID service, the mailing address will be hidden from the Whois public database. For domain name registration, respectively contact name registration, only a minimum of data is required - name, e-mail and postal address and of course the identifier. If you are interested in details, see Appendix 1 of the Rules of Registration.	The handling of your personal data is a subject to legal protection and the CZ.NIC Association acts in full compliance with legal regulations. For domain name registration, respectively contact name registration, only a minimum of data is required - name, e-mail and postal address and of course the identifier. If you are interested in details, see Appendix 1 of the Rules of Registration. Obviously, we will not provide your data to anyone else, but the people we have to provide it by law - such as the police, the courts, the tax authorities, etc. - are the exception. The data in the public part of the registry is used to identify domain name holders to others. All data is automatically hidden (e.g. e-mail, date of birth, telephone or fax numbers). If the organization is not filled in, the contact should belong to the individual, so if this is confirmed by verifying the correctness of the entered data, either by using one-time passwords or the mojeID service, the mailing address will be hidden from the Whois public database. Therefore, only the name or organization is always visible. This is for the sake of protecting the rights of you, as a domain name holder, and others, including consumers, securing Internet security as well as trust in the content that is published on it. Thus, there is a wide range of people who have a legitimate interest in the availability of Whois, in part public, and the accuracy of the data it contains, and the possibility to obtain domain name contact data without unnecessary costs and delays. Please note, however, that we may also disclose hidden data in accordance with the obligations imposed by law - to the courts, including the arbitrator, the police, the tax authorities and others. We will also provide it to the person who asks for it - but he must prove his identity and also provide and demonstrate the purpose for which he needs the data. CZ.NIC is not obliged to comply with such a request (if it concludes that it is contrary to good manners, the applicant does not prove the purpose, etc.). If you would like your data to be publicly displayed in the Whois database, you can edit the settings in the Domain Browser or contact your registrar. (From: https://www.nic.cz/page/383/faq/#faq26)	3. PROCESSING OF PERSONAL DATA UNDER AN AGREEMENT 3.1. The processing of personal data by the CZ.NIC Association is carried out in the vast majority of cases (exceptions are provided in the Privacy Policy) because of the necessity of fulfilling an agreement concluded between CZ.NIC and the data subject, always for the purpose of fulfilling such an agreement. 3.2. The CZ.NIC Association is authorised to process personal data for the entire duration of the agreement and for a period of 10 years after the expiration of the agreement, unless stated otherwise in the Special Principles or unless a longer period is stipulated by law, for the purposes of archiving and the legitimate interests of the CZ.NIC Association or third parties under a restricted processing regime so that the data can be used to determine the exercise of, or to defend against, legal claims.	https://www.nic.cz/files/documents/20180525_Zasady_zpracovani_osobnich_udaju_AJ.pdf	If you would like your data to be publicly displayed in the Whois database, you can edit the settings in the Domain Browser or contact your registrar.	https://www.nic.cz/page/383/faq/#faq26	https://www.nic.cz/files/nic/doc2/Registration_rules_CZ.pdf https://www.nic.cz/files/documents/20180525_Pravidla_registrace_CZ_-_AJ.pdf

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Legal vs. Natural Person Data**

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Denmark	DK	Yes	No	The Danish Internet Domain Act does not distinguish between natural and legal persons, which means that our obligation to public registrant's names, addresses and telephone numbers applies to both natural and legal persons.	The Danish Internet Domain Act does not distinguish between natural and legal persons, which means that our obligation to public registrant's names, addresses and telephone numbers applies to both natural and legal persons.	No. The Danish Internet Domain Act does not distinguish between natural and legal persons, which means that our obligation to public registrant's names, addresses and telephone numbers applies to both natural and legal persons. The purpose of this provision by the Danish legislators was to establish a high-quality domain with as much transparency as possible. Anyone should be able find out the identity of a registrant, and thus who is the person behind a specific domain name. The provision should, among other things, help to limit illegal websites as well as harassment on websites etc., since registrants were not, as a rule, anonymous. However, in the Danish Internet Domain Act, there is an exception to the obligation to publish registrant information, namely that name, address and telephone number should not be published if this information is exempt from publication according to other legislation. If a natural person has obtained protected name and address status in the Danish Central Person Register (CPR) or the equivalent in this person's country of residence, the name and address information is exempt from publication. (From: https://www.icann.org/en/system/files/correspondence/vignal-schjoth-to-plexida-28may20-en.pdf)	**Collection and purpose** The collection and processing of personal data is necessary for the provision of services to DK Hostmaster's customers, including the establishment of customer relationships with registrants, maintaining contact, providing services and support, invoicing etc. DK Hostmaster is also required by law to collect information for the purpose of maintaining the whois database. We only collect the minimum personal data required to meet our obligations as administrator of .dk domain names. DK Hostmaster only collects personal data about registrants, a registrant's proxy and billing contact (if applicable), and registrars. The personal data we collect and process consists primarily of contact information and information about the registration of a domain name, in the form of: -name, -address, -telephone number, -email, -user ID, -CPR number, -CVR number, -IP address, -domain name, -invoice numbers, and -credit note numbers. In connection with submitting an application for a domain name to a registrar, you must also enter into an agreement with DK Hostmaster on the right of use of a .dk domain name. In this connection, information is transferred from the registrar to DK Hostmaster so that DK Hostmaster can perform registration in the whois database and subsequently contact the registrant. DK Hostmaster collects and processes information in connection with the use of DK Hostmaster's self-service portal. In connection with the use of our registrar portal, the personal data also includes the registrar's employees, who are registered in DK Hostmaster's systems. DK Hostmaster may also collect and process updated personal data in connection with checking the contact information and identity of registrants, as well as validation of contact information by searching for information registered under a CPR or CVR number, see more below. This is necessary to ensure that the personal data we process about you is accurate, as required by the Danish Domain Names Act. Therefore, it is also important that you always keep your own personal data in our systems up to date.	https://www.dk-hostmaster.dk/en/privacy-policy	**Whois and GDPR** As a registrant, your name and address information is public in the Whois database, available on our website. This is a requirement under the Domain Names Act, whether the registrant is an organization or an individual. As a result of the new General Data Protection Regulation (GDPR), many other domain administrators choose to shut down openness about registrant information in their whois database. This is because most other countries have no law that obliges domain administrators to show who is responsible for the registration of a domain name. DK Hostmaster will continue to publish the name, address and telephone number of registrants, as this is a requirement in the Domain Names Act. This means that DK Hostmaster has a legal basis for the publication. **Anonymity** You can only be anonymous in our database if you are registered in the Danish Civil Registration System as having name and address protection. You are automatically hidden in our database when you are registered in the Danish Civil Registration System as having name and address protection. Read more about name and address protection at borger.dk.	https://www.dk-hostmaster.dk/en/gdpr	
European Union	EU	Yes	Yes	Information displayed for legal entities holding a domain name is limited to: -organisation name; Company City Region Country Email address Language	Information displayed for individuals holding a domain name is limited to: Email address Language	When the Registrant is a legal person, the Registry publishes the following information: -organisation name; -city and country; -e-mail address; -language. When the Registrant is a natural person the Registry publishes the Registrant´s e-mail address and language. Natural persons who register a Domain Name may be informed by their Registrar of the possibility of creating and using a specific functional e-mail address for publication in the WHOIS, as an alternative to the use of their personal e-mail address.	On what legal basis do we process your personal data? We may process your personal data based on different legal grounds as follows: - Processing may be necessary in order to comply with our legal obligations as a registry or as a data controller; -Processing may be necessary for the execution of your contract with us; -Processing is necessary for the protection of our legitimate interests such as: economic, commercial and financial interests, business continuity, the security and confidentiality of customer information and products, and the security of digital and physical infrastructure; - In exceptional cases, our processing activities may be conducted with your consent.	https://eurid.eu/d/7552959/Privacy_Policy_en.pdf	ICANN org was unable to find .EU's policies with regard consent to publication of natural person data.		https://eurid.eu/en/other-information/faq/technical-and-privacy-enquiries/#how-are-personal-data-processed-by-eurid

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Estonia	EE	Yes	Yes	3.4.1 Regarding the Domain Name, the EIF publishes via the intermediation of the WHOIS service its Name Servers' names, DNSKEY records, the Registrar's name, date of registration of the Domain Name, date of the most recent amendment of the Registration data, the Domain Name status and the Domain Name expiry date. In the case of a Registrant who is a legal person, the EIF also publishes the name, registry code, and the name and e-mail address of the Administrative and Technical contacts. After the Domain Name expiry date, in addition to the data listed above, the EIF also publishes the Domain Name suspension and expiry date via the WHOIS service.	3.4.1 Regarding the Domain Name, the EIF publishes via the intermediation of the WHOIS service its Name Servers' names, DNSKEY records, the Registrar's name, date of registration of the Domain Name, date of the most recent amendment of the Registration data, the Domain Name status and the Domain Name expiry date. . . . After the Domain Name expiry date, in addition to the data listed above, the EIF also publishes the Domain Name suspension and expiry date via the WHOIS service.	3.4 EIF activity in the registration of domain names 3.4.1 Regarding the Domain Name, the EIF publishes via the intermediation of the WHOIS service its Name Servers' names, DNSKEY records, the Registrar's name, date of registration of the Domain Name, date of the most recent amendment of the Registration data, the Domain Name status and the Domain Name expiry date. In the case of a Registrant who is a legal person, the EIF also publishes the name, registry code, and the name and e-mail address of the Administrative and Technical contacts. After the Domain Name expiry date, in addition to the data listed above, the EIF also publishes the Domain Name suspension and expiry date via the WHOIS service. 3.4.2 After registration of the domain name, the EIF will enable the Registrant of the Domain Name whose contact details are not publicly available through the WHOIS service to be contacted. In this case, the EIF will not disclose the Registrant's data (From: https://meedia.internet.ee/files/Domain_Regulation_EN_01.07.2020.pdf)	8 PROCESSING AND PROTECTION OF PERSONAL DATA 8.1 Personal data for the purposes of the Domain Regulation are any data about a natural person that have been submitted to EIF in connection with the registration of a Domain Name. For the purposes of the Personal Data Protection Act, EIF is the chief processor of personal data and the Registrar is the authorised processor of personal data. EIF processes personal data as follows: 8.1.6 all personal data for the processing of domain disputes in the Domain Disputes Committee and in court; 8.1.7 all personal data for adhering to legislation or a standard, instruction or customary practice with a mandatory effect in regards to EIF, as well as for the protection of its violated or disputed rights in court or extrajudicially. 8.2 A Registrar via whose intermediation a Registrant has applied for the registration of a Domain Name or for the replacement of a Registrar shall process the personal data for the purposes prescribed in clause 8.1.1. Personal data set out in clause 8.1.2 shall be processed by the aforesaid Registrar for the forwarding of information. 8.3 EIF has the right, in the case of the objectives set out in clause 8.1, to prepare on different bases lists from analysed personal data (for example, a list of Registrants, etc.). 8.4 EIF may issue third parties personal data provided by a Registrant to EIF for processing only in the case and on the bases laid down in law.	https://meedia.internet.ee/files/Domain_Regulation_EN_01.07.2020.pdf	8.1 Personal data for the purposes of the Domain Regulation are any data about a natural person that have been submitted to EIF in connection with the registration of a Domain Name. For the purposes of the Personal Data Protection Act, EIF is the chief processor of personal data and the Registrar is the authorised processor of personal data. EIF processes personal data as follows: 8.1.3 to disclose the names and e-mails of a Registrant who is a natural person, and it's Administrative and Technical Contact on the Internet via answering. WHOIS service queries only on the basis of individual consent;	https://meedia.internet.ee/files/Domain_Regulation_EN_01.07.2020.pdf	https://www.internet.ee/domains/ee-domain-regulation#identification-and-identity-verification-requirements
Finland	FI	Yes	Yes	Domain name user, legal entity: Following data is published as a main rule: Name of the legal entity, business ID, postal address, phone number. Only email address (processing email address) of a legal entity can be published with a permission given by a legal entity user.	Domain name user, natural person: No personal data of natural persons is published in any case. Natural person cannot give a permission to publish any part of his/her personal data.	1. Does the .fi differentiate between domain name registrations of legal and natural persons in any way? Yes, .fi registry system is built to differentiate domain name users either to be legal entities or natural persons. 2. If yes, how does the registry determine or verify which registrants are legal persons vs natural persons? When fi-registrar registers fi-domain, registrar has to choose domain user to be either legal entity or natural person. Domain user data given into the fi-registry is partly different with legal entities (business ID/registry number) and natural persons (social security number or other identifying information). Domain name user, natural person: No personal data of natural persons is published in any case. Natural person cannot give a permission to publish any part of his/her personal data. Domain name user, legal entity: Following data is published as a main rule: Name of the legal entity, business ID, postal address, phone number. Only email address (processing email address) of a legal entity can be published with a permission given by a legal entity user. (From: https://www.icann.org/en/system/files/correspondence/malinen-to-plexida-04jun20-en.pdf)	Processing of personal data The purpose of the Privacy Policy is to protect personal data. Personal data means any information that can be used to identify a person directly or indirectly. Traficom has a number of statutory obligations, which may involve the processing of personal data. If we process your personal data for compliance with a legal obligation, we do not need your explicit consent. Besides complying with legal obligations, Traficom also collects personal data with your consent for providing certain services. In such cases, we request your consent to process your data and you have the right to withdraw your consent at any time. We process your personal data in accordance with legislation and good data processing practice. Traficom's Privacy Policy contains the principles and aims regarding the processing of personal data and the implementation of data protection in line with the EU GDPR and the Finnish Data Protection Act. Read more about the purposes and lawfulness of the processing of personal data on Traficom's webpage on registers.	https://www.traficom.fi/en/traficom/privacy-policy	According to correspondence received from the .FI Registry Opereator, "No personal data of natural persons is published in any case. Natural person cannot give a permission to publish any part of his/her personal data."	https://www.icann.org/en/system/files/correspondence/malinen-to-plexida-04jun20-en.pdf	https://www.icann.org/en/system/files/correspondence/malinen-to-plexida-04jun20-en.pdf

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Legal vs. Natural Person Data
9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
France	FR	Yes	Yes	The personal data (name, address, phone, etc.) you provided when registering your domain name are recorded but they are replaced by the words "Restricted information" on the form corresponding to your domain name in the Whois directory. These contact details are available, upon substantiated request sent to the Legal Department of AFNIC, and under certain conditions. Note that this protection does not apply to the business contact information provided by the representative of a corporation (holder, administrative contact or technical contact).

Data appearing on the Whois database
-Domain name ;
-Registrant information:
o For Legal entities: corporate name, postal address, phone number, fax number, email address, ID or "nic-handle";
-Administrative contact information
o For Legal entities: corporate name, postal address, phone number, fax number, email address, ID or "nic-handle";
-Technical contact information (first name and last name or corporate name, postal address, phone number, fax number, email address, ID or « nic handle »);
-Registrars information ;
-Qualification operations information from AFNIC ;
-Qualification operations information from the registrar ;
-DNS Servers and information about DNSSEC ;
-Date of the main operations carried out on the domain name. | The personal data (name, address, phone, etc.) you provided when registering your domain name are recorded but they are replaced by the words "Restricted information" on the form corresponding to your domain name in the Whois directory. These contact details are available, upon substantiated request sent to the Legal Department of AFNIC, and under certain conditions. Note that this protection does not apply to the business contact information provided by the representative of a corporation (holder, administrative contact or technical contact).

Data appearing on the Whois database
-Domain name;
-Registrant information:
o For Individual registrant: no personal data is published except if the registrant does not wish to benefit from the restricted information option, in which case the following data are published: first and last name of the registrant, postal address, phone number, fax number, email address, ID or "nic-handle"
-Administrative contact information
o For Individual registrant: no personal data is published except if the registrant does not wish to benefit from the restricted information option, in which case the following data are published: first and last name of the registrant, postal address, phone number, fax number, email address, ID or "nic-handle" ;
-Technical contact information (first name and last name or corporate name, postal address, phone number, fax number, email address, ID or « nic handle ») ;
-Registrars information ;
-Qualification operations information from AFNIC ;
-Qualification operations information from the registrar ;
-DNS Servers and information about DNSSEC ;
-Date of the main operations carried out on the domain name. | I do not want my personal details to appear in the Whois directory. Is this possible? What does "restricted information" mean?
Yes it is possible for individual domain name registrants. The registrar in charge of your domain name can request this change with Afnic. The personal data (name, address, phone, etc.) you provided when registering your domain name are recorded but they are replaced by the words "Restricted information" on the form corresponding to your domain name in the Whois directory. These contact details are available, upon substantiated request sent to the Legal Department of AFNIC, and under certain conditions. Note that this protection does not apply to the business contact information provided by the representative of a corporation (holder, administrative contact or technical contact).
(From: https://www.afnic.fr/en/resources/faq/general-faq/)

Chapitre 2 - Nature of the Whois data
Article 2.1 – Data appearing on the Whois database
-Domain name ;
-Registrant information:
o For Individual registrant: no personal data is published except if the registrant does not wish to benefit from the restricted information option, in which case the following data are published: first and last name of the registrant, postal address, phone number, fax number, email address, ID or "nic-handle") ;
o For Legal entities: corporate name, postal address, phone number, fax number, email address, ID or "nic-handle");
-Administrative contact information
o For Individual registrant: no personal data is published except if the registrant does not wish to benefit from the restricted information option, in which case the following data are published: first and last name of the registrant, postal address, phone number, fax number, email address, ID or "nic-handle") ;
o For Legal entities: corporate name, postal address, phone number, fax number, email address, ID or "nic-handle");
-Technical contact information (first name and last name or corporate name, postal address, phone number, fax number, email address, ID or « nic handle ») ;
-Registrars information ;
-Qualification operations information from AFNIC ;
-Qualification operations information from the registrar ;
-DNS Servers and information about DNSSEC ;
-Date of the main operations carried out on the domain name.
(From: https://www.afnic.fr/medias/documents/politiques/AFNIC-_politique_publication_et_acces_aux_donnees_20180425_VEN.pdf) | Afnic makes its best efforts to initiate a policy of publishing "whois" data which it collects in accordance with the provisions of the French Electronic Communications and Telecommunications Act and with the provisions resulting from the regulations in force applicable to the processing of personal data and, in particular, Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 applicable from 25 May 2018 (hereinafter "the European Data Protection Regulation" or "GDPR"). The terms of this publication in automated formats and under Open License licenses will be published prior to. their implementation.

Article 1.2 – General Principles
One of the principal stakes in managing this database is to preserve a balance between personal data protection for the .fr domain name registrants and the legitimate need to access the referenced contact information for these same domain names.

To do so, AFNIC carries out the necessary protection to supervise the data use modalities through equitable and non-discriminatory treatment and in accordance with the purpose of the database described in the naming policy and in this document. | https://www.afnic.fr/wp-media/uploads/2020/12/AFNIC-_politique_publication_et_acces_aux_donnees_20180425_VEN.pdf | Article 3.1 – Privacy Policy
The data collected by the registrars during domain registrations are published in the Whois database.

However according to the provisions applicable to the protection of personal data, personal data concerning individual registrants, for data related to registrant and administrative contacts, are protected and are not published. This process called restricted publication is applied by default unless the opposite is requested by the registrant.

Furthermore, AFNIC urges legal entities registrants not to give personal data during the registration of their domain name. | https://www.afnic.fr/wp-media/uploads/2020/12/AFNIC-_politique_publication_et_acces_aux_donnees_20180425_VEN.pdf | https://www.afnic.fr/en/resources/reference/registry-policies/data-publication-and-acces-policy.html |
| Germany | DE | Yes | No | .DE does not differentiate between legal/natural persons. The following information can be accessed via the Domain Query:

The status of the domain, i.e. registered/unregistered;
The technical data of the domain, and
Information for establishing contact (General Request and Abuse) | .DE does not differentiate between legal/natural persons. The following information can be accessed via the Domain Query:

The status of the domain, i.e. registered/unregistered;
The technical data of the domain, and
Information for establishing contact (General Request and Abuse) | Information available to the general public
The following information can be accessed via the Domain Query:

The status of the domain, i.e. registered/unregistered;
-The technical data of the domain, and
-Information for establishing contact:

Information for Domain Holders
-If you are the holder of a domain, you can request all related data registered in the DENIC database via the Domain Query.

The nature and extent of the domain data that is made available via the domain query is restricted. The data of the domain holder will no longer be displayed.

DENIC's Domain Query lookup service is compliant with the provisions of the European General Data Protection Regulation (Regulation (EU) 2016/679) applicable from 25 May 2018, which regulate the protection of natural persons with regard to the processing of personal data. The data output is driven by the principle of data economy. Those data relating to the technical contact and zone administrator (Tech-C, Zone-C) as well as to the administrative contact (Admin-C) formerly output via the Domain Query are not recorded and consequently not displayed anymore.

The two contact points General Request and Abuse that are recorded in addition to the domain holder data are non-personalised. They are under the registrar's responsibility.

DENIC continues recording and publishing such technical data, including name server or DNS key information, that is needed to establish the functionality of the domain.

(From: https://www.denic.de/en/service/whois-service/tx_denic_notification%5Baction%5D=acknowledge&tx_denic_notification%5Bcontroller%5D=Notification&tx_denic_notification%5Bnotification%5D=4&cHash=945f07c9fcaa63442a02eb19a735fd92) | 4. DENIC Domain Query (Whois Service)
Domain holders and third parties who can prove to have a legitimate interest, can use the DENIC domain query at https://www.denic.de/webwhois-web20/?lang=en to obtain specific holder information of a domain. For more detailed information, please go to https://www.denic.de/en/service/whois-service/third-party-requests-for-holder-data/.

4.1. Scope of Data Processing
We will process the personal data that has been transmitted in relation with the whois service. In the respective form, you can see which data will be processed. In the forms, only those fields are marked as mandatory that are absolutely necessary to process your domain query.

4.2. Legal Basis
If domain holders themselves make the DENIC domain query, the legal basis for processing the data is Article 6(1) (b) of the GDPR in conjunction with our Domain Guidelines and/or our Domain Terms and Conditions. If a third party makes the domain query, the legal basis for the processing of your data is Article 6(1) (f) of the GDPR. It is our legitimate interest to process your domain query.

4.3. Purpose of Data Processing and Categories of Recipients
Use of the data is strictly limited to the context of the whois service. Your data is not passed on to any third party in this context.

4.4. Duration of Storage of Your Personal Data
Your personal data is deleted upon expiry of the first full calendar year following the submission of the application. | https://www.denic.de/en/about-denic/data-privacy-statement/ | ICANN org was unable to find .DE's policies with regard consent to publication of natural person data. | | |

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Greece	GR	Yes	No	2. As an exception to the above, in any event EETT shall disclose the data of a [.gr] or [.ελ] Domain Name Holder in case of a relevant Public Prosecutor Order. 3. The personal data of legal persons that are Domain Name Holders shall be disclosed to third parties following their request.	1. The personal data of natural persons that are Domain Name Holders shall neither be published nor disclosed to any third parties. 2. As an exception to the above, in any event EETT shall disclose the data of a [.gr] or [.ελ] Domain Name Holder in case of a relevant Public Prosecutor Order.	Regulation on Management and Assignment of .gr and .ελ Domain Names Decision No. 843/2 of 01/03/2018 of EETT Data protection 1. The personal data of natural persons that are Domain Name Holders shall neither be published nor disclosed to any third parties. 2. As an exception to the above, in any event EETT shall disclose the data of a [.gr] or [.ελ] Domain Name Holder in case of a relevant Public Prosecutor Order. 3. The personal data of legal persons that are Domain Name Holders shall be disclosed to third parties following their request. 4. Following the issuance of a relevant EETT Decision, the Registrars may be allowed to communicate to third parties any registration data of [.gr] or [.ελ] Domain Name Holders that are legal persons. 5. Following the issuance of a relevant EETT Decision, the Registrars may be allowed to communicate to third parties that submit to them a relevant request, the personal data of natural persons that are Holders of [.gr] or [.ελ] Domain Names they manage and have not explicitly refused the disclosure thereof. 6. Registrants notify the personal data of legal and natural persons that are [.gr] or [.ελ] Domain Name Holders under their management, following the request of the competent public auditing authority. 7. Without prejudice to the provisions of the legislation in force regarding the protection of personal data, the Registrars shall only collect personal data of the persons submitting [.gr] or [.ελ] Domain Name registration declarations, or declarations for other acts related to [.gr] or [.ελ] Domain Names, to the extent necessary for processing these declarations. The collection or processing of personal data for other purposes without the concerned persons consent shall be prohibited according to the legislation in force. (From: https://grweb.ics.forth.gr/public/domains/regulation)	Without prejudice to the provisions of the legislation in force regarding the protection of personal data, the Registrars shall only collect personal data of the persons submitting [.gr] or [.ελ] Domain Name registration declarations, or declarations for other acts related to [.gr] or [.ελ] Domain Names, to the extent necessary for processing these declarations. The collection or processing of personal data for other purposes without the concerned persons consent shall be prohibited according to the legislation in force.	https://grweb.ics.forth.gr/public/assets/docs/en/973-B-2018.pdf	ICANN org was unable to find .GR's policies with regard consent to publication of natural person data.		https://www.eett.gr/opencms/export/sites/default/EETT_EN/Electronic_Communications/Domain Names/APS92_012_2011_.pdf
Hungary	HU	Yes	Yes	Name of the delegated domain Technical data of the delegated domain Registrant contact information/details	Where the registrant is a natural person the only designation shown is "natural person". The technical contact person will be designated by the e-mail address entered into the records.	2.3. Legal grounds for data controlling: Personal data are required to be controlled in order to perform the contract on the application for and maintenance of domain, thus our data controlling activity is based on GDPR Article 6 section (1) item b. In order to respect and ensure your rights to the security of your personal data and informational freedom we will not display publicly your personal data as those of a domain applicant or registrant. However, it may become necessary to disclose your name and contact information to enforce the legal interests of a third party and in such a case we will transfer such data to that third party subject to certain conditions as part of data controlling in accordance with GDPR Article 6 paragraph (1) item f. As it will remain necessary to be able to check or retrieve information relating to a particular domain for the secure functioning of the Internet or for enforcing your or other person's legal interest even after the termination of the contract on domain maintenance, we will control data based on GDPR Article 6 paragraph (1) item f after the termination of the contract. 2.4. Who can have access to your personal data? Personal data to be controlled in relation to the contract on domain delegation and maintenance will be provided by you to the Registrar on the application form who will forward them to the Registry via a closed access domain records system. When delegating the domain to you, the Registry will record the data relating to the particular domain name. Your data can be accessed by the duly authorised associates and data processors of your contracted Registrar and the Registry during the term of the contract in order to perform the contract on domain delegation. As the secure functioning and rules of the Internet require us to maintain a publicly accessible database of domain names, particular data may be retrieved by anyone from the WHOIS database accessible at http://www.domain.hu/domain/English/domainsearch and from the announcement list of domains the right of whose using has been granted conditionally, available at http://www.domain.hu/domain/English/meghirdetes.html. Where the registrant is a natural person the only designation shown is "natural person". The technical contact person will be designated by the e-mail address entered into the records. As it may be in a third party's legal interest to contact you in certain cases on matters relating to the domain, we will make it possible on a specifically designed web interface to send messages for you to your e-mail address contained in the records and to the e-mail address of your administrative contact person. However, your data or those of your administrative contact person will not become accessible to the third party unless you provide your data to the third party by answering directly to the message sender on a voluntary basis. (From: http://www.domain.hu/datacontrolling.pdf)	Legal basis for data controlling: an agreement will be entered into according to article 10 of the Domain Registration Rules and Procedures Domain by and between the Registry and the Alternative Dispute Resolution Forum and the Applicant and the Registrant Applyee on the subject matter of the legal dispute for conducting the procedure, thus the legal grounds for data controlling will be the performance of the agreement as per GDPR Article 6 paragraph (1) item b.	https://www.domain.hu/app/uploads/2021/03/datacontrolling.pdf	ICANN org was unable to find .HU's policies with regard consent to publication of natural person data.	https://www.domain.hu/app/uploads/2021/03/datacontrolling.pdf	http://www.domain.hu/datacontrolling.pdf (Link appears to be dead as of 19 February 2021)
Iceland	IS	No	Yes	"By default, most of the personal information on individuals (registrants and contacts) is withheld from publication. Note that the country is always published. You can decide to explicitly publish the rest of your information by going to "My settings" and toggle "Publish in WHOIS" to "Yes". Please remember that this only applies to individuals."	"By default, most of the personal information on individuals (registrants and contacts) is withheld from publication. Note that the country is always published. You can decide to explicitly publish the rest of your information by going to "My settings" and toggle "Publish in WHOIS" to "Yes". Please remember that this only applies to individuals."	Can I withhold publication of my registration data from the ISNIC whois database? By default, most of the personal information on individuals (registrants and contacts) is withheld from publication. Note that the country is always published. You can decide to explicitly publish the rest of your information by going to "My settings" and toggle "Publish in WHOIS" to "Yes". Please remember that this only applies to individuals. Note the circumstance's in Release of hidden Registration Data from ISNIC's Whois (From: https://www.isnic.is/en/faq#q25a)	ICANN org did not expand upon non-EU country policies.		ICANN org did not expand upon non-EU country policies.		https://www.isnic.is/en/about/informationpolicy#whois_access

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Ireland	IE	Yes	Yes	Our WHOIS Policy is to provide the following information relating to all registered .ie domain names: - Domain name - Domain status - Creation date - Expiry date - Updated date - Registrant name Note 1 - Registrant contact ID - Admin contact ID - Tech contact ID - Sponsoring Registrar - Sponsoring Registrar's abuse-contact email address and telephone number - Hosts - DNSSEC status Note 1 Registrant name:- The Registrant name is not published for Natural Persons…	Our WHOIS Policy is to provide the following information relating to all registered .ie domain names: - Domain name - Domain status - Creation date - Expiry date - Updated date - Registrant name Note 1 - Registrant contact ID - Admin contact ID - Tech contact ID - Sponsoring Registrar - Sponsoring Registrar's abuse-contact email address and telephone number - Hosts - DNSSEC status Note 1 Registrant name:- The Registrant name is not published for Natural Persons…	Our WHOIS Policy is to provide the following information relating to all registered .ie domain names: - Domain name - Domain status - Creation date - Expiry date - Updated date - Registrant name Note 1 - Registrant contact ID - Admin contact ID - Tech contact ID - Sponsoring Registrar - Sponsoring Registrar's abuse-contact email address and telephone number - Hosts - DNSSEC status Note 1 Registrant name:- The Registrant name is not published for Natural Persons…, as defined in Section 1., "Definitions". A Natural Person Registrant may choose to allow its name to be published on the output from the WHOIS services for some or all of its .ie domain registrations, where the Registrant provides its explicit consent to this publication. The Registrant can revoke this consent to publication at any time. Note that the Registrant name is published where the Registrant is a Legal Person, as defined in Section 1., "Definitions". (from: https://www.weare.ie/wp-content/uploads/2020/11/WHOIS-Services-Policy-Oct-20-Clean.pdf)	The contract between the Registrant and the Registry forms the legal basis for the Registry's processing of Personal Data related to .ie domain requests.	https://www.weare.ie/wp-content/uploads/2020/11/Data-and-Document-Retention-Policy-Oct-20-Clean-Version.pdf	A Natural Person Registrant may choose to allow its name to be published on the output from the WHOIS services for some or all of its .ie domain registrations, where the Registrant provides its explicit consent to this publication. The Registrant can revoke this consent to publication at any time.	https://www.weare.ie/wp-content/uploads/2020/11/WHOIS-Services-Policy-Oct-20-Clean.pdf	https://www.weare.ie/technical-standards/#WHOIS
Italy	IT	Yes	Yes	In accordance with Regulation (EU) 2016/679, art. 1, art. 4 c.1 and Recital 14, the protection of personal data applies to natural persons, as was already provided for in art. 40, paragraph 2, let. B) of the law decree 6 December 2011, n. 201, converted, with amendments, by the law of 22 December 2011 n. 214. Legal persons, bodies or associations are no longer considered to be interested parties and therefore these categories of subject no longer possess the right to receive the information and the request for consent.	In the event of failure to consent to the publication of data by all the subjects referenced in the domain name (registrant, admin and tech), the query displays only the following data (e.g. query on port 43): Domain: esempio.it Status: ok Signed: yes Created: 2019-06-03 14:58:49 Last Update: 2019-06-03 14:58:50 Expire Date: 2020-06-03 Registrant Organization: hidden Admin Contact Name: hidden Organization: hidden Technical Contacts Name: hidden Organization: hidden Registrar Organization: ZZZ S.p.A. Name: ZZZ-REG Web: http://www.zzzreg.it DNSSEC: yes Nameservers dns1.esempio.it dns2.esempio.it	**3. Information and acquisition of consent regarding data treatment for registration of the domain name and for visibility on the Internet** In conformity with that indicated in Parag 23, "Data treatment and role of the Registrar", of the current Registry/Registrar contract, published on the .it Registry website (http://www.registro.it), the data of interested parties regarding registration and maintenance of domain names are collected by the Registrar. The Registrar must supply the Registrant with the information relative to the system of data treatment and purposes of the treatment, and obtain, if the Registrant is a natural person, their consent, on the basis of the indications supplied by the .it Registry by means of the Regulations of assignment and management of domain names under ccTLD.it. The giving of consent must be explicit for each single data treatment and must be communicated to the .it Registry in written form in the ways and terms specified in Parag. 14 "Obligations of documentation", of the current Registry/Registrar contract and by the Regulations of the ccTLD.it, and in accordance with the Regulation (EU) 2016/679, art 7. In accordance with Regulation (EU) 2016/679, art. 1, art. 4 c.1 and Recital 14, the protection of personal data applies to natural persons, as was already provided for in art. 40, paragraph 2, let. B) of the law decree 6 December 2011, n. 201, converted, with amendments, by the law of 22 December 2011 n. 214. Legal persons, bodies or associations are no longer considered to be interested parties and therefore these categories of subject no longer possess the right to receive the information and the request for consent. … -------------------- **5. WHOIS look-up service** In compliance with international protocols used for domain names, the .it Registry provides a WHOIS look-up facility. Using this service, typing a domain name registered under ccTLD.it brings up information regarding the domain name. The information relative to the registrations are in the DBNA, in conformity with the following. The information includes data relative to: 1. Registrant; 2. Administrative (admin) and technical (tech) contacts; 3. Registrar; 4. Technical and service information. The WHOIS service can be queried: 1. From the command line (visualization via query on port 43); 2. Via Web, using the website Registro.it. In this case, the query uses a CAPTCHA system. The Whois service via Web returns a wider set of information than can be queried from the command line. However, in both cases, the data visualized depend on whether or not consent has been given to publication of data and their visibility on the Internet that is by the Registrant and admin and tech contacts. … In the event of failure to consent to the publication of data by all the subjects referenced in the domain name (registrant, admin and tech), the query displays only the following data (e.g. query on port 43): Domain: esempio.it Status: ok Signed: yes Created: 2019-06-03 14:58:49 Last Update: 2019-06-03 14:58:50 Expire Date: 2020-06-03 Registrant Organization: hidden Admin Contact Name: hidden Organization: hidden Technical Contacts Name: hidden Organization: hidden Registrar Organization: ZZZ S.p.A. Name: ZZZ-REG Web: http://www.zzzreg.it DNSSEC: yes Nameservers dns1.esempio.it dns2.esempio.it (from: https://www.nic.it/sites/default/files/documenti/2019/Whois_policy_v.2.1_eng.pdf)	With reference to collecting and transferring data of interested parties involved in activities connected with the management of the .it Registry, the CNR, through the IIT-Registry, is Data Controller and the Registrar is Data Processor. In accordance with Art. 29 of Italian Legislative Decree 30 June 2003, n. 196, Code regarding personal data, through the contract between the Institute of Informatics and Telematics of the CNR - .it Registry and the Registrar, regarding the registration and maintenance of domain names within the ccTLD.it, the Registrar is nominated as Data Processor in relation to the following activities: 1) collection of essential data for registration of a domain name, respecting the technical rules RFC1591, ICP-1, ICP-2 and ICP-3, which regards the Registrant, the administrative and technical contacts that are necessary to ensure operation of the domain name, and obtaining consent to data treatment given by interested parties and recording this in the DBNA; 2) collection and maintenance of the data necessary for management operations regarding the domain name, as specified in the Regulations of assignment and management of domain names within ccTLD.it. By virtue of the abovementioned agreement, the Registrar is not permitted to carry out any other treatment of personal data controlled by the .it Registry. With the undersigning of the Registry/Registrar contract, the Registrar declares that he/she possesses the expertise, capacity and reliability to ensure full respect of the regulations in force regarding data treatment, including the profile relative to security as specified in Art. 29, Parag. 2, Law 196/2003.	https://www.nic.it/sites/default/files/archivio/docs/DBNA_and_WHOIS_Policy_V.2_0.pdf	Consent for data treatment, required for the registration of a domain name and data publication, is obtained in the following way: • registration form, in accordance with specifications in the Regulations of assignment and management of domain names under the ccTLD.it: the registration form, subject to prior communication of the information notice giving details of the data treatment, requires the Registrant to express consent to the treatment of data for the purposes of the registration and maintenance of a domain name together with consent to the public visibility of this personal data. Consent for the purposes of registration is mandatory, whilst the consent to public visibility of the personal data mentioned above is discretionary; • EPP transaction: by means of a specific EPP transaction, when entrusted to do so by a client and subject to prior communication of the information notice, the Registrar writes in the DBNA the data acquired using the registration form and the expression of consent to public visibility of data regarding registrant and contacts.	https://www.nic.it/sites/default/files/archivio/docs/DBNA_and_WHOIS_Policy_V.2_0.pdf	

Appendix A: Detailed Overview - 9 April 2021

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9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Latvia	LV	Yes	Yes	Domain name 1 Domain name 2 Status (registered) Domain name holder 3 Type – Legal person 4 Name of the organisation 5 Email 6 Phone 7 Address 8 Registration number Technical contact 9 Type Registrar (if the domain name is managed by Registrar) 10 Type – Legal person 11 Name of the organisation 12 Email 13 Phone 14 Address 15 Registration number Technical data 16 Domain name server	Domain name 1 Domain name 2 Status Domain name holder 3 Type – natural person Technical contact 4 Type Registrar (if the domain name is managed by Registrar) 5 Type 6 Name of the organisation 7 Email 8 Phone 9 Address 10 Registration number Technical data 11 Domain name servers	PUBLIC DATA If the domain name holder is a legal person, the WHOIS displays the following data: Domain name 1 Domain name 2 Status (registered) Domain name holder 3 Type – Legal person 4 Name of the organisation 5 Email 6 Phone 7 Address 8 Registration number Technical contact 9 Type Registrar (if the domain name is managed by Registrar) 10 Type – Legal person 11 Name of the organisation 12 Email 13 Phone 14 Address 15 Registration number Technical data 16 Domain name servers If the domain name holder is a natural person, the WHOIS displays the following data: Domain name 1 Domain name 2 Status Domain name holder 3 Type – natural person Technical contact 4 Type Registrar (if the domain name is managed by Registrar) 5 Type 6 Name of the organisation 7 Email 8 Phone 9 Address 10 Registration number Technical data 11 Domain name servers For the use in WHOIS, it is recommended for legal persons to create a designated email that does not contain employee's name and surname. The data not specified in this Policy are not public and are used solely for conclusion and performance of the agreement. These data can be obtained by third party in cases provided by law. Request should be made in writing and be pursuant to enactments of the Republic of Latvia. In order to contact the domain name holder who is a natural person, it is possible to use WHOIS communication form. (from: https://www.nic.lv/en/nic-whois-policy)	THE PURPOSE AND LEGAL BASIS FOR DATA PROCESSING Performance of the agreement pursuant to point (b) of the Article 6(1) of the General Data Protection Regulation. 3. NIC.LV is processing your data in order to conclude the agreement on the right to use the .LV domain name and ensure the performance of the agreement. In accordance with Article 1404 of the Civil Law of the Republic of Latvia in each lawful transaction the parties should be taken into account, therefore personal data processing is required in order to conclude the agreement. 4. NIC.LV website cookies are processed in order to ensure services in the NIC Online system. For more details see NIC Cookies policy. Legal obligation pursuant to point © of the Article 6(1) of the General Data Protection Regulation 5. NIC.LV can process your data if it is necessary for compliance with legal obligations to which NIC.LV is subject to, e. g., if NIC.LV receives a request to disclose your personal data to public authorities. 6. NIC.LV website logs your requests; these log files are needed in order to ensure proper functioning of the website, security of the services and early detection and prevention of information technology security threats, as well as to overcome and remedy the effects of security incidents.	https://www.nic.lv/en/nic-privacy-policy	2. WHOIS SERVICE: At present, if the domain name holder is a natural person, their name, surname, personal identity number and postal address is not publicly shown. In the future, to ensure GDPR compliance, the holders' telephone number and e-mail will not be published also. In order to provide some communication channel with the domain names' holder, NIC.LV will develop an electronic contact form.	https://www.nic.lv/en/amendments-to-lv-policy-and-rra	https://www.nic.lv/en/faq-registration
Liechtenstein	LI	No	No	Since 1 January 2021, personal data associated with registered domain names is no longer disclosed. Information about holders of domain names can only be obtained in exceptional cases.	Since 1 January 2021, personal data associated with registered domain names is no longer disclosed. Information about holders of domain names can only be obtained in exceptional cases.	Since 1 January 2021, personal data is no longer displayed when looking up .li and .ch domain names. Access to the personal data of the holder of a domain name is only granted on request, provided that the claimant individual or organisation proves their identity and substantiates an overriding legitimate interest in the requested data. Whether an overriding legitimate interest exists is determined on a case-by-case basis. A legitimate interest may exist if, for example: a holder or technical contact of the domain name wishes to review the current entry a domain name infringes trademark rights the content of a website infringes copyright or personality rights an authority, acting within its remit, requires the data to fulfil statutory responsibilities. The desire to purchase a domain name or to contact the operator of a website is not sufficient. (from: https://www.nic.li/whois/domaininfo/)	ICANN org did not expand upon non-EU country policies.		ICANN org did not expand upon non-EU country policies.		https://www.nic.li/terms/agb/#agb52

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Lithuania	LT	Yes	Yes	If domain holder is a legal entity – contact information is publicly available in WHOIS database in all cases, however, it is possible to choose for it to be available otherwise. Information published for domain holders that are a legal entity include domain name, creation date, expiration date, time of last update, technical contact information (except for a case when a domain holder has appointed a technical representative, where emails will be forwarded to the technical representative), registrar, and addresses of the Domain Name System's servers.	If domain holder is a natural person – personal data is not publicly available in WHOIS database, however, it is possible to choose their publishing and availability. Information that is published for domain names belonging to natural persons include the domain name, current domain status, creation date, expiration date, name and surname, website address, email address, and addresses of the Domain Name System's servers. Personal data of the data subjects are not published in WHOIS, except for the cases when data subject expressed his / her will to publish his / her personal data. Such expression of will, amongst other things, is accreditation as individual registrar, settings in the domain holder's DAS account regarding accessibility of his / her personal data for WHOIS review, specification of the person's name in the name of .lt second level domain or in the name of the legal entity, which are public by nature.	WHAT IS THE PROCEDURE OF DATA PUBLICATION IN WHOIS DATABASE? If domain holder is a legal entity – contact information is publicly available in WHOIS database in all cases, however, it is possible to choose for it to be available otherwise. If "WEB WHOIS only" availability is selected in the settings, contact information is displayed only on the website www.domreg.lt/whois. If "Both WEB and text WHOIS" availability is set, contact information is displayed on the website www.domreg.lt/whois and available via character user interface for various internet robots or machines performing automated search functions. If domain holder is a natural person – personal data is not publicly available in WHOIS database, however, it is possible to choose their publishing and availability (as previously indicated). For this purpose, your account on the website www.domreg.lt/registrant has to be activated. If you want to make your personal data publicly available: 1. Login to your account on the website www.domreg.lt/registrant, by entering the identifiers (domain holder's ID, i.e. RN[number], and password). 2. Select menu item "My information". 3. At the "Registrant contact information" section click the link "Public shown personal information". 4. Select the information to be displayed and its availability in the drop box. 5. Click the button "Change". Domain holder is a natural person who has chosen to publicly announce his/her personal data, simultaneously expresses consent to make these data publicly available in WHOIS database and cannot make claims in this regard. Consent cannot be revoked when domain holder who is a natural person changes settings in the personal account. (from: https://www.domreg.lt/en/faq/for-domain-registrants/what-is-the-procedure-of-data-publication-in-whois-database/)	LEGAL FRAMEWORK OF DATA PROCESSING 13. Register and procedural data processing are conducted while guaranteeing the processing of the register. According to the definition provided in subparagraph 2.1 of the "Identification methodology for critical information infrastructure", approved by Resolution of the Government of the Republic of Lithuania No. 818 "On implementation of the Law on Cyber Security of the Republic of Lithuania" of 13 August 2018, data controller is the entity which registers and administers the second level domain names under .lt. Register would not function without containing the structured data on the register's objects – .lt second level domains and persons responsible for the domains. Proper functioning of the register is in line with the public interest, as well as interests of data processors, data controller and third parties whose rights can be violated in relation to the creation and / or management of .lt second level domains. 14. The data of individual data recipients are processed for the purposes of the performance of orders in the cases of one-off provision of register data.	https://www.domreg.lt/informacija/dokumentai/privacy-policy.pdf	18. Personal data of the data subjects are not published in WHOIS, except for the cases when data subject expressed his / her will to publish his / her personal data. Such expression of will, amongst other things, is accreditation as individual registrar, settings in the domain holder's DAS account regarding accessibility of his / her personal data for WHOIS review, specification of the person's name in the name of .lt second level domain or in the name of the legal entity, which are public by nature.	https://www.domreg.lt/informacija/dokumentai/privacy-policy.pdf	https://www.domreg.lt/en/faq/for-domain-registrants/what-is-the-procedure-of-data-publication-in-whois-database/
Luxembourg	LU	Yes	Yes	Only the name and address of the registrant as legal person and the name servers (if any) are published together with the registrar in charge of the management of the domain name in question. No contact data are publicly available. This information is supplied by the applicant/manager and is available under certain conditions through the WHOIS service where it can be consulted by any Internet user.	Personal data is processed in compliance with General Data Protection Regulation (GDPR) and data of private persons are not public. Personal identification data of the holder will not be accessible on the website if the holder registered the domain name solely as a private person. Except as noted above, the holder's country of residence is always published whereas domain name contacts' details are per default not published.	What details are published and why? Only the name and address of the registrant as legal person and the name servers (if any) are published together with the registrar in charge of the management of the domain name in question. No contact data are publicly available. This information is supplied by the applicant/manager and is available under certain conditions through the WHOIS service where it can be consulted by any Internet user. Personal data of natural persons are by default not published in compliance with GDPR. Entering into contact with a registrant as natural person and contacts only possible upon request through dns.lu web site in case of technical and/or legal issues in relation with the domain name. It is under the responsibility of the registrant to accept or deny such a request. (from: https://www.dns.lu/en/support/faq/general-info/19/)	The Purpose and Legal Basis for Data Processing Performance of an agreement DNS-LU is processing your data in order to enter into an agreement to register and manage a domain name under the top-level domain .lu and to ensure the due and proper performance of the underlying contractual provisions. Performance of an agreement may only be performed while taking into account and processing data of parties involved. Purpose of the processing pursuant to point (b) of the Article 6(1) of the General Data Protection Regulation. Legal obligation DNS-LU can process your data if it is necessary to comply with legal obligationsand/or within the framework of legal proceedings to which DNS-LU might be subject to, e.g., if DNS-LU receives a notification to disclose or transmit your personal data to jurisdictional or governmental authorities. Purpose of the processing pursuant to point (c) of the Article 6(1) of the General Data Protection Regulation. Legitimate interests DNS-LU can process your data where it is strictly necessary for the purpose of safeguarding the legitimate interests pursued by DNS-LU or by a third party for preventing fraud, cyber-attacks, network & information security reasons and for ensuring your data integrity as domain holder in relation with domain name registration, provided that your interests or fundamental rights and freedoms are not overriding, taking into consideration the reasonable expectations based on your relationship with the data controller. Purpose of the processing pursuant to point (f) of the Article 6(1) of the General Data Protection Regulation.	https://www.dns.lu/media/content/pdf/EN_Privacy_notice.pdf	In a second phase, we will introduce an opt-in for revealing personal data on the web-based WHOIS only.	https://www.dns.lu/en/support/general-information/gdpr/	https://www.dns.lu/en/support/domainname-availability/whois-gateway/

**Appendix A: Detailed Overview of
European ccTLD Operators Handling of
Legal vs. Natural Person Data**

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Malta	MT	Yes	No	There is no distinction bewtween the publication of legal and natural persons.	There is no distinction bewtween the publication of legal and natural persons.	8. The whois service

8.1 Unless you indicate otherwise as per condition 8.2, you hereby agree to the publication, through the whois service, of your contact details including personal details, as submitted to us by yourself. For further details about the purposes and usage possibilities of the whois service, please see https://www.nic.org.mt/whois.

8.2 If you do not wish your contact details to be made available through the whois service, you may indicate this either:

during registration by ticking the appropriate box and appointing an Administrative Agent whose details would appear on your behalf; or

by sending e-mail to datacontroller nic.org.mt

8.3 You hereby fully agree that your Administrative Agent has the right to access, at any time, your full contact details as well as those relating to any Billing and Technical Agents whom you may further appoint.

8.4 If you appoint any Agent then the warranty laid down in condition 7.1 above shall apply.

(From: https://www.nic.org.mt/terms/) | Other than as stated in this Privacy Policy, we do not transfer personal data relating to you to any third party without your prior consent or unless we are otherwise authorised or obliged to make any such transfer by law.

However, we do reserve the right to disclose personal data as may be necessary in order to:

protect against abuse, misuse or unauthorised use of our website;

protect the personal safety or property of our customers and users (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else, we shall disclose any information we may have about you in our possession so as to assist any type of investigation into your actions);

provide you with a particular service that you may request; or

perform any contract you may have entered into with us. | https://www.nic.org.mt/privacy/ | ICANN org was unable to find .MT's policies with regard consent to publication of natural person data. | | |
| Netherlands | NL | Yes | Yes | If the registrant is a business, the name, in addtional to the email address, is shown as well, and the registrant can choose to give an address. | The only information about a private registrant given in the Whois is the administrative contact's e-mail address. | Why is information about you visible in the Whois?

Around the world, it's usually possible to look up details of registered domain names. We allow the look-up of very limited information about .nl domain names. The only information about a private registrant given in the Whois is the administrative contact's e-mail address. If the registrant is a business, the name is shown as well, and the registrant can choose to give an address. You can use information from the Whois for the following:

-To sort out technical problems that affect how the internet works
-To trace the registrant of a .nl domain name you would like to acquire
-To protect intellectual property rights
-To stop illegal and harmful content being put on the internet, or to get it taken down

You can ask to opt out of sharing info about yourself

Do you have a special reason for not wanting the Whois to show even the small amount of info about you that would normally be available? (That's your e-mail address and, if you are a business registrant, your name.) If so, you can ask to opt out of sharing your personal details. The situations in which you're allowed to opt out and the procedure for opting out are described on the Opt-out request page.

Full contact details

In the Whois, you can look up certain details about a registered .nl domain name, including the e-mail address of the administrative contact person for the registrant. We also keep a few other pieces of information, which aren't visible in the Whois:

-The registrant's name (not in the Whois if the registrant is a person)
-The registrant's address
-The name and phone number of the administrative contact for the domain name
-The name and phone number of the technical contact for the domain name

(from: https://www.sidn.nl/en/nl-domain-name/sidn-and-privacy) | 3. Justification for processing in the form of publication in the Whois
With all personal data made available in the Whois, processing is necessary for protection of the legitimate interests of SIDN (as the data controller), or those of the data subject, or those of a third party insofar as we consider that, in the particular circumstances, the third party's interests outweigh the data subject's interest in privacy protection founded upon his or her fundamental rights and freedoms.
In cases where the registrant is a natural person, implying that all associated registry data is personal data, the data made available in the Whois and the purposes for which that data is made available are as specified below. Where standalone personal data is made available, details are provided. | https://www.sidn.nl/downloads/c5RqbmyqTFKSvIZOzffcNg/5f76 9b64563b3fe45 199dda75f7e10 a1/Privacy_Poli cy_for_nl_Dom ain_Names.pdf | The only information about a private registrant given in the Whois is the administrative contact's e-mail address. [...] You can ask to opt out of sharing info about yourself Do you have a special reason for not wanting the Whois to show even the small amount of info about you that would normally be available? (That's your e-mail address and, if you are a business registrant, your name.) If so, you can ask to opt out of sharing your personal details. The situations in which you're allowed to opt out and the procedure for opting out are described on the Opt-out request page. | https://www.sidn.nl/en/nl-domain-name/sidn-and-privacy | |

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Norway	NO	No	Yes	Users who look up a domain name obtain basic information about the registration itself: -The domain name -DNSSEC information -When the registration was created -When the registration was last updated If the domain holder is an Organizations additional information is published: -Organization number -Organization Name -E-mail Address -Postal Address -"Norway" -(Telephone Number) If the domain holder is an Sole Proprietorship additional information is published: -Organization Number -Organization Name -E-mail Address -"Norway" Basic information about name servers (machines that answers requests for addresses under the domain) and the registrar is also provided.	Users who look up a domain name obtain basic information about the registration itself: -The domain name -DNSSEC information -When the registration was created -When the registration was last updated If the domain holder is an individual, the e-mail address and "Norway" is also published. Basic information about name servers (machines that answers requests for addresses under the domain) and the registrar is also provided.	Users who look up a domain name obtain basic information about the registration itself: The domain name DNSSEC information3 When the registration was created When the registration was last updated A domain look-up also provides information about the domain holder, technical contacts, name servers (with optional technical contacts) and the registrar. Different amounts of information are given about the domain holder depending on whether they are an organisation, a sole proprietorship or a private individual. A Domain holder: Organisation Organisation number Organisation name E-mail address Postal address «Norway» (Telephone number) A Domain holder: Sole proprietorship Organisation number Organisation name E-mail address «Norway» A Domain holder: Private individual E-mail address «Norway» A look-up also provides contact information for technical contacts for the registration, so that these can be contacted if the domain is used in such a way that it threatens the functionality, security and stability of other domains or the internet as an infrastructure. N Name server Name IP-address N Technical contact Role description E-mail address Country (Telephone number) A Registrar Organisation name E-mail address Postal address Country (Telephone number) (Web site) Basic information about name servers (machines that answers requests for addresses under the domain) and the registrar is also provided. (from: https://www.norid.no/en/domeneoppslag/personvern/domeneoppslag/)	ICANN org did not expand upon non-EU country policies.		ICANN org did not expand upon non-EU country policies.		
Poland	PL	Yes	Yes	Data are published in order to respect the rights of Internet users, owners of trademarks, copyrights and other legally protected interests. In accordance with the provisions of the data protection law, the data of registrants, who are natural persons, are not published.	Data are published in order to respect the rights of Internet users, owners of trademarks, copyrights and other legally protected interests. In accordance with the provisions of the data protection law, the data of registrants, who are natural persons, are not published.	Data are published in order to respect the rights of Internet users, owners of trademarks, copyrights and other legally protected interests. In accordance with the provisions of the data protection law, the data of registrants, who are natural persons, are not published. (from: https://www.dns.pl/en/whois/FAQ) The .pl domain name maintenance service consists in particular in the Client's demand that the Registry makes public the provided information concerning the domain name, by making it available to all Internet network users. This applies also to the Data published in the WHOIS database. Thus the information made available this way can reach recipients in any country, also outside the European Economic Area (EEA), where the level of information protection may be lower than in the EEA. The provision of information this way is necessary to perform the agreement between you and the Registry, because it is not possible to carry out this service in any other way, considering the rules of operation of the Internet network. This, however, does not apply to your Identification Data, which is not published in the WHOIS database, if the Client marked their status in the Registry as a "natural person". The rule for such Client's Personal Data is that the Registry and the Registrar process the data without making them public. Sharing of your Personal Data between us and the Registrar is necessary to perform the agreement between you and us, as well as to carry out activities to execute the same, regardless of the country, where the Registrar of your choice has its registered office or operates a business. This applies also to your Data, if you turn directly to us (e.g. in connection with a complaint). Such data will be transferred to the Registrar, unless you turn to us in a matter, which is not related to the Registrar's operations. We provide Personal Data when requested by third parties and this is necessary for the purposes of the legitimate interests pursued by such parties, e.g. to take actions aimed at the protection of their legally protected interest, by means of court proceedings. We also provide Personal Data to courts and authorised authorities, if they make such a request under applicable laws. We transfer the Data to our providers who process them on our behalf, when providing us with services of technical nature, handling our ICT network or our ICT systems, or making ICT tools available to us, providing us with audit services or legal assistance, as well as other personal data controllers, e.g. entities which conduct post or messenger business. (from: https://www.dns.pl/en/privacy_policy)	The Clients' data are processed to execute and perform the agreement.	https://www.dns.pl/en/privacy_policy#policy	It is very important that we will not publish the Client's Identification Data in the WHOIS database, if the Client marked their status in the Registry as a "natural person". This is always done by you, in co-operation with your Registrar. If you do not want your Identification Data to be published in the WHOIS database, you should select the "natural person" status. We do not publish your Personal Data, which are related to the provision of the service in accordance with the Regulations of option for registration of a domain name.	https://www.dns.pl/en/privacy_policy#policy	

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

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Portugal	PT	Yes	Yes	Data published for .PT domain names belonging to Legal Persons: -Domain Name -Creation Date -Expiration Date -Status -Registrant/Owner Name -Registrant/Owner Address -Registrant/Owner E-mail -Registrar/Managing Entity Name -Registrar/Managing Entity Email -Nameserver Information	Data published for .PT domain names belonging to Natural Persons: -Domain Name -Creation Date -Expiration Date -Status -Registrant/Owner Name (only with consent) -Registrant/Owner Address (only with consent) -Registrant/Owner E-mail (only with consent) -Registrar/Managing Entity Name (only with consent) -Registrar/Managing Entity Email (only with consent) -Nameserver Information	In this context, taking into account the provisions of GDPR, the recommendations issued by organisations such as CENTR – Council of European National Top-Level Domain Registries, ICANN – Internet Corporation for Assigned Names and Numbers and RIPE – Network Coordination Center, as well as the models adopted by various reference peers, from 25 May the personal data in the .PT WHOIS service will be made available based on the informed and free consent, explicitly expressed by the relevant data subjects, and governed by the following principles: I. Following registration of a .pt domain name, the following data shall be disclosed in WHOIS: Fig. 1. (see: https://www.dns.pt/en/data-protection/pt-whois-policy/) II. With regard to data collected, the personal data of contact persons associated with the domain names shall not be disclosed, unless they express their free, specific, informed and explicit consent to this end, consenting that their personal data be publicly disclosed through the WHOIS protocol, at whois.dns.pt and through the web, such as at www.dns.pt; III. Upon registration of a domain name, a declaration of consent shall be made available, which may be signed by the data subject, to which end he/she should follow the instructions given upon registration of the relevant domain. IV. The data subject may withdraw his/her consent at any time, accessing his/her reserved area online. The data subject may also, at any time and if applicable, elect to express his/her consent to the publication of his/her personal data by following the same procedure; V. For domains submitted and managed by accredited registrars, these entities shall be responsible, pursuant to and for the purposes of the protocol entered into with .PT, for obtaining, exhibiting and supplying, upon request, the declaration of consent subscribed by the data subject; VI. Should the data subject not give his/her consent, an anonymised contact option, intended for general contact purposes and possible breaches or abuse, will be offered in the web version available at www.dns.pt. .PT will not intervene in this process, having no access to the communications, or their content, effected in this way; VII. Only data of validly registered domain names shall be presented; VIII. For registrations effected before 25 May, .PT endeavoured to obtain the consent of the data subject for disclosure of his/her data in WHOIS. Data for which no consent has been obtained shall not be disclosed; IX. Court authorities, ARBITRARE, entities to which the law assigns powers in respect of criminal investigation or whose mission is to oversee or ensure compliance with the legislation applicable, in particular, to the protection of consumer rights, intellectual property, communications, security, public health and trade practices in general may request access to personal data not accessible to the public through WHOIS, by means of a notice addressed to .PT. In order to ensure a holistic, systematic and clear view of the processing of personal data carried out by .PT, this policy should be analyzed complementarily and jointly with our Privacy Policy. (from: https://www.dns.pt/en/data-protection/pt-whois-policy/)	Lawfulness of the Processing In this scope, .PT process your personal data based on the following grounds of lawfulness: • In the scope of pre-contractual procedures requested or already within the scope of the contractual relationship arising from the registration of a .pt domain and the management of the contractual relationship, which include, among others, the contacts, via web platform, email and/or telephone for notifications, clarification of questions or conducting surveys of satisfaction and evaluation of the services provided. • If you have obtained your consent, as data subject, to process them based on specific, explicit and legitimate purposes, including to allow registration at our events, training and other initiatives; • When it is necessary for the fulfillment of legal obligations that apply to it; • For the pursuit of legitimate interests of the .pt, which includes, in particular, the need to develop and maintain the present site with the quality and security intended, contribute to the prevention and detection of fraud, allow notification of situations or associated events to the security of the .pt, the networks or the information (in particular through the mechanism of contact via email abuse@dns.pt).	https://www.dns.pt/en/privacy-policy/	II. With regard to data collected, the personal data of contact persons associated with the domain names shall not be disclosed, unless they express their free, specific, informed and explicit consent to this end, consenting that their personal data be publicly disclosed through the WHOIS protocol, at whois.dns.pt and through the web, such as at www.dns.pt; III. Upon registration of a domain name, a declaration of consent shall be made available, which may be signed by the data subject, to which end he/she should follow the instructions given upon registration of the relevant domain.	https://www.dns.pt/en/data-protection/pt-whois-policy/	
Romania	RO	Yes	Yes	Information displayed for legal persons, holders of a domain name consists of: Entity name Address City / Town Prefecture / County Country Telephone number Fax number E-mail address	Information related to natural persons, holders of a domain name are not published.	Ever since the .ro zone was established in 1993, we have taken very seriously our role of personal data operator. Thus, according to the national legislation, we notified the Romanian PDA - National Supervisory Authority for Personal Data Processing - and were registered into the National Registry for Personal Data Operators under entry number 10458. Furthermore, we developed a series of measures in order to enhance the security related to the personal data we process: We store the personal data on domestic servers, ensuring an improved security; We conduct internal audit actions, based on predefined parameters, in order to evaluate the level of security of the personal data; We have designated an officer in charge of personal data protection (RPD); We use secured e-mail to transmit copies of personal data to the data subjects, in case we receive data access requests. If you want to register a domain name and you worry about having your private e-mail address published, at registration time you can use an operational e-mail address that does not identify you personally. If you hold a domain name and you worry about having your private e-mail address published, you can contact you Registrar in order to update you data, or you can use the on-line administration interface made available on our site. In certain cases we might have to provide certain personal data belonging to .ro domain name holders to third parties (public authorities, national or international bodies), based on a legitimate interest the parties have in order to fulfil their legal duties, but complying with provisions of the General Data Protection Regulation 2016/679 (GDPR). Any solicitation from such parties, regarding personal data, will be thoroughly analysed before being processed. All correspondence containing copies of personal data will be carried out in a secure manner. Our Confidentiality Policy describes these aspects in detail. Briefly, we have adopted GDPR as follows: Information regarding Personal Data Protection within .ro domain name Registry (RoTLD). Confidentiality Policy can be consulted here (link), including information related to the processed types of data, purpose, and how we do the processing. Cookie Policy adapted to GDPR requirements can be found here (link) Personal data available on the WHOIS on-line platform is as follows: Information displayed for legal persons, holders of a domain name consists of: Entity name Address City / Town Prefecture / County Country Telephone number Fax number E-mail address Information related to natural persons, holders of a domain name are not published. Holders of a .ro domain name can visualize their data through the on-line administration interface available on our website. If you have any questions regarding the processing of your personal data related to .ro domain names, please contact us using the Contact Form on our website. (from: https://www.rotld.ro/personal-information-data/)	The legal basis of processing personal data - European General Data Protection Regulation (art. 6, par. 1, let. b, c, d, e) - Government Resolution no 1621 of 23.12.2003, regarding the organisation and functioning of the National Institute for Research & Development in Informatics - ICI Bucharest, completed by - Emergency Ordinance No. 22 of March 11, 2009, art. 2, par (1), let. (o) stipulating that the activity of the Institute comprises "o) organising, administering and managing the ".ro" TLD (top level domain), and functioning as the registry for ".ro" domain names;" - IANA (INTERNET ASSIGNED NUMBERS AUTHORITY) Accreditation by designating ICI Bucharest as ".ro" domain names administering registry. - The contract concluded between you and .ro domain names Registry at the time of registering a domain name	rotld.ro/informare-privind-protectia-datelor-cu-caracter-personal/	6. WHO HAS ACCESS TO THE INFORMATION WE COLLECT FROM YOU By way of exception from the above cases, ICI BUCHAREST, through ROTLD, will not disclose any personal identifiable information related to its users, to third parties, without prior express user consent in this regard.	https://www.rotld.ro/politic%C4%83-de-confiden%C8%9Bialitate-a-datelor/	https://www.nic.ro/gdpr/ https://www.nic.ro/help/domflow.html, https://www.nic.ro/domain-template.txt

Appendix A: Detailed Overview of European ccTLD Operators Handling of Legal vs. Natural Person Data

9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Slovakia	SK	Yes	Unclear	If the holder is a legal entity, email, phone & fax on contact type legal person may be published. Registrar might unhide it.	If the holder of a domain (registrant) is a natural person (not entrepreneur) only his/her ID will be shown so as to protect his/her personal data, while his/her name and surname, address, phone and e-mail will be anonymised If the holder is a person, only his / her ID will always be displayed for privacy reasons, while the surname, address, phone, and email will be anonymised, independently from any public policy setting (so-called "disclose" in the EPP or checkbox window when contacting in Contacts).	If the holder of a domain (registrant) is a natural person (not entrepreneur) only his/her ID will be shown so as to protect his/her personal data, while his/her name and surname, address, phone and e-mail will be anonymised If the holder is a person, only his / her ID will always be displayed for privacy reasons, while the surname, address, phone, and email will be anonymised, independently from any public policy setting (so-called "disclose" in the EPP or checkbox window when contacting in Contacts). If the holder is a legal entity, email, phone & fax on contact type legal person may be published. Registrar might unhide it. (from: https://sk-nic.sk/en/faq/)	8.2.3 the purposes of the processing of the personal data according to point 8.2.1 and legal basis of SKNIC for this processing are: a) recordings of the User in the Register and related conclusion of contracts as defined by the Terms and Conditions (in particular the Domain Name Contract and Registrar contract) and exercise of rights and fulfillment of obligations resulting from them – legal basis for this processing is based upon fulfillment of contracts as defined by the Terms and Conditions and execution of the proceeding prior the contracts conclusions, b) provision of the personal data to a person that demonstrates to SK-NIC legitimate interest to collect data from the Register in the necessary extent for the purpose of demonstration, exercitation and advocacy of legal claims of this person – legal basis for this processing is based on the legitimate interest of SK-NIC to ensure compliance with the Terms and Conditions and legitimate interest of the third person to demonstrate, exercise and advocate its legal claims, c) provision of the personal data to ADR Centre if these data are necessary to plead and decide cause according to the ADR Rules – legal basis for this processing is based on the legitimate interest of SK-NIC and of ADR Centre to ensure compliance with the Terms and Conditions and ADR Rules, d) processing of the User data that are not necessary to fulfill the contracts according to the Terms and Conditions, but the User has provided them to SK-NIC mainly to ensure communication with SK-NIC within exercise of rights and fulfilling of the obligations according to the Terms and Conditions, and also for the purpose to identify the User within demonstration, exercitation and advocacy of its legal claims – legal basis for this processing is based on the communication provision with the User and legitimate interest of the user to ensure demonstration of its identification within communication with SK-NIC and also in relation to demonstration, exercitation and advocacy of its legal claims, e) creation of the zone file TLD .Sk backup and data on TLD .Sk name space in encrypted form according to the SK-NIC obligation resulting from the cooperation agreement No. 749/130/2006 concluded on June 5, 2006 with the Deputy Prime Minister's Office for Investments and Informatization of the Slovak Republic – legal basis for this processing is based on legal interest of the Slovak Republic to create and preserve backup of the TLD .Sk zone file, and also on legal interest of SK-NIC to comply with its obligations in top level domain name .sk management, f) publicization of personal data via specific service for data publicization (for example WHOIS) – legal basis for this processing is based on the consent of the User expressed via appropriate technical setting.	https://sk-nic.sk/wp-content/uploads/2019/10/Pravidla_2019_10_21_final_EN.pdf	8.2.6 SK-NIC does not publish personal data according to point 8.2.4 of the User that is natural person non-enterpreneur, unless the User marks the data, where it is so allowed, as public. Public data are published via specific service to publish data (for example WHOIS). Non-publicization of the data doesn't touch right of SK-NIC to record and process such data according to the Terms and Conditions and due to technical reasons necessary for Register operation to any Registrar, including Registrars seated outside of the Slovak Republic, or to other persons according to the Terms and Conditions; SK-NIC publish contact dat of the Registrar in extent necessary according to the Terms and Conditions and to the Registrar contract,	https://sk-nic.sk/wp-content/uploads/2019/10/Pravidla_2019_10_21_final_EN.pdf	
Slovenia	SI	Yes	Yes	13.2. By registering a Domain name, a Domain name holder authorizes the Registry to publish data of Domain name, Domain name holder and technical contact person via WHOIS. 13.3. If a Domain name holder is a natural person, only electronic mail address shall be published in WHOIS. Other data can be disclosed upon Domain name holder's request.	13.2. By registering a Domain name, a Domain name holder authorizes the Registry to publish data of Domain name, Domain name holder and technical contact person via WHOIS. 13.3. If a Domain name holder is a natural person, only electronic mail address shall be published in WHOIS. Other data can be disclosed upon Domain name holder's request.	13. WHOIS 13.1. Registry provides WHOIS search service (WHOIS) enabling the data to be found on the Domain name holder and other details of the Domain name, with the purpose of transparency and stability of Domain name system under .si. 13.2. By registering a Domain name, a Domain name holder authorizes the Registry to publish data of Domain name, Domain name holder and technical contact person via WHOIS. 13.3. If a Domain name holder is a natural person, only electronic mail address shall be published in WHOIS. Other data can be disclosed upon Domain name holder's request. 13.4. The Registrar shall be obliged to inform natural persons submitting Domain name registration requests of the possibility of creating and using a special function electronic mail address for publication in WHOIS for an individual object type. This electronic mail address is an alternative to the use of the personal email address, and is unrelated to any personal data. 13.5. Data obtained via the WHOIS search service are exclusively informative in nature. By submitting a WHOIS query users agree to the terms of use detailed on Registry web page. (from: https://www.register.si/wp-content/uploads/general-terms.pdf)	11.2. The legal basis for the collection and processing of personal data is the Domain name registration contract concluded on registration of a Domain name between Registry and the Domain name holder. The Domain name holder shall have the right to inspect, copy, supplement, correct, block and delete personal data relating to him or her.	https://www.register.si/wp-content/uploads/general-terms.pdf	13.3. If a Domain name holder is a natural person, only electronic mail address shall be published in WHOIS. Other data can be disclosed upon Domain name holder's request.	https://www.register.si/wp-content/uploads/general-terms.pdf	https://www.register.si/en/privacy-statement/
Spain	ES	Yes	Unclear	Domain name and associated owner	Domain name and associated owner	• ¿Qué datos se muestran? Actualmente se muestran los datos del nombre de dominio y el titular asociado (se actualizará por parte de Red.es si hay cambios). Translation (Google Translate): • What data is shown? Currently the data of the domain name and the associated owner are displayed (it is will update by Red.es if there are changes). (from: https://www.dominios.es/sites/dominios/files/es_Procedimiento%20de%20alta%20servicio%20whois%20puerto%2043%20v4_cambio%20sede%20(ult).pdf)	The purpose of the collection and processing of personal data is the management, provision, expansion and improvement of services rendered to the internal/external interested parties/users/stakeholders. Of Red.es, as indicated in the following document (click on link): Privacy Policy, which aims to establish the guidelines and principles that will govern the way in which Red.es will manage and protect the privacy of personal data to help ensure compliance with the laws and regulations applicable to the collection, storage, use, transfer, disclosure to third parties and the retention of personal and/or confidential data.	https://www.red.es/redes/en/quienes-somos/personal-data-protection	ICANN org was unable to find .ES's policies with regard to publication of natural person data.		https://www.red.es/redes/en/quienes-somos/personal-data-protection

Appendix A: Detailed Overview - 9 April 2021

Country	ccTLD	European Union?	Appears to differentiate between Natural & Legal Person Data? Y/N	Legal Person Data Published (see Column H for more details)	Natural Person Data Published (see Column H for more details)	Direct Policy Statement (including link to source)	Legal Basis for Data Processing (as identified in the relevant policy)	Link to Policy	Policies regarding Consent to Publish Natural Persons Data	Link to Policy	Additional Resources (as applicable)
Sweden	SE	Yes	Yes	5.1.2 Search on contact-ID - when the registrant is a legal entity IIS usually publishes the information below in WHOIS when the user searches on a Contact ID and the registrant is assumed to be a legal entity. If any information is missing, this is marked with a dash. If a search is made via the Whois protocol, the user is instead referred to IIS Web whois. • Contact ID - Contact ID, the contact's identifier in the system • org – Company name • orgno – Corporate Registration Number • street 1-3 – postal address • postalcode – zip code • state/province - State/province • city - City • country - Country/country code • phone – Telephone number • fax – Fax number • created - Date when the contact was created • modified - Date for most recent change for the contact • Status, "ok" or "inactive" – If the contact is connected to any domain or not • registrar – The registrar who manages the contact	4.3.2 Opt-in/Opt-out - Through opt-in/opt-out, the registrant is able to show certain contact information or conceal certain information. This choice is only available for natural persons because IIS interpretation of the Top-level Domain Act is that the contact information for legal entities must always be shown except contact person and email address. Registrants who are natural persons can make their choices through their registrar. However, it must be said that contact details for natural persons are concealed as a standard practice. 5.1.1 Searching on domain names in whois - When the user searches on a .se or a .nu domain name, the following information is displayed in WHOIS: • State – the status of a domain name. • domain – The domain name in question • holder - Contact ID for the registrant • admin-c - Contact ID for any administrative contact person • tech-c - Contact ID for any technical contact person • billing-c - Contact ID for any billing contact • nserver – Name server • created – Registration date • expires - Date of registration period's expiry • transferred – Date when the domain name changed registrar • modified - Date for the most recent change for the domain name • status, "ok" or "inactive" – If the domain name has any name servers stated or not • registrar – The registrar that administers the domain name 5.1.3 Search on contact-ID - when the registrant is a natural person When the registrant is a natural person (including sole proprietorship) and the user searches on Contact ID, no contact information is displayed unless the registrant has explicitly requested such a treatment. When searching on Contact ID via Web whois, the comment "not shown" is displayed after each field. If the search is made using the Whois protocol, the user is referred to IIS Web whois.	Opt-in/Opt-out Through opt-in/opt-out, the registrant is able to show certain contact information or conceal certain information. This choice is only available for natural persons because IIS interpretation of the Top-level Domain Act is that the contact information for legal entities must always be shown except contact person and email address. Registrants who are natural persons can make their choices through their registrar. However, it must be said that contact details for natural persons are concealed as a standard practice. IIS deems this to be a more appropriate approach than the opposite in view of personal integrity and the importance of protecting personal data. Identification of natural persons and legal entities Anyone applying for registration of a domain name under the top-level domain .se or .nu is requested that they, in connection with the application, provide certain information, including a corporate registration or personal identity number, name and/or company name. In relation to the applicant's name, there are two fields. The first is "Name" and the second is "Company". Both fields can be completed or only the "Name field." If the applicant provides a Swedish personal identity number and only completes the "Name" field, it is assumed that the registration pertains to a private individual (natural person). If the applicant provides a Swedish personal identity number and completes both the "Name" and "Company" fields, it is assumed that the registration pertains to a sole proprietorship. However, in terms of personal data, IIS treats a sole proprietorship as a natural person. If the applicant provides a Swedish corporate registration number, the "Company" field is compulsory. In these cases, it is assumed that the applicant is a company (legal entity). Search on contact-ID - when the registrant is a natural person When the registrant is a natural person (including sole proprietorship) and the user searches on Contact ID, no contact information is displayed unless the registrant has explicitly requested such a treatment. When searching on Contact ID via Web whois, the comment "not shown" is displayed after each field. If the search is made using the Whois protocol, the user is referred to IIS Web whois.	The Swedish Internet Foundation collaborates with Registrars for the registration and sale of domain names. Registrars perform registration services under agreement between The Swedish Internet Foundation and the Registrar. The Swedish Internet Foundation receives personal data from the Registrars in order to maintain a correct Domain Name Register. The Swedish Internet Foundation discloses personal data to these Registrars, for example, where they have registered a Domain Name according to the agreement with you, if a Domain Name is to be transferred to another, or to ensure proper information about the Domain Holder. The Swedish Internet Foundation's assigned Domain Name Register is made available on the Internet through a Domain Name search service (WHOIS). When searching in WHOIS, information about the domain name is being displayed. If the Domain Holder is a natural person or individual company, no personal data is displayed in the search result. If the Holder is a legal person, neither the contact person's name nor email address will be shown in the search result, as this information may constitute personal data. If you choose to register a domain name containing your personal data, the domain name will appear in WHOIS. The Swedish Internet Foundation may disclose data from the Domain Name Register to third parties if disclosure is required to fulfil obligations under law, regulation or decision. The Swedish Internet Foundation may also disclose personal data if it is necessary to meet a third party's legitimate interest to access the information. This mainly applies to information that is needed to identify or contact a Domain Name Holder.	https://internetstiftelsen.se/app/uploads/2019/02/integritetspolicy-nu-eng.pdf	4.3.2 Opt-in/Opt-out - Through opt-in/opt-out, the registrant is able to show certain contact information or conceal certain information. This choice is only available for natural persons because IIS interpretation of the Top-level Domain Act is that the contact information for legal entities must always be shown except contact person and email address. Registrants who are natural persons can make their choices through their registrar. However, it must be said that contact details for natural persons are concealed as a standard practice.	https://internetstiftelsen.se/docs/service_description_whois_en1.pdf	https://internetstiftelsen.se/docs/service_description_whois_en1.pdf
Switzerland	CH	No	No	Since 1 January 2021, personal data is no longer displayed when looking up .ch and .li domain names. Access to the personal data of the holder of a domain name is only granted on request, provided that the claimant individual or organisation proves their identity and substantiates an overriding legitimate interest in the requested data.	Since 1 January 2021, personal data is no longer displayed when looking up .ch and .li domain names. Access to the personal data of the holder of a domain name is only granted on request, provided that the claimant individual or organisation proves their identity and substantiates an overriding legitimate interest in the requested data.	Since 1 January 2021, personal data is no longer displayed when looking up .ch and .li domain names. Access to the personal data of the holder of a domain name is only granted on request, provided that the claimant individual or organisation proves their identity and substantiates an overriding legitimate interest in the requested data. Whether an overriding legitimate interest exists is determined on a case-by-case basis. A legitimate interest may exist if, for example: a holder or technical contact of the domain name wishes to review the current entry a domain name infringes trademark rights the content of a website infringes copyright or personality rights an authority requires the data to fulfil statutory responsibilities. The desire to purchase a domain name or to contact the operator of a website is not sufficient. (from: https://www.nic.ch/whois/domaininfo/)	ICANN org did not expand upon non-EU country policies.		ICANN org did not expand upon non-EU country policies.		
United Kingdom	UK	No	No	The .UK WHOIS does not show a registrant's details unless they have given consent to publication. We provide registration data to third parties with legitimate reasons, such as enforcement of legal rights or use of our Dispute Resolution Service.	The .UK WHOIS does not show a registrant's details unless they have given consent to publication. We provide registration data to third parties with legitimate reasons, such as enforcement of legal rights or use of our Dispute Resolution Service.	Data release process The .UK WHOIS does not show a registrant's details unless they have given consent to publication. We provide registration data to third parties with legitimate reasons, such as enforcement of legal rights or use of our Dispute Resolution Service. To obtain non-public data you must submit a Data Release Request and provide us with your details (which will be disclosed to the data subject) and the reasons why you believe you have the right to access non-public data. Please send this to data-release@nominet.uk. On receiving your request, we aim to reply within one working day. We will respond once we have processed the request. Examples of legitimate requests are (non-exhaustive): A trade mark holder wants to identify the registrant of a domain name so they can be included in a Dispute Resolution Service complaint Solicitors acting for a party that is trying to enforce their Intellectual Property rights A law enforcement agency requesting the data on a domain name (from: https://www.nominet.uk/whois/)	ICANN org did not expand upon non-EU country policies.		ICANN org did not expand upon non-EU country policies.		