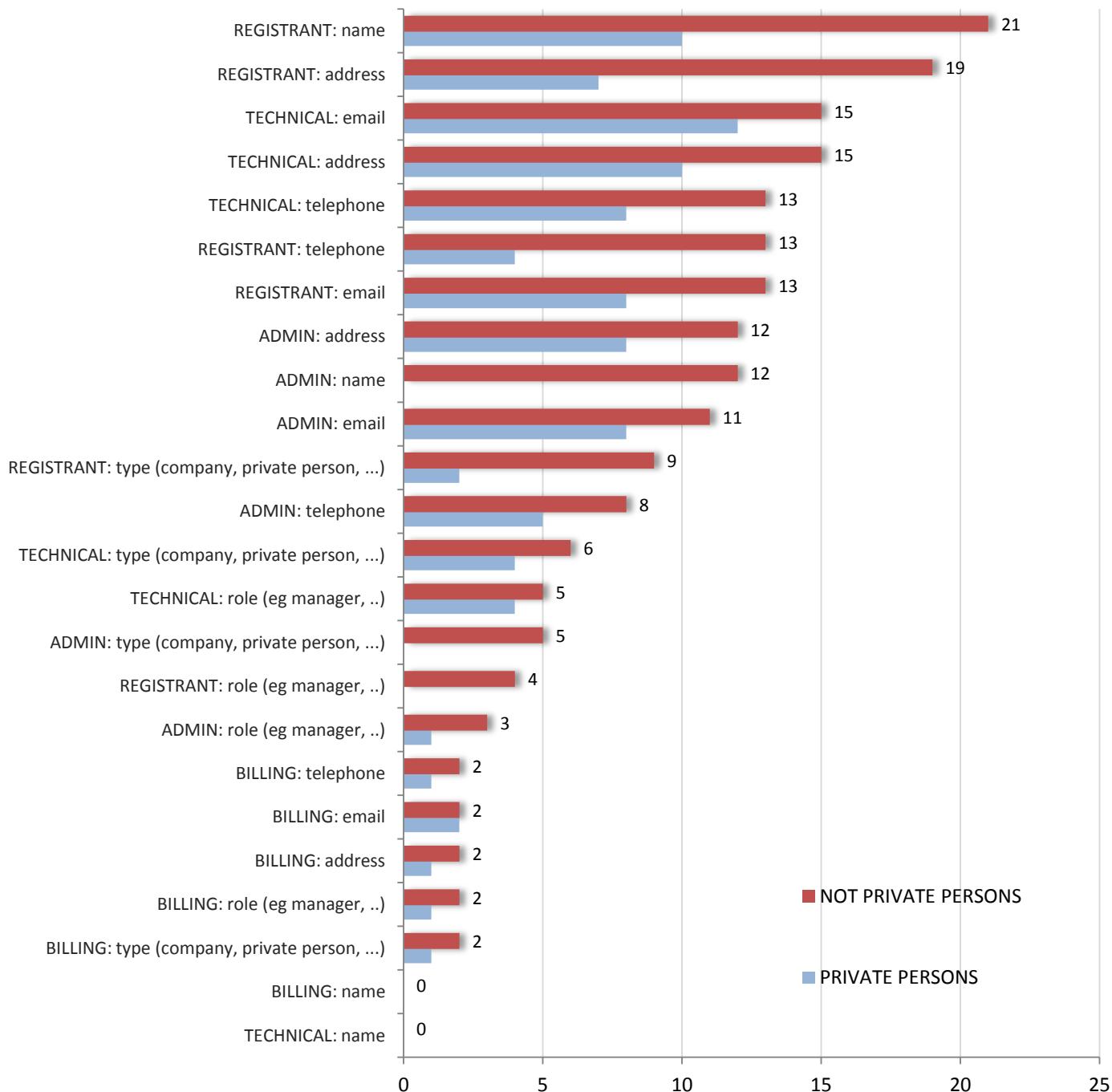




CENTR Data from Member Survey: WHOIS and Data Protection (January 2011)

DATA that cannot be hidden in the WHOIS in relation to private and non-private persons



Comments in relation to how holders can request to hide information in the Whois as well as some comments on proxy registrations

Non-individual Registrants (e.g. corporations, partnerships, etc.) may only get WHOIS Privacy in exceptional circumstances. In order to qualify for WHOIS privacy protection as a non-individual Registrant, they must meet both of the following criteria: 1. The nature of their operations (or activities) makes them have a greater need to protect your personal information than other non-individual Registrants; and 2. Making their personal information available on the WHOIS would likely cause harm to individuals or to the Registrant. For Question 4, certain Registrars offer privacy services, whereby their contact information will be listed in the WHOIS, although the name of the Registrant (for non-individual Registrants) will be listed in the Registrant field.

The contact (with unique id handle) can have the role of the domain holder, admin-c, tech-c etc and only this contact decides, if will hide some data or not. Generally, only "name" (filling the column "organisation" is not obligatory) and "address" must be filled. The contact may tick the data as hidden during the registration process or after through the registrar - it depends on the system of each registrar.

Not possible to hide information in the WHOIS. In very limited circumstances alternative information may be permitted. This requires the registrant to work with the registrar and the Domain Name Commission to work through the particular situation.

Contact data for a name: registrant and technical By default, no data is visible for a private person, all data are visible for a company/organisation. The whois provides facility to send an email to a private person, without showing his email address.

We do not have administrative contact or billing contact. For private registrants only email address and First name letters are shown. For legal person registrant all registrant data is shown. We treat that technical contact cannot be private, as he is doing public service in administering domain name, so all contact data is always shown.

(1) The holder cannot request to hide any information. Billing information is not presented in WHOIS as a Registry policy, not by anyone's request. (2) If there is a proxy arrangement, it is external to the registry, i.e., the holder is the entity registered as such in the registry.

3. Private individuals can choose to hide their address provided the website is not being used for commercial purposes. This can be done at any time through online systems. Note that our WHOIS only displays name, type and address at most for any registrant. 4. We do not prohibit the use of proxy services, and they are offered to registrants from time to time, but most proxy services find it too problematic and do not last - for example, because of being named as the respondent in DRS complaints.

How the holder can request to hide: It depends, if the domain name is registered through the website, then e-mail, telephone and fax is automatically hidden and it must be ticked a check box to unhide the data. If the domain name is registered per EPP-command, then it is the other way round. But this has only technical reasons.

Please note that the Registry shows different information in the public web whois, public command line whois, the registrar whois, the whois for Certification Authorities and the whois for investigative agencies.

Registrant is identified by the fields "name" and "organisation". If only "name" field is filled in, we consider the registration to be private and do not publish personale data other than e-mail address. If "organisation" field is also filled in, we consider this to be a corporate registration and publish full whois details.

By default all registrant data must be made public, unless the registrant can verify that he/she is "hidden" in the National public personal register

Holder can hide all data by paying additional fee.

There's no option to hide selected data, the WHOIS rules say: 3.1. If the Domain name holder is an organisation, the following data shall be published via the WHOIS search service: 3.1.1. official name and head office of the Domain name holder, and telephone/fax number; 3.1.2. valid electronic mail address for the Domain name holder (contact electronic address); 3.1.3. valid electronic mail address for the technical contact person; 3.1.4. data on the Registrar; 3.1.5. data on the DNS server; 3.1.6. date of registration of the Domain name and status of the Domain name; 3.1.7. date of expiry of the Period. 3.2. If the Domain name holder is a natural person, the following data shall be published via the WHOIS search service: 3.2.1. valid electronic mail address of the Domain name holder (contact electronic address); 3.2.2. valid electronic mail address of the technical contact person; 3.2.3. data on the Registrar; 3.2.4. data on the DNS server; 3.2.5. date of registration of the Domain name and status of the Domain name; 3.2.6. date of expiry of the Period. 4.

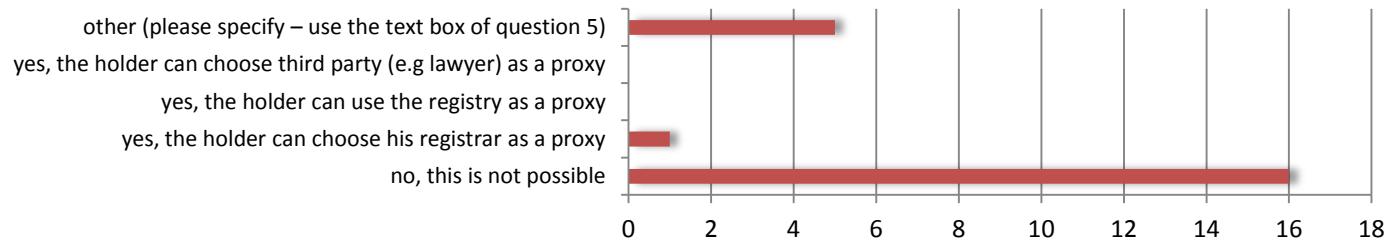
For optional data we provide a disclose mechanism via our registry/registrar interface

A private person data is hidden as a standard option. Such a person may request opt-in to make his data visible. As an admin we understand above a registrar.

In our Country it is defined by law what data MUST be published by the registry (which operates the central WHOIS service for .ch). The Registry publishes exactly this data set. We would break this law if we publish less, and we would break the data protection law if we publish more than the defined fields.

The Registry does not explicitly allow nor disallow the use of proxies. All registrants need to agree to have read and agree to abide by the Terms and Conditions, and all other applicable documents. Please note that the billing-c and tech-c are registrar-specific contacts at the Registry. The registrant only provides us with the registrant-info, and potentially an onsite-contact (tech-c provided by the registrant).

Can the holder use a proxy to hide his personal data?



Raw number from the survey

1. PRIVATE PERSONS - What data CAN NOT be hidden in the Whois?

Registries	REGISTRANT					ADMINISTRATIVE CONTACT					TECHNICAL CONTACT					BILLING CONTACT								
	name	type	role	address	email	tel.	name	type	role	address	email	tel.	name	type	role	address	email	tel.	name	type	role	address	email	tel.
total 21	10	2	0	7	8	4	0	0	1	8	8	5	0	4	4	10	12	8	0	1	1	1	2	1

2. NOT PRIVATE PERSONS - What data CAN NOT be hidden in the Whois?

Registries	REGISTRANT					ADMINISTRATIVE CONTACT					TECHNICAL CONTACT					BILLING CONTACT								
	name	type	role	address	email	tel.	name	type	role	address	email	tel.	name	type	role	address	email	tel.	name	type	role	address	email	tel.
total 22	21	9	4	19	13	13	12	5	3	12	11	8	0	6	5	15	15	13	0	2	2	2	2	2

3. How can a holder request to hide information in the Whois?

Registries	By default all data is visible, holder can select data to hide (e.g. by ticking/ un-ticking the check box)	By default a maximum of data is hidden, holder can select data to hide (e.g. by ticking/ un-ticking the check box)	Holder needs to contact the registry to request to hide data (e.g. by email)	Other (please specify – use the text box of question 5)
	3 (12.00%)	2 (8.00%)	3 (12.00%)	17 (68.00%)
total 25				

4. Can the holder use a proxy to hide his personal data?

Registries	no, this is not possible	yes, the holder can choose his registrar as a proxy	yes, the holder can use the registry as a proxy	yes, the holder can choose third party (e.g lawyer) as a proxy	other (please specify – use the text box of question 5)
	16 (72.73%)	1 (4.17%)	0 (0.00%)	0 (0.00%)	5 (22.73%)
total 22					