

# Organization Field

When the gTLD Registration Data Policy is published it will set requirements for how Contracted Parties process and publish registration data. The Registrar Stakeholder Group's Communications and Outreach Team has reviewed the Policy and created this document to help explain the requirements for registrars regarding redacting personal information from the RDDS output. In cases where there are different requirements for registries, those are not considered or documented here.

## DATA COLLECTION

### What it says

6.5. Registrar **MUST** provide the opportunity for the Registered Name Holder to provide values for the following data elements. If provided by the Registered Name Holder, Registrar **MUST** collect the following data element values:

6.5.1. Registrant Organization

### What it means

The Registrant Organization field does not **require** input, but Registrars must allow Registrants the **option** of providing Organization information

If the registrant chooses to provide Organization information, the registrar **must** collect it

## DISCLOSURE AT TIME OF COLLECTION

### What it says

6.6. If the Registered Name Holder enters a value for the Registrant Organization data element, Registrar **MUST** inform the Registered Name Holder that:

6.6.1. The Registrant Organization will be published in RDDS if the Registered Name Holder agrees to the publication of the value; and (See Implementation Note D.)

6.6.2. The Registrant Organization will be considered the Registered Name Holder.

### Implementation Note D. Publication of Registrant Organization

1. Registrar is free to develop its own process for presenting the Registrant Organization disclosure required by Section 6.6 (e.g., opt-in, pop-up advisory or question). The Registrant Name will be considered the point of contact at the Registrant Organization.

2. Registrar may use its own process to inform the Registered Name Holder of the requirements in Sections 6.6.1 and 6.6.2, for example, by presenting a disclosure, disclaimer, or request for confirmation of the value of the Registrant Organization and agreement to its publication, by way of a pop-up window advisory, opt-in requirement, graying out the Registrant Organization until the Registrant explicitly agrees to the field's publication (by checking a box), etc. These examples do not provide an exhaustive list.

### What it means

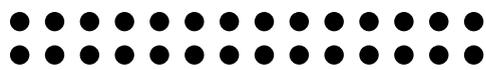
If the registrant chooses to provide Registrant Organization information, the registrar must inform them that the Registrant Organization will be considered to own the domain.

- ★ The person listed in the registrant name field is considered the point of contact at that Organization

There are specific disclosures relating to publication of that Registrant Organization info which must be completed at the time when that data is collected; more information is in the 'publication' section of this doc.

Suggestions for how to do that notification are provided in Implementation Note D.

**This document is not legal advice**  
Local requirements relating to data protection may vary, as may your understanding of ICANN obligations, and (as always) legal requirements take precedence over policy obligations. In general, personal data must be redacted where required by applicable law. If not legally required, redaction may occur where the registrar has a commercially reasonable purpose to do so, or in situations where it is not technically feasible to determine which data should be redacted.



# RDDS Organization Field

## PUBLICATION & REDACTION OF THE ORGANIZATION INFO

### What it says

**9.1.3.** In responses to RDDS queries and subject to the requirements outlined in the subsequent sections, (a) Registrar **MUST** Publish the following data elements if collected or generated, and (b) Registry **MUST** Publish the following data elements if transferred from Registrar or generated by Registry Operator:

#### **9.1.3.3.** Registrant Organization

**9.2.6.** If the Registered Name Holder agrees to the Publication of the value of the Registrant Organization data element, Registrar **MUST** Publish the value. If the Registered Name Holder does not agree to its Publication, Registrar **MAY** Redact the Registrant Organization data element.

*See also again Implementation Note D. Publication of Registrant Organization*

### What it means

At the time of collection, the registrar must inform the registrant about their options relating to publication of the Registrant Organization information. The registrar can determine the best way to do so (e.g. a pop-up, opt-in checkbox, FAQ link URL, etc)

If the registrant agrees to it being published, the registrar must publish the Registrant Organization information.

If the registrant does **not** agree to it being published, the registrar may redact the Registrant Organization information.

- ★ For domains that were registered before the new policy came into effect, see also the Addendum II info - in some cases, the Organization data may be deleted

## DATA TRANSFER TO REGISTRY AND TO ESCROW

### What it says

**7.4.** Registrar **MUST** transfer the following data elements to Registry Operator, if collected, provided an appropriate legal basis exists and data processing agreement is in place:

#### **7.4.1.** Registrant Organization

**8.2.** If Registrar collects or generates the following data elements, Registrar **MUST** submit an electronic copy, in a format specified by ICANN, to an ICANN-approved data escrow agent:

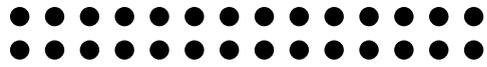
#### **8.2.1.** Registrant Organization

### What it means

If the registrar collects Registrant Organization information, and the Registry requires that the Registrant Organization data element be transferred to them, and an appropriate legal basis exists and data processing agreement is in place, then the Registrant Organization information must be transferred from registrar to registry

If the registrar collects Registrant Organization information, it must be included in the registration data escrow





# RDDS Organization Field

## FOR EXISTING DOMAINS BEFORE THIS POLICY GOES INTO EFFECT

### What it says

#### Addendum II

For existing domain name registrations with creation dates prior to the effective date of this Policy:

1. Registrar MUST contact Registered Name Holders that have entered a value for the Registrant Organization data element and (a) request review and confirmation from the Registered Name Holder that the value is correct; and (b) confirm whether the Registered Name Holder agrees to publication of the Registrant Organization value.
2. If the Registered Name Holder confirms or corrects the value of the Registrant Organization, and agrees to its Publication, Registrar MUST (a) notify the Registered Name Holder that the Registrant Organization value will be treated as non-Personal Data and be Published by the effective date of this Policy and (b) Publish the Registrant Organization value as described in Section 9.1.3 by the effective date of this Policy.
3. If the Registered Name Holder declines publication of the Registrant Organization value, or does not respond to the query, the Registrar, as described in Section 9.2.6, MAY Redact (as defined in Section 9.2.2) the Registrant Organization data element, or MAY delete the Registrant Organization value that was collected prior to the effective date of this Policy. Prior to deleting Registrant Organization value, Registrar MUST ensure that the value for the required Registered Name Holder data element in Section 6.1.9 has been collected.

### What it means

If the domain includes Registrant Organization information, the registrar must ask the domain owner to review that the data is correct and confirm if the registrant consents to publishing the Registrant Organization information

If the registrant consents to the publication, the registrar must explain that the Registrant Organization information will be treated as non-personal data and will be published, and then actually do that publication.

If the registrant does not answer or declines, the registrar may either redact the Organization data from the public RDDS, or delete that Registrant Organization information entirely.

If the registrar deletes that Registrant Organization information, they must first make sure that the registrant's name has been collected (we can't have domains without owners!)

The "Registrant Organization" is sometimes collected within domain name contact records. This entirely optional field has historically experienced mixed and sometimes surprising usage by registrants over the decades of its existence. The new Policy creates guidelines for collection and transfer of Registrant Organization data on a "go-forward" basis, sets standards for how the Registrant Organization field is considered in relation to the domain's Registrant data, and determines obligations relating to publication of the Organization field data.

