Registrar Stakeholder Group

### Redaction

The gTLD Registration Data Policy sets 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.

### A few notes about the specific requirements in this document

- These requirements layer upon each other:
  - The default is to **publish** (unless identified as optional under the "notes" column)
  - This publication can be overridden by an additional requirement to redact, and,
  - This redaction can be overridden
     if the registrant provides consent
     to publish
- Publication is only required if the data is processed; if the data is not collected or generated, then it cannot be published
- Data elements in the chart below are displayed in the order found in the <u>RAA §RDDS (Whois) Specification</u>
- Blank "redact" and "consent to publish" columns indicate that the data element cannot be redacted or is not subject to publication upon consent.

## 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.

| TERM           | DEFINITION  | SOURCE |
|----------------|---|--------|
| I 1919 LIAMANT | Values that are (a) collected from a natural or legal person or (b) generated by Registrar/Registry in connection with a Registered Name  | 3.6    |
| Redact         | Not include the value of the data element in the RDDS output; instead indicate that the value has not been included   | 9.2.2  |
|                | Any freely given, specific, informed, and unambiguous indication of the Data<br>Subject's wishes through a statement or by a clear affirmative action that signifies<br>agreement   | 3.2    |
| Publish        | Provide opportunity for the Registered Name Holder (RNH) to provide their consent of the data element being published in the RDDS output. If RNH does provide their consent, the Registrar MUST publish that data element | 9.2.4  |

#### RAA §RDDS (Whois) Specification:

https://www.icann.org/resources/pages/approved-with-specs-2013-09-17-en#whois





### Explainer

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| Data Element                           | Redact | Consent to Publish | Policy Section Reference              | Notes   |
|--|--------|--------------------|---------------------------------------|---|
| Domain Name                            |        |                    | 9.1.1.1                               |   |
| Registry Domain ID                     | MUST   | MUST               | 9.1.3.1; 9.2.2.1.1; 9.2.4             |   |
| Registrar Whois Server                 |        |                    | 9.1.2.1                               |   |
| Registrar URL                          |        |                    | 9.1.1.2                               |   |
| Updated Date                           |        |                    | 9.1.2.2                               |   |
| Creation Date                          |        |                    | 9.1.1.3                               |   |
| Registry Expiry Date                   |        |                    | 9.1.1.4                               | Optional for Registrar to Publish                                       |
| Registrar Registration Expiration Date |        |                    | 9.1.1.5                               |   |
| Registrar                              |        |                    | 9.1.1.6                               |   |
| Registrar IANA ID                      |        |                    | 9.1.1.7                               |   |
| Registrar Abuse Contact<br>Email       |        |                    | 9.1.1.8                               |   |
| Registrar Abuse Contact<br>Phone       |        |                    | 9.1.1.9                               |   |
| Reseller                               |        |                    | 9.1.7                                 | Optional for Registrar to Publish                                       |
| Domain Status(es)                      |        |                    | 9.1.1.10                              |   |
| Registry Registrant ID                 | MUST   | MUST               | 9.1.3.2; 9.2.2.1.2; 9.2.4             |   |
| Registrant Name                        | MUST   | MUST               | 9.1.6.1; 9.2.2.1.3; 9.2.4             |   |
| Registrant Organization                | MAY    | MUST               | 9.1.3.3; 9.2.2.3; 9.2.6               |   |
| Registrant Street                      | MUST   | MUST               | 9.1.6.2; 9.2.2.1.4; 9.2.4             |   |
| Registrant City                        | MAY    |                    | 9.1.6.3; 9.2.2.4                      |   |
| Registrant State/Province              |        |                    | 9.1.4                                 |   |
| Registrant Postal Code                 | MUST   | MUST               | 9.1.3.4; 9.2.2.1.5; 9.2.4             |   |
| Registrant Country                     |        |                    | 9.1.5                                 |   |
| Registrant Phone                       | MUST   | MUST               | 9.1.6.4; 9.2.2.1.6; 9.2.4             |   |
| Registrant Phone Ext                   | MUST   | MUST               | 9.1.10.1; 9.2.2.1.7; 9.2.4            | Optional for Registrar to publish unless consent to publish is received |
| Registrant Fax                         | MUST   | MUST               | 9.1.10.2; 9.2.2.1.8; 9.2.4            | Optional for Registrar to publish unless consent to publish is received |
| Registrant Fax Ext                     | MUST   | MUST               | 9.1.10.3; 9.2.2.1.9; 9.2.4            | Optional for Registrar to publish unless consent to publish is received |
| Registrant Email                       | MUST   | MUST               | 9.1.6.5; 9.2.2.2.1 and 9.2.3.1; 9.2.4 | If redacted, Registrar must publish a forwarding email/contact URL      |
| Registry Tech ID                       | MUST   |                    | 9.1.3.5; 9.2.2.1.10                   |   |
| Tech Name                              | MUST   |                    | 9.1.3.6; 9.2.2.1.11                   |   |
| Tech Phone                             | MUST   |                    | 9.1.3.7; 9.2.2.1.12                   |   |
| Tech Email                             | MUST   |                    | 9.1.3.8; 9.2.2.2.2 and 9.2.3.2        | If redacted, Registrar must publish a forwarding email/contact URL      |
| Name Server(s)                         |        |                    | 9.1.2.3                               |   |
| Name Server IP Address(es)             |        |                    | 9.1.8                                 | Optional for Registrar to Publish                                       |
| DNSSEC Elements                        |        |                    | 9.1.2.4                               |   |
| Last Update of RDDS                    |        |                    | 9.1.1.11                              |   |