Explainer

Registrar Stakeholder Group

ICANN | RrSG

Redaction & Publication

The <u>gTLD Registration Data Policy</u> 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 and publishing personal information in the RDDS. 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 are interdependent:
 - 1. The default is to **publish** (unless identified as optional in "notes")
 - 2. Publication can be overridden by a requirement to **redact**, and,
 - 3. Redaction can be overridden if the registrant **consents 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) Spec</u>
- Blank "redact" and "consent to publish" columns indicate that the data element cannot be redacted or is not subject to publication upon consent.

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.

This document

| TERM | DEFINITION | <u>RDP</u> Source |
|-----------------------|---|-------------------|
| Data Element | 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 |
| Publish | To provide Registration Data in the publicly accessible RDDS | 3.5 |
| Redact | To not include the value of the data element in the RDDS output; instead indicate that the value has not been included | 9.2.2 |
| Consent | Freely given, specific, informed, and unambiguous indication of the Data Subject's wishes through a statement or by a clear affirmative action that signifies agreement | 3.2 |
| Consent to 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 |
| MUST | The registrar is required follow this requirement to publish the data, redact it, or publish it with the registrant's consent. | |
| MUST IF | The registrar is required to follow this requirement if certain other conditions exist. Here, it means the registrar must publish the data if it is collected or generated. | |
| MAY | The registrar may follow this requirement at their own discretion. They may choose to publish the data or not. | |

| Data Element | Publish | Redact | Consent to Publish | Notes |
|--|---|--|--------------------|---|
| Domain Name | MUST | | | |
| Registry Domain ID | MUST IF | MUST | MUST | |
| Registrar Whois Server | MUST IF | | ······ | |
| Registrar URL | MUST | | | |
| Updated Date | MUST IF | ······································ | | |
| Creation Date | MUST | : | | |
| Registry Expiry Date | MAY | ······································ | | Optional for Registrar to Publish |
| Registrar Registration Expiration Date | MUST | | | |
| Registrar | MUST | | | |
| Registrar IANA ID | MUST | | | |
| Registrar Abuse Contact Email | MUST | | | |
| Registrar Abuse Contact Phone | MUST | | | |
| Reseller | МАҮ | | | Optional for Registrar to Publish |
| Domain Status(es) | MUST | | | |
| Registry Registrant ID | MUST IF | MUST | MUST | |
| Registrant Name | MUST IF | MUST | MUST | |
| Registrant Organization | MUST IF | MAY | . MILIST | Additional details are provided within the published Organization Field Explainer PDF |
| Registrant Street | MUST IF | MUST | MUST | |
| Registrant City | MUST IF | MAY | | |
| Registrant State/Province | MUST IF | | | |
| Registrant Postal Code | MUST IF | MUST | MUST | |
| Registrant Country | MUST | | | [|
| Registrant Phone | MUST IF | MUST | MUST | |
| Registrant Phone Ext | MAY | MUST | MUST | Optional for Registrar to publish unless consent to publish is received |
| Registrant Fax | MAY | MUST | MUST | Optional for Registrar to publish unless consent to publish is received |
| Registrant Fax Ext | MAY | MUST | MUST | Optional for Registrar to publish unless consent to publish is received |
| Registrant Email | MUST IF | MUST | · MUSI | If redacted, Registrar must publish a forwarding email/contact URL |
| Registry Tech ID | MUST IF | MUST | : | |
| Tech Name | MUST IF | MUST | | |
| Tech Phone | MUST IF | MUST | | |
| Tech Email | MUST IF | MUST | | If redacted, Registrar must publish a forwarding email/contact URL |
| Name Server(s) | MUST IF | | | |
| Name Server IP Address(es) | МАҮ | | | Optional for Registrar to Publish |
| DNSSEC Elements | MUST IF | | | |
| Last Update of RDDS | MUST | | | |
| | ••••••••••••••••••••••••••••••••••••••• | ••••• | | |