

From: "Wolf, Egbert"

Date: Friday, January 26, 2018 at 06:02

To: "gdpr@icann.org"

Subject: [Ext] Feedback on proposed compliance models

Dear ICANN,

We have read your proposals for bringing the whois in compliance with the GDPR.

As a registry for .Amsterdam we have looked into the proposals and would like to comment globally on the three models.

[https://www.icann.org/news/blog/data-protection-and-privacy-update-seeking-community-feedback-on-proposed-compliance-models\[icann.org\]](https://www.icann.org/news/blog/data-protection-and-privacy-update-seeking-community-feedback-on-proposed-compliance-models[icann.org])

[https://www.icann.org/en/system/files/files/interim-models-gdpr-compliance-12jan18-en.pdf\[icann.org\]](https://www.icann.org/en/system/files/files/interim-models-gdpr-compliance-12jan18-en.pdf[icann.org])

Model 1, under 6: in this model the name and postal address of natural persons will be personal data and therefore not compliant with the requirements of the GDPR. Model 2, under 6: the email address of the administrative contact will in case of natural persons often be equal to a personal mail address and therefore not compliant with the requirements of the GDPR.

Only the proposed model 3 might be compliant with the GDPR.

We are looking forward to further proposals and discussion.

Kind regards,

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