

On 1/30/18, 01:20:

Ref. request for comments on WHOIS data under GDPR

We use WHOIS as part of our security and fraud operations, to identify domain names which may be similar to our own (co-operativebank.co.uk/smile.co.uk) which may be related to phishing campaigns, identify potential indicators of compromise through linked WHOIS data, and/or to identify potential linked domains to other malicious activity. In the event of malicious activity we use the abuse data within WHOIS to attempt to remove the site and/or provide law enforcement with the intelligence gained. Loss of this service as would occur in Model 3 would impact our effectiveness in security and fraud operations in dealing with activity utilising malicious domains and increase exposure to customers from phishing and/or other fraudulent cyber attacks. A delay to the access of this data due to accreditation services as would occur in Model 2b would leave our customers vulnerable for longer, with the potential to increase cost and or complexity in mitigating cyber threats.

Thanks,
Chris.

Chris Gray
Cyber Security Manager

The Co-operative Bank