

From: Katrin Ohlmer | DOTZON GmbH
Date: Tuesday, February 20, 2018
To: GDPR Questions
Subject: Proposal how to move forward with GDPR

Dear ICAN GDPR Team,

I would like to follow-up on a conversation I recently had with Russ Weinstein during NamesCon. We talked about how to implement the GDPR-related contract changes between ICANN and registries. Due to the different nature of registries (open, communities, high-security,...) the contract amendment will need to take these different requirements into account.

My proposal is, that ICANN could base their approach upon existing processes. A comparable process is in use for the annual certifications: ICANN provides three different templates (Spec 13, Code of Conduct exemption, vertically integrated), so each Registry can choose the annual specification which fits their situation.

With regards to GDPR ICANN could provide a general template and three options for the processing of data between registrars and registries with specific language dedicated to open TLDs, restricted (=community) TLDs and highly-regulated TLDs and ask each registry to use the appropriate one. Thus, it would provide a uniform template for all registries while at the same time meets individual requirements.

Kind regards,
Katrin Ohlmer

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