

From: Gordon Dick

Date: Friday, March 9, 2018 at 10:57

To: "gdpr@icann.org"

Subject: [Ext] Proposed Interim Model for GDPR compliance

Nominet welcome the proposed Interim Model for GDPR compliance, there has been a lot of work within ICANN and across the community to get to this stage. We welcome the continued collection, but pragmatic release of such data in compliance with GDPR.

Registrant Organization

We note that the proposal makes a theoretically pragmatic suggestion that the "Registrant Organization" should be displayed in all circumstances. We have reviewed the data in our live gTLD Registry Services Platform in this light and believe that theory does not meet practice in this area.

In particular, we see in the majority of cases the provision of the same data to the "Organization" as to the "Name" field in our registry systems. **On sampling Nominet's gTLDs, the registrant name and organisation fields are the same in just over 60% of domains.**

On the basis that publishing an individual's name without explicit consent could be considered a breach of GDPR, we cannot envisage a method by which a Registry Operator could publish the Organization field and remain compliant.

Registrant / Admin / Technical / Billing contact details opt in

We note on page 5 you indicate that a Registrar must give the opportunity for a Registrant to opt in to WHOIS. We would like clarification that opt in on Admin, Technical and Billing contacts would also be allowed at the Registry level for consistency.

Thank you for the opportunity to respond to this proposal.

Best regards,
Gordon Dick