

On 1/29/18, 05:51, "Niels ten Oever" wrote:

Dear ICANN,

Thank you very much for the opportunity to respond to the three models for collecting registration data and implementing registration directory services.

The only model that would be in-line with both the GDPR (especially purpose limitation, minimization and limitation of access) as well as international human rights law (especially the right to privacy as enshrined in Article 12 of the Universal Declaration of Human Rights and Article 17 of the International Covenant on Civil and Political Rights) would be Model 3.

Model 3 is already a very common practice among European ccTLDs and provides both protection for registrants, registries and registrars and safeguards due process through the appropriate legal systems.

Rights holders who claim to have a right in relation to copyrights, trademarks, or other issues can also make use of the legal system, in the same way as they would seek to address any potential violation of their rights when they had the private information of the alleged perpetrator.

Alternative channels could also be offered for to relay information to the owner of a domain without divulging their personal data.

Sincerely Yours,

Niels ten Oever

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