

From: Dermot Harnett

Date: Tuesday, January 30, 2018 at 09:25

To: "gdpr@icann.org"

Subject: [Ext] ICANN response: WHOIS data under DGPR

Subject: Response regarding proposed Interim Models for Compliance with ICANN Agreements and Policies in Relation to the European Union's General Data Protection Regulation

Dear ICANN,

We appreciate the opportunity to comment on ICANN's proposed models for whois data compliance with GDPR. We understand that it is certainly not the intent of GDPR to allow malicious domains actors to hide behind protections that GDPR provides.

Symantec utilizes the WHOIS service as a mechanism to identify certain nefarious domain operators who use domains that they register for the distribution of spam, malware and phish emails.

- Symantec uses the information from the whois service combined with other data points to protect our customers from these domain operators who are involved in the distribution of billions of malicious messages every day.
- While some anonymization of domain registration information does occur today, using domain anonymization services comes at a premium that certain nefarious domain operators are often not willing to pay for.
- A loss of data as would occur in Model 3 would be a significant blow and would directly impact the service we can provide to our customers.
- Similarly, an accreditation delay and the data sharing limitations of Model 2 would also impact our work in a negative manner.

Thank you again for allowing those of us in the security industry to provide feedback on your proposals. We hope that an agreement can be reached that will protect our customers and which will also allow whois data compliance with GDPR.

Best Regards

Dermot Harnett Director Development
Symantec Email Security