

10 October 2017

RE: request for information as part of our fact-finding exercise on GDPR

Elena Plexida
Next-Generation Internet – E3
European Commission
CONNECT Directorate General

Contact
Information
Redacted

Dear Elena,

As part of our fact-finding exercise on GDPR, we are looking into the practices that exist across the domain name ecosystem in addressing privacy and data protection law, which could inform how a registrar / registry can be compliant with GDPR. We would be interested to learn about .eu / EURID practices as I understand that they have worked to ensure they have appropriate processes in place. As the .eu has a special status being delegated to the EU, we are interested to learn about their solution.

As the body in charge of supervising EURID including its WHOIS policies under the .eu regulation, would the Commission be able to share information about EURID's data collection, processing and transfer practices, and where they are stipulated (e.g. in contracts with registrars) ?

It would be particularly helpful to have information on the following elements:

How was the current policy developed? Who participated in developing the policy?
Who approved it?

Have any DPAs (or other relevant public body such as law enforcement agencies) expressed an opinion on the .eu WHOIS policy?

How are requests for access to additional details evaluated?

Is there a programme for accrediting/approving trusted organizations or individuals for access to full registration details? What criteria and procedures do they use for evaluating who gets access to additional registration data?

How does EURID determine or verify which registrants are individuals vs organizations?

What have been the advantages and disadvantages of operating under the current WHOIS policy?

Thank you,

Best regards,



Jean-Jacques Sahel

Vice President of Stakeholder Engagement &

Managing Director, Europe