



.CAM Registry

GDPR integration

Version 1.1
2nd May 2018



Scope:

This document describes the measures to be taken by .CAM Registry to stay compliant with the General Data Protection Regulation (GDPR) which becomes enforceable from 25 May 2018. This does not replace in any way the need for the Registry Operator to review their GDPR compliance status and does not constitute legal advice. It merely describes a technical solution for WHOIS.

In order to keep the impact on registrars as small as possible .CAM Registry has decided to make use of the already existing EPP contact extension [RFC 5733](https://tools.ietf.org/html/rfc5733) (Extensible Provisioning Protocol (EPP) Contact Mapping). The contact mapping extension allows the disclosure of individual data elements and attributes. This will enable registrars to allow or restrict disclosure of registration data elements in the WHOIS depending on the needs and/or wishes of their customers.

Registrars will continue to have to supply all registration contact details to the Registry but can make a choice of selecting individual contact details for disclosure or non-disclosure in WHOIS.

Details and examples about the EPP contact extension RFC 5733 can be found here:

<https://tools.ietf.org/html/rfc5733>

Implementation details:

As a default, all contact data will initially be set to non-disclosure. This also applies to contacts that have been set to “disclose” previously. **This means that at the date of launching the new GDPR handling all contacts will be set to nondisclosure and will therefore no longer be shown in the WHOIS. Registrars have to actively update the contacts to disclosure if a WHOIS output is needed and they have demonstrably obtained the necessary consent of the data subject.**

Please be aware of this as that is the opposite handling compared to the standard EPP contact configuration.

Eligible EPP Contact details for disclosure handling:

<contact:name>

<contact:org>

<contact:addr> (includes contact:street, city, pc)

<contact:voice>

<contact:fax>

<contact:email>

Contact state (sp) and Country Code (cc) will always be disclosed to harmonize the system with the proposed ICANN model.



.CAM Registry does not differentiate between legal entities and natural persons nor is there an automated detection of this differentiation. The contact disclosure handling is the same for both entity types and must be configured by the Registrar for every registration.

When requesting a disclosure, Registrar must ensure that the data subject has explicitly agreed to such disclosure. The Registrar should be required to provide evidence to that effect, if necessary. The Registry Operator should update the language of their registry agreements to that effect.

ICANN RADAR exemption for port 43 WHOIS

Registrars with a whitelisted IP at the ICANN RADAR are able to see the real email address of a contact even though the email has been set to non disclose. This only applies to the port 43 WHOIS and allows registrars to stay compliant with the ICANN Form of Authorization (FOA) handling.

We reserve the right to remove access to the real email address immediately and without warning in cases of detected or suspected abuse, in case this access is believed to violate local laws or regulations or in case ICANN proposes an alternative policy.

Reach out to a contact who restrict disclosure of the email address

If the email address of a contact is not disclosed, a link to a web form is shown instead. The Captcha protected web form allows any requester to submit a message that will be relayed to the contact owner. The web form solution will not permit review of any relayed messages by the Registry Operator or us and messages will not be stored longer than necessary.

The web form can be accessed at: <http://gdpr.nic.cam> starting May 22nd 2018. Meanwhile you can check how it looks by visiting <http://gdpr-ote.nic.cam>.

Access for law enforcement agencies entities or similar entitled bodies

All legitimate requests for access to the actual contact information of a domain contact must be submitted by email to the Registry Operators Abuse contact. The Registry Operator should review and evaluate such requests and provide real contact data if required.

KSRegistry will implement a tiered access model at a later stage once the prerequisites for such a model have been agreed by the ICANN community.

Example of WHOIS output with all possible contact details set to restrict disclosure:

Domain Name: NIC.TLD
Registry Domain ID: 3333333333_DOMAIN-TLD
Registrar WHOIS Server: whois.nic.TLD
Registrar URL: http://whois.nic.tld
Updated Date: 2018-01-15T06:48:38Z



Creation Date: 2016-02-17T07:56:25Z
Registry Expiry Date: 2026-02-17T07:56:25Z
Registrar: Registrar Name
Registrar IANA ID: 9999
Domain Status: serverDeleteProhibited <https://icann.org/epp#serverDeleteProhibited>
Domain Status: clientTransferProhibited <https://icann.org/epp#clientTransferProhibited>
Registry Registrant ID: Privacy Protected by Registry
Registrant Name: Privacy Protected by Registry
Registrant Organization: Privacy Protected by Registry
Registrant Street: Privacy Protected by Registry
Registrant Street: Privacy Protected by Registry
Registrant City: Privacy Protected by Registry
Registrant State/Province: Somewhere
Registrant Postal Code: Privacy Protected by Registry
Registrant Country: XX
Registrant Phone: Privacy Protected by Registry
Registrant Fax: Privacy Protected by Registry
Registrant Email: Privacy Protected by Registry (Contact via web form at gdpr.nic.TLD)
Registry Admin ID: Privacy Protected by Registry
Admin Name: Privacy Protected by Registry
Admin Organization: Privacy Protected by Registry
Admin Street: Privacy Protected by Registry
Admin Street: Privacy Protected by Registry
Admin City: Privacy Protected by Registry
Admin State/Province: Somewhere
Admin Postal Code: Privacy Protected by Registry
Admin Country: XX
Admin Phone: Privacy Protected by Registry
Admin Fax: Privacy Protected by Registry
Admin Email: Privacy Protected by Registry
Registry Tech ID: Privacy Protected by Registry
Tech Name: Privacy Protected by Registry
Tech Organization: Privacy Protected by Registry
Tech Street: Privacy Protected by Registry
Tech Street: Privacy Protected by Registry
Tech City: Privacy Protected by Registry
Tech State/Province: Somewhere
Tech Postal Code: Privacy Protected by Registry
Tech Country: XX
Tech Phone: Privacy Protected by Registry
Tech Fax: Privacy Protected by Registry



Tech Email: Privacy Protected by Registry
Registry Billing ID: Privacy Protected by Registry
Billing Name: Privacy Protected by Registry
Billing Organization: Privacy Protected by Registry
Billing Street: Privacy Protected by Registry
Billing Street: Privacy Protected by Registry
Billing City: Privacy Protected by Registry
Billing State/Province: Somewhere
Billing Postal Code: Privacy Protected by Registry
Billing Country: XX
Billing Phone: Privacy Protected by Registry
Billing Fax: Privacy Protected by Registry
Billing Email: Privacy Protected by Registry
Name Server: ns1a.ksregistry.net
Name Server: ns1b.ksregistry.net
Name Server: ns2a.ksregistry.com
Name Server: ns2b.ksregistry.com
DNSSEC: signedDelegation
In case of legitimate interests in obtaining the registered nameholder please contact:
abuse@registry.tld
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>
>>> Last update of WHOIS database: 2018-04-03T11:14:06Z <<<