ALAC-GAC EPDP COOPERATION

NOVEMBER 5 2019

Alan Greenberg Hadia Elminiawi

POSSIBLE TOPICS OF MUTUAL INTEREST

- Complying with the GDPR and other relevant data protection laws
- **SSAD**
- Automation
- ■Accuracy of gTLD registration data
- Distinction between natural & legal persons

COMPLYING WITH THE GDPR AND OTHER RELEVANT DATA PROTECTION LAWS & A SSAD MODEL

- The ALAC acknowledges and stresses on the importance of complying with the GDPR and other relevant data protection laws in relation to the gTLD registration data in order to protect the personal information of the data subjects.
- SSAD Model: The importance of having a standardized system that allows disclosure of non public gTLD registration data to those with legitimate interests and lawful grounds for processing the data.

AUTOMATION

- Allowing for the automation of the system as much as technically possible and legally permissible
- Automation would particularly lead to a quicker and consistent process especially where a large number of requests are being analyzed

ACCURACY OF GTLD REGISTRATION DATA

Article 5(d) of the GDPR says that personal data needs to be accurate and that every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed are erased or rectified.

■Since one of the processing purposes is to provide contact with the domain name holder, data must be sufficiently accurate for that.

DISTINCTION BETWEEN NATURAL & LEGAL PERSONS

- Practical Implementation of the distinction between Natural and Legal persons
- Registration data submitted by legal person registrants may contain the data of natural persons
- Such a distinction will significantly reduce the load on the SSAD and

THANK YOU - QUESTIONS?