

ALAC-GAC EPDP COOPERATION

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POSSIBLE TOPICS OF MUTUAL INTEREST

- Complying with the GDPR and other relevant data protection laws
- SSAD
- Automation
- Urgent SSAD requests
- 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 is as much as possible centralized.
- ❑ The agreed upon Hybrid model is a good start.

AUTOMATION

- ❑ Automation would particularly lead to a quicker and consistent process especially where a large number of requests are being analyzed.
- ❑ The SSAD should start with a number of automated use cases.
- ❑ The contracted party may request the central gateway to fully automate all or certain types of requests.
- ❑ It is expected that the central gateway manager as well as the CPs will learn from the requests and responses and based on this more use cases could be automated in the future.

URGENT SSAD REQUESTS

- Requests for which evidence is provided that shows an immediate need for disclosure should have an immediate response.

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

Concerns include:

- Practical Implementation of the distinction between Natural and Legal persons (including accuracy of the data).
- Registration data submitted by legal person registrants may contain the data of natural persons.
- Registrants may wrongly self-identify themselves.

Such a distinction will significantly reduce unnecessary load from the SSAD

THANK YOU - QUESTIONS?

