



CENTRALNIC LTD

REGISTRY PRIVACY POLICY

Version 1.1

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CentralNic Ltd
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London
EC2R 6AR

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Amendment Issue Sheet

Rev.	Date	Author(s)	Changes
1.0	2012-07-31	GB	Initial version
1.1	2018-08-29	GB/CS/RM	Updated to reflect GDPR, ICANN Temp Spec and RDAP.

Introduction

As a domain name registry operator, CentralNic collects information about our users and customers through a variety of means. This information is stored and used in a number of different ways. This Privacy Policy is intended to outline the information we collect, how it is stored, how it is used and how it is protected. In this policy “we” and “us” refers to CentralNic.

This Policy relates to our domain name registry system only. For privacy information related to our website (www.centralnic.com), please go to:

<https://www.centralnic.com/support/privacy>

CentralNic Ltd is a wholly-owned subsidiary of CentralNic Group PLC, a company registered in England and Wales and Listed on the London Stock Exchange. For more information about the Group and the privacy policies covering other subsidiaries within it, please go to:

<https://www.centralnicgroup.com/>

CentralNic Ltd is registered in the UK Data Protection Register with registration number Z1690303.

Data Protection Rights

CentralNic is subject to the provisions of the General Data Protection Regulation¹ (GDPR), a regulation under EU law with direct applicability on member states which requires EU Member States to protect people's fundamental rights and freedoms, and in particular their right to privacy with respect to the processing of personal data. CentralNic is also subject to the Data Protection Act 2018 which has incorporated the GDPR into UK law to prepare for the UK's planned departure from the EU.

The GDPR gives individuals rights regarding the processing of their personal information including accessing, sharing and storing of their data. Any organisation that does business with EU residents is subject to the GDPR, even if it is based outside of the EU. Article 5 of the GDPR provides for some key principles, which have guided the development of this policy, stating that personal data must be:

- (a) Processed lawfully, fairly and in a transparent manner;
- (b) Collected for specific, explicit and legitimate purposes and not further processed in a manner that is incompatible;
- (c) Adequate, relevant and limited to what is necessary;
- (d) Accurate and where necessary kept up to date;
- (e) Kept in a form that permits identification of personal information for no longer than is necessary for the purpose for which the personal data are processed;
- (f) Processed in a manner that ensures appropriate security of the personal data to maintain integrity and confidentiality of the data;

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Relationship with registrars

Like most other domain name registries, all domain names registered in the CentralNic database are registered via accredited third parties called *registrars*². These registrars are retailers or resellers who register domain names on behalf of their customers, and typically provide additional services (such as web hosting, email, and SSL certificates). Registrars have broad powers to register, delete, and modify the domain names that are registered for their customers, and use a variety of automated and manual tools to do so.

CentralNic has contracts with registrars that require that they ensure that their connection to our registry system is secure, and that all data exchanged between their system and ours is protected. However, CentralNic cannot ensure or guarantee the security of registrars' systems. Registrants should contact their registrar if they have any questions or concerns about how the registrar processes, stores and transmits their personal information. CentralNic also has agreements in place requiring registrars to obtain the consent of individuals when sharing their personal data with us.

What information CentralNic collects

We must collect and process some information in order to operate our registry services or provide support for registrars.

All domain names registered in our database may be associated with the following information, but CentralNic does not mandate that any personal data must be provided, and its registry operator clients may have specific policies or requirements:

- **Registered Name Holder** (or registrant): the legal owner of the domain name.
- **Administrative Contact:** the entity or person authorized by the registrant to interact with the registrar on behalf of the registrant.
- **Technical Contact:** the entity or person authorized by the registrant to maintain the technical operations of the domain name.

² <https://www.centralnic.com/registrars>

- **Sponsoring registrar:** The registrar authorized by the registrant or reseller to register and manage the domain.
- **Name servers:** the domain name servers to which the domain must be delegated in order to function.

The following information may also be provided:

- **Billing Contact:** the entity or person authorized by the registrant that is responsible for payment of registration and renewal fees to the registrar.
- **DNSSEC DS records:** digests of the DNSSEC Secure Entry Point (SEP) for the domain name.

The Registrant and the Administrative, Technical and Billing Contacts described above may include the following information:

- A Unique ID for the contact, assigned by the Registry (sometimes referred to as the “ROID”)
- A Unique ID for the contact, assigned by the Registrar
- Contact Name/Role
- Organisation*
- Street Address
- City
- State/Province*
- Post code*
- Country
- Phone
- Fax*
- Email

** if applicable*

The registrar provides this information to CentralNic when the domain is registered. Registrars can also amend the above information at any time during the lifetime of the domain registration.

At the point of registration, CentralNic also stores the following information:

- The creation date of the domain,

- The expiry date of the domain,
- Status codes used to lock the domain, prohibit updates, etc.,
- A random authorisation code used for transfers.

Information CentralNic does not collect

Because we do not directly interact with registrants, we do not receive or store any of the following information:

- The IP address of the registrar's customer,
- Any credit card information,
- Any passwords used by the registrant to access the registrar's website.

How information is stored

Domain name registration information is stored in a central database. This database is hosted in secure colocation facilities and is protected by enterprise-grade firewalls and an Information Security Management System certified against ISO 27001.

We take regular backups of the database to ensure continuity of service. All backups are stored in an encrypted format and are transmitted to secure off-site locations using encrypted communications channels to prevent unauthorized access.

All the servers which store registration information are located in the European Economic Area (EEA), and so are subject to the GDPR.

How we use information

As a domain name registry, we use this information in the following ways:

1. We use the domain name, name servers, and DNSSEC DS records (if any) to publish DNS zone files to facilitate the functioning of the domains.

This information can be queried through our public DNS servers. Third parties can also access copies of the zone files after signing an agreement, or via ICANN's Centralized Zone Data Service (CZDS)³.

2. The Registrant, Administrative, Technical and Billing Contact information MAY be published via our Whois and Registration Data Access Protocol (RDAP) services.

The Whois system is a standard service operated by all domain name registries and Regional Internet Registries (RIRs) and is used by third parties to obtain information about registered domain names. RDAP is a replacement for Whois which is gradually being phased in, and provides the same information but in a structured, machine-readable data format.

Whois and RDAP data is put to a variety of uses by third parties, including:

- a. Supporting the security and stability of the Internet by providing contact points for network operators and administrators, including ISPs, and certified computer incident response teams;
- b. Determining the registration status of domain names;
- c. Assisting law enforcement authorities in investigations for enforcing national and international laws;
- d. Assisting in combating abusive uses of information communication technology;
- e. Facilitating inquiries and subsequent steps to conduct trademark research and to help counter intellectual property infringement;
- f. Contributing to user confidence in the Internet by helping users identify persons or entities responsible for content and services online; and
- g. Assisting businesses, other organizations and users in combating fraud, complying with relevant laws and safeguarding the interests of the public.

By default, since May 2018, most contact information is NOT disclosed to third parties. However, there are two exceptions:

- a. The Organization, State/Province and Country fields of the Registrant of a domain are always published (if available).
- b. The Contact Name, Street Address (including City, State/Province, Post code and Country), email address, phone and fax numbers will be published (if available) if the entity has explicitly opted in to be displayed in Whois

³ <https://czds.icann.org/>

records. This opt-in is communicated to us by registrars when they create and update contact object records in our database.

3. We MAY use the Registrant, Administrative, Technical and Billing Contact information to contact the appropriate entities when dealing with the following issues:
 - a. Non-payment of registration or renewal fees by the registrar⁴
 - b. Misdirected SSL certificate requests (see <https://www.centralnic.com/support/ssl>)
 - c. Complaints of trademark or copyright infringement, malware, fraud or spam (see <https://www.centralnic.com/support/abuse>)

4. We MAY share the contact information associated with domain names with the Registry Operator (the entity which has the rights to operate the top-level domain of the domains, who outsources the technical operation of the registry to us), subject to a Data Sharing Agreement which enforces compliance with all applicable legislation, including the GDPR.

5. In accordance with the policies of ICANN (the Internet Corporation for Assigned Names and Numbers) the regulator of the domain name industry, we provide copies of registration data to Data Escrow Agents (DEAs) certified by ICANN. These DEAs hold copies of the data so that if we became unable to continue to provide domain registry services (due to a technical or business failure), critical services can be transferred to a successor registry operator with a minimum of disruption to existing domain registrations. Deposits of registration data are encrypted and digitally signed and transmitted securely to the DEAs, who, after validating them, store them securely and will not release the data except under very limited circumstances. More information about the Registry Data Escrow (RDE) program may be found at:

<https://newgtlds.icann.org/en/applicants/data-escrow>

⁴ In most cases, this is not required, however we may send notifications in some circumstances.

An example of a typical Whois record (with contact information opted-out of display) appears below.

```
Domain Name: CENTRALNIC.XYZ
Registry Domain ID: D6866802-CNIC
Registrar WHOIS Server: whois.tldregistrarsolutions.com
Registrar URL: http://www.tldregistrarsolutions.com
Updated Date: 2018-02-02T04:26:32.0Z
Creation Date: 2015-01-28T14:16:13.0Z
Registry Expiry Date: 2019-01-28T23:59:59.0Z
Registrar: TLD Registrar Solutions Ltd
Registrar IANA ID: 1564
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registrant Organization: CentralNic Ltd
Registrant State/Province: London
Registrant Country: GB
Registrant Email: Please query the RDDS service of the Registrar of Record identified in this
output for information on how to contact the Registrant, Admin, or Tech contact of the queried
domain name.
Admin Email: Please query the RDDS service of the Registrar of Record identified in this
output for information on how to contact the Registrant, Admin, or Tech contact of the queried
domain name.
Tech Email: Please query the RDDS service of the Registrar of Record identified in this output
for information on how to contact the Registrant, Admin, or Tech contact of the queried domain
name.
Name Server: NS-CANADA.TOPDNS.COM
Name Server: NS-USA.TOPDNS.COM
Name Server: NS-UK.TOPDNS.COM
DNSSEC: unsigned
Billing Email: Please query the RDDS service of the Registrar of Record identified in this
output for information on how to contact the Registrant, Admin, or Tech contact of the queried
domain name.
Registrar Abuse Contact Email: admin@tldregistrarsolutions.com
Registrar Abuse Contact Phone: +44.2033880600
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/
>>> Last update of WHOIS database: 2018-08-29T09:50:16.0Z <<<
```

An example of a typical Whois record (with contact information opted-in for display) appears below.

```
Domain Name: CENTRALNIC.UK.COM
Registry Domain ID: D57351-CNIC
Registrar WHOIS Server: whois.centralnic.com
Registrar URL: http://www.centralnic.com/
Updated Date: 2018-07-28T00:03:06.0Z
Creation Date: 2000-08-03T12:00:42.0Z
Registry Expiry Date: 2019-08-03T23:59:59.0Z
Registrar: CentralNic Ltd
Registrar IANA ID: 9999
Domain Status: ok https://icann.org/epp#ok
Registrant Name: Domain Administrator
Registrant Organization: CentralNic Ltd
```

Registrant Street: 35-39 Moorgate
Registrant City: London
Registrant State/Province:
Registrant Postal Code: EC2R 6AR
Registrant Country: GB
Registrant Phone: +44.2033880600
Registrant Fax: +44.2033880601
Registrant Email: domains@centralnic.com
Admin Name: Domain Administrator
Admin Organization: CentralNic Ltd
Admin Street: 35-39 Moorgate
Admin City: London
Admin State/Province:
Admin Postal Code: EC2R 6AR
Admin Country: GB
Admin Phone: +44.2033880600
Admin Fax: +44.2033880601
Admin Email: domains@centralnic.com
Tech Name: Domain Administrator
Tech Organization: CentralNic Ltd
Tech Street: 35-39 Moorgate
Tech City: London
Tech State/Province:
Tech Postal Code: EC2R 6AR
Tech Country: GB
Tech Phone: +44.2033880600
Tech Fax: +44.2033880601
Tech Email: domains@centralnic.com
Name Server: NS0.CENTRALNIC-DNS.COM
Name Server: NS1.CENTRALNIC-DNS.COM
Name Server: NS2.CENTRALNIC-DNS.COM
Name Server: NS3.CENTRALNIC-DNS.COM
Name Server: NS4.CENTRALNIC-DNS.COM
Name Server: NS5.CENTRALNIC-DNS.COM
DNSSEC: unsigned
Billing Name: Domain Administrator
Billing Organization: CentralNic Ltd
Billing Street: 35-39 Moorgate
Billing City: London
Billing State/Province:
Billing Postal Code: EC2R 6AR
Billing Country: GB
Billing Phone: +44.2033880600
Billing Fax: +44.2033880601
Billing Email: domains@centralnic.com
Registrar Abuse Contact Email: ops@centralnic.com
Registrar Abuse Contact Phone: +44.2033880600
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>
>>> Last update of WHOIS database: 2018-08-29T09:48:17.0Z <<<

How information is protected

All interfaces used to collect information (specifically, our EPP system, the web-based Registrar Console, our website and account manager used by our retail customers) use Transport Layer Security (TLS, sometimes referred to as SSL) to encrypt information as it is transmitted to our system. This is the same technology used to secure e-commerce systems and online banking. All our systems are secured against unauthorised access to prevent unauthorised third parties from accessing data.

As described above, the database storing domain name registration data is hosted on servers in secure colocation facilities, protected by firewalls and an Information Security Management System that has been certified against ISO 27001. When copied from this server, the database is always transmitted and stored using strong encryption technology.

Our experience of operating a registry since 1995 has demonstrated that the main threat to the information we store comes from abusive use of the Whois service. It is relatively easy for attackers to obtain copies of zone files, or to assemble “dictionaries” of potentially registered domain names. These can then be used to query the Whois system in bulk to obtain contact information.

To mitigate this threat, we operate the following anti-abuse mechanisms:

1. Access to the Whois and RDAP servers are rate-limited, and hosts that send excessive queries to the server are blocked. See https://registrar-console.centralnic.com/pub/whois_guidance for further details);
2. Access to the web-based Whois interface is protected by a “CAPTCHA” to prevent high-volume automated access.

CentralNic signs DNS zone files using DNSSEC. To prevent an attacker from using a “zone enumeration” attack to recover the contents of these zone files (which may then be used as an index to the Whois/RDAP system), we use NSEC3 to provide authenticated denial of existence.

How information is deleted

When a domain name is deleted, unless the registrar has opted out, any contact information associated with the domain will also be deleted if the records are no longer needed for other domains in the database. This also occurs if a domain is updated to use different contact information (such as when a domain changes ownership).

Registrars who have chosen to opt-out of this system are expected to delete their own unused contact information and CentralNic enforces this requirement by providing monthly reports. CentralNic reserves the right to opt registrars back in to automatic purging if they fail to manage their contact information properly.

Any person who believes that their contact information is stored in our registry system in an unused contact object, can request its deletion by sending a request by email (see below).

Individual's rights

Under certain circumstances, if you are a natural living person, you have rights in relation to your personal data, which include the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to access information we hold about you and receive information about how we process it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify your identity as well as the accuracy of the new data you provide to us to protect your security and comply with our data accuracy policies. If you are a registrant, we will have to refer you to your registrar who is in a position to verify and correct any incorrect data.
- **Request erasure** of your personal data. You may request to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we are

required to erase your personal data to comply with applicable laws. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in such limited circumstances as: where you wish to cancel all services and close your accounts; or where you need us to hold the data to establish, exercise or defend legal claims when we would normally delete or anonymise the data.
- **Request the transfer** of your personal data to you or to a third party. We will allow you to copy your information held by us. If you wish to transfer domain names to another registrar, you must do so through the registrar you wish to transfer your domains to.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Automated decision-making** Other than the use of cookies, logs and web beacons, set out above which are automated on the website, we do not use automated profiling or decision making based upon your personal information in providing you with services. We will not contact you solely as a result of visiting our website.

If you wish to exercise any of the rights set out above, please log in to your account or contact us on info@centralnic.com.

Further Information

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to get further information or ask a question

If you have any questions or comments about this policy or you wish to exercise any of your rights detailed above, please contact us in one of the following ways:

By email: info@centralnic.com (please use the Subject "Data Privacy")

By telephone: +44 (0)20 33 88 0600 (24x7)

By post: Data Privacy Officer
35-39 Moorgate
London EC2R 6AR
United Kingdom

Complaints procedure

If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure, please contact us using the points of contact above.

If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 01625 545745 Fax: 01625 524510

Email: enquiries@ico.gsi.gov.uk