

Feasibility of Unique Contacts – Definitions / Terminology

From the Temporary Specification:

Annex: Important Issues for Community Consideration: “Addressing the feasibility of requiring unique contacts to have a uniform anonymized email address across domain name registrations at a given Registrar, while ensuring security/stability and meeting the requirements of Section 2.5.1 of Appendix A.

(...)

Appendix A, Section 2.5.1.: Registrar MUST provide an email address or a web form to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself. “

From the EPDP Phase 1 Final Report:

EPDP Team Recommendation #6

The EPDP Team recommends that, as soon as commercially reasonable, Registrar must provide the opportunity for the Registered Name Holder to provide its Consent to publish redacted contact information, as well as the email address, in the RDS for the sponsoring registrar.

EPDP Team Recommendation #13

- 1) The EPDP Team recommends that the Registrar MUST provide an email address or a web form to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself, unless as per Recommendation #6, the Registered Name Holder has provided consent for the publication of its email address.
- 2) The EPDP Team recommends Registrars MUST maintain Log Files, which shall not contain any Personal Information, and which shall contain confirmation that a relay of the communication between the requestor and the Registered Name Holder has occurred, not including the origin, recipient, or content of the message. Such records will be available to ICANN for compliance purposes, upon request. Nothing in this recommendation should be construed to prevent the registrar from taking reasonable and appropriate action to prevent the abuse of the registrar contact process.

From OneDoc (Phase 1 Implementation)

10.3.3 - Where a Registrar redacts the data element values listed in Section 10.3.1.8 or 10.3.1.12, in lieu of “REDACTED”, Registrar MUST Publish an email address or a link to a web form for the Email value to facilitate email communication with the relevant contact, but MUST NOT identify the contact email address or the contact itself.

If there are further terms that should be defined / described, please add these to the table.

(note, comments that have been addressed through the proposed updates (highlighted in yellow) have been removed from this version. To see the original input, see <https://docs.google.com/document/d/1weQemSQ0-884lLbhmR3OLzUWouyGXMkH/edit>).

Please remember to add your name and affiliation to any input you provide

Terminology	Proposed Definition / Description	Source	Comments / Suggestions
Unique contacts	Registrants [Individualized identifier assigned to a particular registrant (such as an email address)] Individual identifier assigned to a particular legal or natural person associated with the Registrant and/or the registration (e.g. email address or some handle to make contact)	Temporary Specification – Annex: Important Issues for Community Consideration Annex: Important Issues for Community Consideration: “Addressing the feasibility of requiring unique contacts to have a uniform anonymized email address across domain name registrations at a given Registrar, while ensuring security/stability and meeting the requirements of Section 2.5.1 of Appendix A.	Proposed (BB) - “uniform anonymized email” should be “persistent pseudonymized email”

	Contact designated by the Registered Name Holder, that can be both legal and natural persons.		
Uniform [anonymized email] [Uniform pseudonymized email]	The same anonymized email address for a unique registrant across domain name registrations at a given Registrar [The same pseudonymized email address for a unique registrant across domain name registrations at a given Registrar]	Temporary Specification – Annex: Important Issues for Community Consideration	(BB) “A pseudonymized email that is persistent for all domains registered by a unique registrant [sponsored by a given Registrar] OR [across Registrars]. NOTE: the alternative is “A single use pseudonymized email” The question of which approach is required is a policy question, not a legal question.
Pseudonymization	‘Pseudonymization’ means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the	GDPR – Article 4, definitions	

	personal data are not attributed to an identified or identifiable natural person.		
Pseudonymization in the context of unique contacts	The same unique string is used for multiple registrations by a unique data subject.	EPDP Team question to legal counsel	This definition is in conflict with the one used for UNIFORM. (Alan Greenberg, ALAC) BB - I do not see what this definition adds.
Anonymization	Anonymization is a process by which personal data is irreversibly altered in such a way that a data subject can no longer be identified directly or indirectly, either by the data controller alone or in collaboration with any other party.	Pseudonymisation techniques and best practices (ENSIA – November 2019)	BB - best not to use this term to refer to either one-off or persistent contact identifiers.
Anonymization in the context of unique contacts	The string would be unique for each registration by the data subject.	EPDP Team question to legal counsel	BB - again do not see what this definition adds.