

Introduction to the Registration Data Policy

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What is the Registration Data Policy?

The [Registration Data Policy](#) is an [ICANN Consensus Policy](#) that describes **requirements for processing registration data** for ICANN-accredited registrars and registry operators.

The policy was developed via ICANN's bottom-up multistakeholder policy development process and modifies requirements in the Registrar Accreditation Agreement and Registry Agreement in light of new and evolving data protection laws, such as the European Union's General Data Protection Regulation.

Before and After: Registration Data Policy

Before Registration Data Policy

Effective 20 May 2019: [Interim Registration Data Policy for gTLDs](#) (Stage 1) requires contracted parties to continue to implement measures consistent with the Temporary Specification.

The Interim Policy, Registry Agreement (RA), and Registrar Accreditation Agreement (RAA) generally do not detail different processing requirements for data elements.

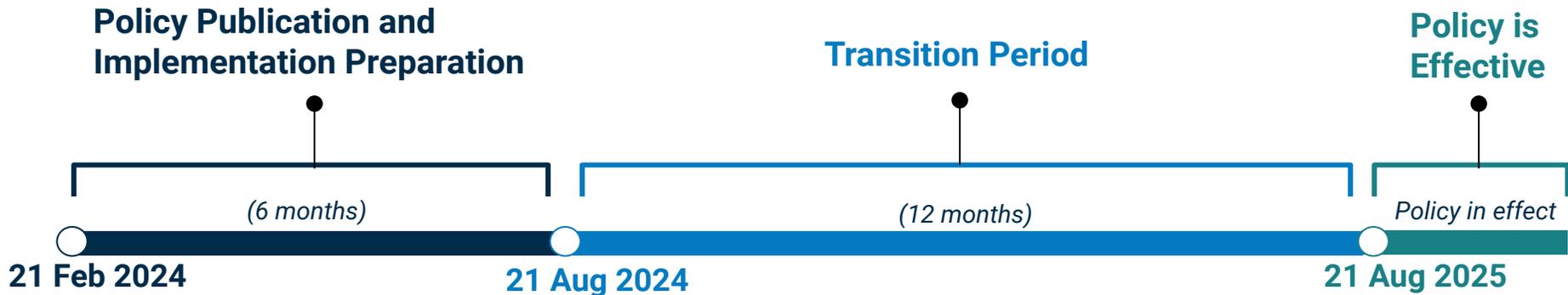
VS

After Registration Data Policy

Registration Data Policy (ii) replaces the Interim Policy for gTLDs and (ii) establishes requirements for specific data elements based on processing activity, including:

- Collection
- Transfer
- Publication
- Redaction
- Retention

Implementation Timeline



- 1. Implementation preparation:** ICANN org publishes the policy. At this time registry operators and registrars continue to implement measures consistent with the Temporary Specification for gTLD Registration Data, and should use this period to *prepare* for implementation of the Policy but not make any changes.
- 2. Implementation Transition Period:** Registrars and registry operators may *begin to make changes and transition* to the Registration Data Policy. At this time registry operators and registrars may continue to implement measures consistent with either the [Temporary Specification for gTLD Registration Data](#), or begin to implement [Registration Data Policy](#), or elements of both.
- 3. Registration Data Policy is Effective.** Registrars and registry operators must *comply in full* with the Registration Data Policy (Interim Policy sunsets, e.g., Stage 3). At this time implementation must be completed.

Policy Outline

- Collection of Registration Data
- Transfer of Registration Data from Registrar to Registry Operator
- Transfer of Registration Data to Data Escrow Providers
- Publication of Domain Name Registration Data
- Disclosure Requests
- Log Files
- Retention of Registration Data

Excerpt of Policy Language

Collection of Registration Data

6.1 Registrar MUST collect or generate (marked with an asterisk) values the following data elements:

- 6.1.1. Domain Name
- 6.1.2. Registrar Whois Server*
- 6.1.3. Registrar URL*
- 6.1.4. Registrar*
- 6.1.5. Registrar IANA ID*
- 6.1.6. Registrar Abuse Contact Email*
- 6.1.7. Registrar Abuse Contact Phone*
- 6.1.8. Domain Status(es)*
- 6.1.9. Registrant Name
- 6.1.10. Registrant Street
- 6.1.11. Registrant City
- 6.1.12. Registrant State/Province

High-Level Changes

Previous Landscape Before Registration Data Policy	New Landscape After Registration Data Policy
Registration Data Contacts	
<p>Specific processing activities generally require the following domain name contacts:</p> <ul style="list-style-type: none">● Registrant contact● Admin contact● Tech contact	<p>Reduces the required set of data elements for processing activities:</p> <ul style="list-style-type: none">● Registrant contact - kept● Admin contact - eliminated● Tech contact - reduced
Transfer of Registration Data	
<p>(Transfer from registrar to registry operator) - Determined by the applicable registry agreement or Consensus Policy, which in most cases requires the transfer of all registration data (e.g., Thick WHOIS).</p>	<p>Certain data elements are required, whereas others are dependent upon the existence of an appropriate legal basis and applicable data processing agreement.</p>

High-Level Changes

Previous Landscape Before Registration Data Policy	New Landscape After Registration Data Policy
Registrant Organization	
<p>Registrar must collect either the first and last name or full legal name of the registrant, and must include in the RDDS either the “Registrant Name” or “Registrant Organization” (or both, if available).</p>	<p>Normalizes treatment of the Registrant Organization field, including in collection and publication, establishing requirements on how to treat the values both for pre-existing registrations and new registrations. Includes required notifications to the registrant (also called the registered name holder or RNH) and how and when the value must be published.</p>
Registration Data Retention	
<p>Registrar must retain certain data identified in the Data Retention Specification for 2 years, including Registration Data.</p>	<p>Shortens the retention requirements for Registration Data elements to at least 15 months after the end of Registrar’s sponsorship of the registration or an inter-registrant transfer.</p>

High-Level Changes

Previous Landscape Before Registration Data Policy	New Landscape After Registration Data Policy
Disclosure of Nonpublic Registration Data	
Registrars and registries must provide reasonable access to nonpublic registration data, subject to balancing the interests of the requestor and the data subject.	Replaces “reasonable access” with requirements for considering and responding to requests by providing either the data or rationale for not providing the requested data.

Highlights of Policy Requirements

Each data element has different requirements and rules that are outlined in the policy, including how specific data elements are:

- Collected or generated
- Transferred
- Escrowed
- Published or redacted
- Disclosed, and
- Retained.

The requirements further outline whether registrars or registry operators:

- **MUST** (e.g., **MUST** collect, or **MUST** escrow etc.)
- **MUST *if*** (e.g., **MUST** collect if offered or **MUST** transfer if collected)
- **MAY** (e.g., **MAY** offer to collect, and if offered, **MUST** collect)
- **MAY *if*** (e.g., **MAY** transfer if supported by Registry Operator)

Overview of Impacted Policies and Procedures

A number of existing policies and procedures are impacted by the Registration Data Policy. As part of the implementation of the Registration Data Policy, ICANN org performed a detailed review of existing policies and procedures and modified those that were impacted.

For a list and the redlines of the policies and procedures that were impacted by the Registration Data Policy, see [Recommendation #27 Wave 1 Policies and Procedure Redline Documents](#). Finalized updates were made on the policy or procedure webpages on ICANN.org.

Many of the changes focused on **updating terminology** and modifying existing requirements to be **technologically agnostic**. A few policies or procedures were impacted beyond terminology changes and a summary of those changes is available below.

Registrars and registry operators may, where applicable, implement the updated policies beginning 21 August 2024 and must implement no later than 21 August 2025.

Impacted Policies and Procedures

The following policies, procedures, and the gTLD RDAP Profile are impacted by Registration Data Policy beyond just terminology changes. Please review the following summary and linked redlines.

Policy	Summary of Changes
Transfer Policy and Transfer Dispute Resolution Policy (TDRP)	Changes to requirements regarding the standard form of authorization (FOA), removal of reference to the admin contact.
Registry Registration Data Directory Services Consistent Labeling and Display Policy (CL&D)	<ul style="list-style-type: none">• Updated to separate the technology-agnostic requirements that apply to any RDDS service from those that only apply to WHOIS Data Directory Services.• Additional updates were made based on the new requirements of the Registration Data Policy
Uniform Domain Name Dispute Resolution Policy (UDRP) Rules	<ul style="list-style-type: none">• Updates to clarify requirements in the initial complaint process: A complaint may be filed against an unidentified Respondent if the Registrant name and contact information is not publicly available in the RDDS or otherwise unknown;• Added language relating to the Registrar requirement to provide the full Registration Data in the verification request upon notification of the complaint.

Impacted Policies and Procedures

Policy	Summary of Changes
URS High Level Technical Requirements for Registries and Registrars	<p>Added requirements:</p> <ul style="list-style-type: none">• Registry Operator shall provide the Provider with the full registration data upon the Provider notifying the Registry Operator of the existence of a complaint;• If the Provider is unable to obtain the full Registration Data from the Registry Operator, the Registrar shall provide the Provider with the full registration data upon notification of the complaint.
Uniform Rapid Suspension System (URS) Rules	<ul style="list-style-type: none">• Updates to clarify requirements in the initial complaint process: A complaint may be filed against an unidentified Respondent if the Registrant name and contact information is not publicly available in the RDDS or otherwise unknown;• Added language to specify that the Provider may also send the Notice of Complaint to the addresses listed in the Registration Data provided by the Registrar or Registry Operator when the Registration Data is redacted in the RDDS.
RDAP Response Profile and RDAP Technical Specification	<p>The RDAP Technical Implementation Guide and RDAP Response Profile documents, known together as the gTLD RDAP Profile, incorporate updates triggered by the Registration Data Policy, editorial updates, and changes related to new Internet standards.</p>

Impacted Policies and Procedures

Policy	Summary of Changes
Additional Registration Data Directory Services (RDDS) Information Policy	<ul style="list-style-type: none">Updated to separate the technology-agnostic requirements that apply to any RDDS service from those that only apply to WHOIS Data Directory Services.

Looking for Further Information?

For additional information please visit the [Registration Data Policy – Implementation Resources webpage](#).