# **PRIVACY POLICY**

**VERSION 1.0** 

### 1. Consent

Registrars that facilitate the registration or renewal of .GDN domains shall provide a copy of this Privacy Policy, or a hyperlink thereto, to all potential or renewing registrants of such domains, and shall obtain registrant's click-through agreement to it.

- 1.1. By applying for a domain name, Registrant affirms that:
  - a. Registrant has read and understood this Privacy Policy;
  - b. Registrant understands that the Registry requests the information described herein for the proper operation of the Registry; and
  - c. Registrant agrees to the collection, use and disclosure of his personal information as described herein.
- 1.2. Registrant may withdraw consent for the further use of his information at any time. However, if the information in question is that which must be collected in order to register a domain name, withdrawing consent will lead to the implied consensual cancellation of the domain name registration.

## 2. Collection of Personal Information

- 2.1. The Registry will limit amount of information collected to be as little as possible, to the extent necessary for The Registry to carry out its Registry operations in the implementation, execution and enforcement of the applicable registry policies, rules and procedures promulgated by ICANN and contained in the Registry Agreement entered into with ICANN upon initial contracting and subsequent renewal or amendment..
- 2.2. Information may be gathered by The Registry when an entity, whether a natural person or legal person, interacts with the Registry or with its partners (e.g. registrars). This includes the collection of registration data such as name, postal address, telephone number and where available fax number, email address, etc. Registration data are collected through the Registry's registrar partners and are submitted into the Registry's domain name database.

# 3. Disclosure of Personal Information

- 3.1. The Registry will not use personal information for marketing purposes and will not disclose the information to other parties except:
  - a. to Government authorities with valid requirements;

- b. to a law enforcement agency, court of competent jurisdiction, or any other governmental entity of competent jurisdiction in response to court order or subpoena, as well as to those legal processes as required if the domain name is subject to a proceeding under the Universal Domain Name Dispute Resolution Policy (UDRP) or Uniform Rapid Suspension (URS) dispute resolution procedure:
- c. to service providers in connection with Registry operation;
- d. to auditors, who are bound by contract and by professional rules to maintain confidentiality and to return all documents.
- e. for the publishing of domain name information via WHOIS.
- 3.2. Part of the information collected from a Registrant will be disclosed via the WHOIS system. Details of the information that will be shown under WHOIS are documented in the WHOIS policy.
- 3.3. All contractor and partners are contractually bound against using the information collected for any other purposes that are not permitted by the Registry.

### 4. Protection

- 4.1. It is important that the information maintained by the Registry on behalf of registrants is accurate, protected from interference by other parties, and treated in confidence by as few personnel as necessary. The Registry will use appropriate secured encryption systems when collecting information over the Internet to prevent eavesdropping. The information will be maintained within state of the art infrastructure (such as firewall, antivirus protection and other security systems) to prevent information leakage and damage from hacking or other intrusions.
- 4.2. The Registry will also perform data backup regularly to prevent potential damage or loss of personal information. The Registry trains staff in regard to data protection and retention, and hires only responsible and capable contractors to manage appropriate systems.
- 4.3. All contractors and partners are contractually bound to protect the information from misuse or theft.