

DATA PROTECTION AND PRIVACY POLICY

Version 1.0

What personal data does the Registry Operator collect?

The Registry Operator will collect all registrant data required by specification 4 of the Registry Agreement with ICANN. This data is provided to us by the registrant's domain Registrar for the purpose of operating the Registry Operator's WHOIS directory

If you are an individual registrant, the collected data will include personal details which you provide to the Registrar which may be considered sensitive and from which you may be personally identifiable ("Personal Data").

As part of our commitment to compliance with data privacy requirements, and to reflect changes in Registry Operator operating procedures, we may need to update the terms of this policy from time-to-time.

How do we process data?

We will only use data provided to us about any registrant, including Personal Data, for the following purposes:

- inclusion in the said searchable WHOIS directory providing free public query-based access to the details as required by clauses 1.5 and 1.6 of specification 4 of the Registry Agreement (please see our WHOIS Policy);
- research on an anonymised amalgamated statistical basis;
- day to day operations of the Registry Operator, including email contact by the Registry Operator with the registrant as required in accordance with our Acceptable Use Policy;
- to our service providers which/who provide legal, accounting, delivery, installation, systems support, escrow, marketing, clearinghouse and directory services on our behalf;
- as may be required by law enforcement agencies or a court order or other compulsory operation of law applicable to the Registry Operator;
- as may be required by ICANN in accordance with a zone file access request in accordance with specification 4 of the Registry Agreement.

For more information please contact abuse@grs.domains

Third party use

We will only share Personal Data with third parties as stated above. Our service providers companies are prohibited from retaining, sharing, storing or using Personal Data for any secondary purposes. However, please note that these third

P: +44 845 5644650

E: legal@grs.domains

W: www.grs.domains

parties may use cookies and action tags to measure advertising effectiveness on an anonymous basis.

We will never sell Personal Data to a third party. However, we cannot control the use made by third parties of WHOIS data which is in the public domain and is searchable globally. We disclaim all liability for any misuse of the data made by a third party of WHOIS data.

We will also provide Personal Data to third parties when obliged by applicable law. We may also provide such information where legal action is proceeding or contemplated or as requested by a legitimate law enforcement agency.

How can you correct or delete Data if you are a registrant?

We only accept registrant data from the relevant Registrar. In the case that you may wish to access, update, correct, rectify or delete Personal Data, please contact the relevant Registrar.

In case that the Registrar has failed to take the appropriate action within the timelines they have specified, you may contact your national data protection or information commissioner or our abuse point of contact: abuse@grs.domains

Please note that deactivation an account with the Registrar does not mean that relevant that Personal Data for that account has been deleted from our database entirely. While as a general rule we will not retain Personal Data records for more than two years after the expiry of the relevant domain name registration, we reserve the right to retain and use Personal Data for longer in order to comply with our legal obligations, resolve disputes or to enforce our agreements.

How do we prevent unauthorised access to Personal Data?

We have implemented the appropriate technical and organizational security measures to protect Personal Data, including internal security procedures that restrict access to and disclosure of Personal Data.

We also use encryption, firewalls and other technology and security procedures to help ensure the accuracy and security of Personal Data and to prevent unauthorized access or improper use.

We will also cooperate with duly authorised law enforcement agencies regarding any allegations of abuse or violation of system or network security as set out in our Acceptable Use Policy.

Regulatory

Any party who feels that its data protection issue has not been dealt with appropriately under the Registrar's procedures can consult the Registry Operator's Acceptable Use Policy and may submit a data protection complaint directly to the Registry Operator at abuse@grs.domains or contact the

Gibraltar Regulatory Authority.

Further data protection issues can be raised with:

The Gibraltar Regulatory Authority

Suite 603, Europort

Gibraltar GX11 1AA

Tel:(+350) 20074636

Fax:(+350) 20072166

Email:

<http://www.gra.gi/index.php?site=dataprotection&topic=contact>

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