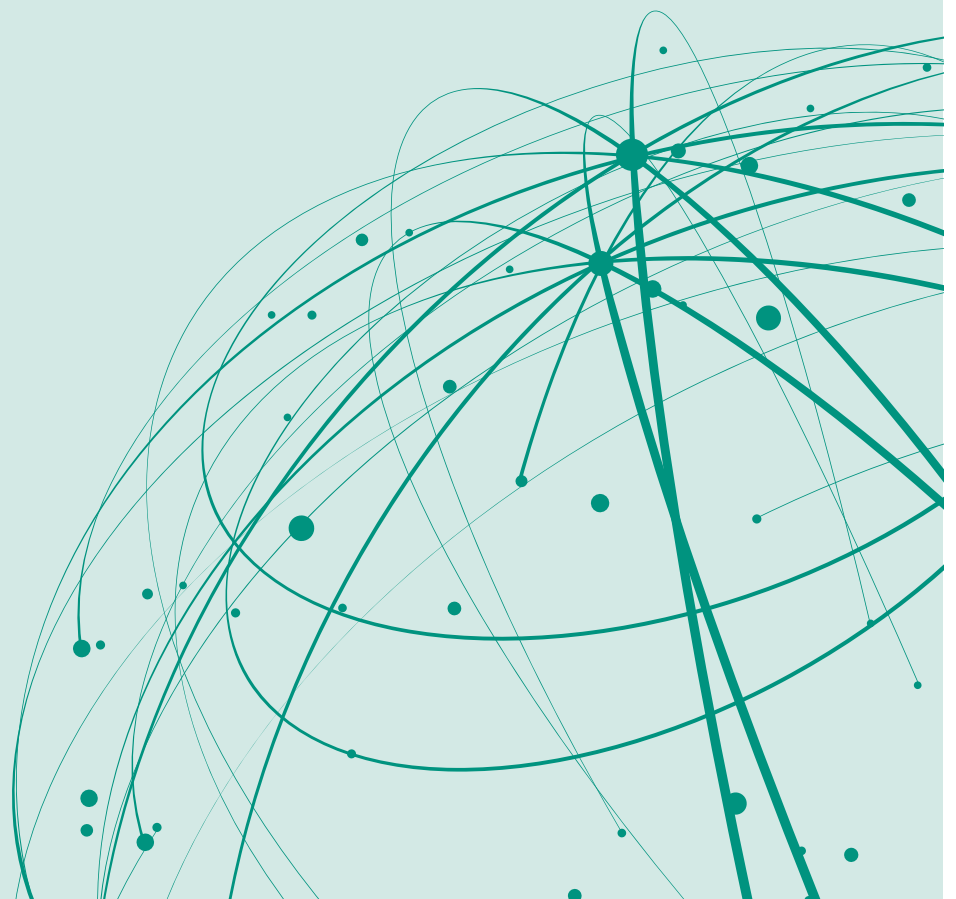




IE Domain Registry

Privacy Policy

This document provides a full copy of our Privacy Policy and all relevant definitions.



Privacy Policy

The following page provides a full copy of our Privacy Policy and all relevant definitions.

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1. Definitions

API means an application programming interface accessible only to Registrars and which may facilitate direct access to the Registry’s Systems;

Applicant means any person or entity who submits or has submitted an application on behalf of a Registrant (or domain holder), being itself or another person or entity, and including but not limited to a Registrar, a reseller or a billing agent (and whether such application has been registered or has yet to be registered);

Console is a web application accessible to all .ie Domain Contacts via the site.

Data Controller – is the individual or the legal person who controls processing activities and is responsible for the keeping and use of personal information on computer or in structured manual files;

Domain Contacts:

Administrative Contact – This is the legal representative of the Registrant who has been authorised to issue instructions or requests in relation to the .ie domain name. This person is the primary point of contact for automated emails relating to the registration of the domain and renewal. The Administrative Contact can also process nameserver changes for the domain, and authorise modifications to the registration (e.g. Registrant reassignment, billing transfers etc.);

Technical Contact – This role can be filled by anyone the Registrant or Billing Contact wishes, and may include the Registrar. The Technical Contact is granted access to the IEDR Console for the purposes of submitting nameserver changes;

Billing Contact – The Billing Contact is the party responsible for payment of registration and renewal fees, as designated by the Registrant;

Domain Holder – is the party who has been granted the right to use the proposed .ie domain name. This party is also known as the Registrant.

DRP is the ie Dispute Resolution Process – being the WIPO dispute resolution rules of procedure for .IE Domain Name Registrations which is accessible on the Site;

Dispute Resolution Process Provider means the panel provided by the World Intellectual Property Organisation Arbitration and Mediation Centre;

IEDR means IE Domain Registry CLG;

Nic Handle means account number and is a unique identifier or user-id assigned by the IEDR to the contacts of each Registrant;

Password is a unique phrase which must be between 8 and 10 characters and be a mix of higher and lower case letters and numbers, including one non-alphanumeric character from the set % @ & # \$ ^ which you chose and use to access the Site and the Services;

Personal Data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Register is the IEDR database of domain names and which also incorporates details about each Registrant and their Contacts (including their Registrar if it has one) and DNS information, in addition to any other information IEDR need;

Registrar means a person, company or organisation who may act on behalf of the Registrant to deal with us and with whom we may have executed an agreement and whose details may be shown in the WHOIS and in the Console;

Registry means the IE Domain Registry CLG;

Resolve means the process of your .ie domain name directing to an online service such as a website, when the domain name is entered as part of a URL into the address bar of a browser.

Rules means all rules and regulations applicable to the .ie Top Level Domain, including without limitation the IEDR Registration and Naming Policy, the Acceptable Use Policy, the WHOIS Policy on the IEDR website, the IEDRP Rules (all as published amongst others on the website of IEDR (www.iedr.ie) and the WIPO <http://arbiter.wipo.int/domains/rules/ie.html>), and the Registrant Terms and Conditions;

Services mean the services of registration, renewal, transfer, secondary market or management of domain names (including changing DNS server details, updating contact information, domain name locking, deletion, modification, suspension, reactivation or the blocking of access thereto) or any other services offered by IEDR through the Site including Whois from time to time;

Site means the websites operated by IEDR and accessible under www.iedr.ie, www.domainregistry.ie, console.iedr.ie and related sites;

System means the hardware and software used by IEDR to provide the Services;

Us or us or we means IEDR;

WHOIS is a look up facility, accessible through the Site. This facility allows a user to review certain information about a .ie registration, which may include the Registrant's name, Billing Contact name, in addition to DNS records, abuse contact information, and registration / renewal date.

You or you means any user of the IEDR site or services, including applicants, registrants, and Registrars.

We or we means IEDR

2. Policy Statement

2.1. About Us

IE Domain Registry CLG (CRO 315315) ("IEDR") is a not-for-profit company limited by guarantee.

- Our registered address is 2 Harbour Square, Crofton Road, Dun Laoghaire, Co. Dublin.
- Our contact email address is privacy@iedr.ie and our telephone number is +35312365400.

IEDR is committed to complying with its obligations under the General Data Protection Regulation ("GDPR") and the Irish Data Protection Act 2018 (together "Data Protection Law"). As part of this commitment, this statement describes IEDR's practices regarding the collection, use, transfer, disclosure and other handling and processing of your Personal Data. You can access further information on our data protection practices in our Rules, and particularly in our Registrant Terms and Conditions.

2.2. Collection

Personal Data is any information relating to you as an individual which allows you to be identified directly or indirectly.

We collect:

- Information that you provide to us;
- Information provided by others about you; and
- Details of your visits to our Site and Services, and the resources that you access.

We may collect Personal Data about you, such as your full name, email address, telephone number and postal address if you register a .ie domain, or act as any of the nominated .ie Domain Contacts.

For Registrants, we also collect evidence of your compliance with our Registration & Naming Policy, in addition to all documentation provided to us during the lifetime of a

domain registration, including identity documentation, which may include your photograph and information about your age and nationality. All such documentation is processed in accordance with this Privacy Policy, and IEDR's Retention Policy, Registration and Naming Policy and Registrant Terms and Conditions, all of which are available on our website: <https://www.iedr.ie/about-the-iedr/our-policies/>

2.3. Communications

We may issue communications to you regarding the .ie domain name for which you are a Domain Contact. These communications include, but are not limited to, notifications regarding renewal, change of DNS records, and other modifications to the domain name registration.

We may from time to time contact you by email to verify the personal information provided by you or actions undertaken by you on the Site.

2.4. Use

IEDR is obliged to keep information (including Personal Data) about you (whether you are a Registrant or a nominated Domain Contact) in order to comply with particular laws, operate and maintain our Site the Services, provide support services on the processes and procedures associated with .ie domain names, and exercise rights and authorities granted to us, including to maintain, update, operate, control and defend the Registry.

We will collect your Personal Data in order to perform the registration required under your contract with us and your Registrar (as applicable).

We will also collect your Personal Data in connection with our legitimate interest in maintaining the integrity of the Site and the Services.

In accordance with our WHOIS Policy, and the Registrant Terms and Conditions, we will also collect your Personal Data where you have given us your voluntary, specific and informed consent to do so. Where we have collected your Personal Data on the basis that you have given us your consent, you may withdraw your consent to that processing at any time.

Personal Data will not be held by us for any longer than is necessary for the purposes for which it was obtained. Personal Data may be retained for the defence of IEDR's interests should legal challenge arise.

2.5. Location of Processing

We process your personal information in the European Economic Area (EEA).

It may also be processed in the USA, by those who work for us or by one of our suppliers. Such staff may be engaged in, amongst other things, the provision of technical and support services.

Your personal information will also be processed in the country in which your nominated Billing Contact (Registrar) operates. This party may process your personal information differently, so you should familiarise yourself with their practices also.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the IEDR Privacy Policy. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

2.6. Disclosure

We do not disclose your personal information to any third parties, other than:-

- with Irish national law enforcement agencies and Regulatory Authorities
- in instances where directed to do so by Court Order
- the nominated Domain Contacts
- the service providers selected to provide dispute resolution services in accordance with the .ie Dispute Resolution Policy, including the World Intellectual Property Organisation (WIPO)
- with those who are contracted to provide technical and support services to the IEDR (subject to strict confidentiality and privacy protection clauses)

2.7. Analytics and Cookies

We use analytics, which collects information about your computer, such as IP address, operating system and browser type. This does not identify any individual user, and is used to help us improve our services for you. We collect this information by placing small text files on your computer, known as cookies. More information about how we use cookies, including information about how to control what cookies are set when you visit our website, is available in the IEDR Cookie Policy at <https://www.iedr.ie/cookie-policy>.

To monitor usage of .ie domains, we collect data on a regular basis, including data on:-

- whether .ie domain names resolve
- where they are hosted
- whether they are used for email and whether a website is in place
- the landing page and About Us or Contact Us pages of .ie websites so that we can categorise the website type
- whether they have an SSL certificate
- whether there is a matching domain name in a different top level domain (e.g. .com) and collect similar information about them in order to see how they differ from the .ie domain name.

We do not collect any more information than would be collected if we visited the pages via a browser. The information we gather is used to help us better understand the .ie market, identify security vulnerabilities and identify changes over time.

If you want to, you can stop the collection of this data about your website(s) by opting out using a robot.txt file, or opting out at <https://www.dataprovider.com/opt-out/>

2.8. Your rights – accessing and updating your personal information

You have the right to:

- access information held about you (request a copy of your Personal Data processed by IEDR)
- to update this information
- to restrict processing of this information/request its erasure.

You must make your request by email to privacy@iedr.ie or in writing by sending it to IEDR at the address specified above, including with the request a photocopy of your passport or other valid photo ID, and a copy of your utility bill which will verify your address, so that we may verify your identity.

2.9. Other Sites and third party applications

Our Site and Services may, from time to time, contain links to other sites. If you follow a link to any of these sites, or other third party apps, please note that these web sites and apps have their own Privacy Statements and that we do not accept any responsibility or liability for your use of such web sites. You are responsible for deciding if you want to

access or use third party apps or sites that link from our services. You agree that IEDR is not responsible for third parties' content or information, or for any damages that arise from your use of, or reliance on, this content or information, or for any use of your personal information by such third parties in ways IEDR would not. Except to the limited extent it may be required by applicable law, IEDR is not responsible for these other sites and apps — use these at your own risk.

By submitting your Personal Data to us, you agree to this collection, storing and processing as outlined above.

3. Privacy Requirements

3.1. Under the terms of this Privacy Policy, you agree:

3.1.1. that if you are the Registrant, or an Applicant acting for the Registrant, that the personal information you provide us with (including Personal Data) relates to the Registrant or a Domain Contact, and not anyone else;

3.1.2. that if you are a Domain Contact, or an Applicant acting for the Registrant, that you have the Registrant's and/or Domain Contacts' permission to supply their personal information to us, to modify it, and to authorise us to collect and process the Personal Data, in order to operate the System and provide the Services, in accordance with the terms of this Privacy Policy, together with our Registrant Terms and Conditions, and WHOIS Policy, and any other documents referred to;

3.1.3. where you are an Applicant, not to register or seek to register domain names without being specifically instructed to do so by Registrants. (Note: a Registrar may register domain names solely for its own use in accordance with the IEDR Registration and Naming Policy without being specifically instructed to do so by Registrants);

3.1.4. if you are the Registrant, or the Applicant acting on behalf of the Registrant, to notify IEDR immediately of any change in the information (including Personal Data) relating to the Registrant; and

3.1.5. if you are the Registrant, or the Applicant acting for the Registrant, you agree to permit the IEDR to process personal information provided to us in accordance with the terms of this Privacy Policy. This includes permission for IEDR:

3.1.5.1. in response to a request from an Admin Contact, to make any changes, transfers or deletion of the domain names as requested by the Admin Contact;

3.1.5.2. in response to a request from a Tech Contact, to process and or to modify as requested, details of the nameservers listed on the Registrant's domain name;

3.1.5.3. in response to a request from a Billing Contact, to accept and process payment of the initial registration fee and the annual renewal fees for the Registrant's domain name, or to reinstate or reactivate an unpaid domain name; and

3.1.5.4. in response to a request from a Billing Contact, to accept Admin Contact and Tech Contact changes.

4. Clarification on Personal Data collection

4.1. You agree that we may use the personal information provided to us:

- 4.1.1. to control, operate, develop, and maintain the Register; to provide the Services and to develop the Services, and to exercise the rights and authorities granted to us by Registrants or their Applicants;
- 4.1.2. to process a request (made by a nominated Domain Contact) to register or renew or transfer or accept a deletion request of a domain name in compliance with the IEDR Registration and Naming Policy and the IEDR Registrant terms and conditions;
- 4.1.3. to acknowledge and deal with requests (including make changes) from a Registrant or Applicant and follow the status tracking thereof;
- 4.1.4. to inform a Registrant or Applicant about procedures to renew the domain name and for recording a transfer, surrender or change of Registrant for the domain name;
- 4.1.5. to transfer a domain name following a decision of the Dispute Resolution Process Provider, the World Intellectual Property Organisation (WIPO), or following a decision of a competent legal or judicial or regulatory authority;
- 4.1.6. to offer secure payment services in respect of the Services and to process payments;
- 4.1.7. to block access to a domain name, or to suspend or reactivate a domain name, or to lock a domain name, or delete a domain name, in accordance with the IEDR Registration and Naming Policy.

5. Retention

We will keep Personal Data only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are processed.

5.1. Successful domain name registration

When you register a .ie domain, we will store the Registrant and Domain Contact personal information, provided to us, as follows:-

- for the lifetime of your domain registration
- plus a further 1-year period after the domain deletion to facilitate the submission and investigation of legal complaints/disputes that may arise
- in addition to a further 1-year period, to provide an appropriate time frame for such legal complaints/disputes to be resolved

The rationale and legal justification for this retention is documented in the IEDR Retention Policy which is available on the IEDR website at <https://www.iedr.ie/about-the-iedr/ourpolicies/>

5.2. Unsuccessful registration request

If you apply for a .ie domain, and your request is unsuccessful:

- Personal information and documentation containing personal information that is provided to us for/by you in support of the registration request, is deleted from our systems on the same day that the registration request expires or is manually cancelled.
- Personal Data provided in the registration request ticket is anonymised 7 days after your application expires or is manually cancelled.

The rationale and legal justification for this retention is documented in the IEDR Retention Policy which is available on the IEDR website at <https://www.iedr.ie/about-the-iedr/ourpolicies/>

6. Security

6.1. To use our Services, including the IEDR Console, each Registrant and Domain Contact must enter a confidential Password. This can be reset, if necessary, using the email address associated with the relevant Domain Contact.

6.2. As the Registrant or Domain Contact, you are responsible for:

6.2.1. all transactions or activities carried out through the Site or Services using your email address and Password and

6.2.2. ensuring that when you access the Services, that the system you use to access the Services is secure, is not left unattended unless you have fully exited the Services and that your email address and Password are not retrievable from the system by others.

6.2.3. notifying us by telephone (+35312365400) or email (privacy@iedr.ie), if you know or suspect that your email address or Password might be known to a third party, or if you suspect that any provisions of this Privacy Policy are not being adhered to by others. If you fail to do so, you will be liable and fully responsible until you notify us. In such event you will be required to change your Password.

6.3. You agree that IEDR will be allowed to assume that any action requested using a Password or NIC Handle for a nominated Domain Contact is authorised by the relevant, nominated Domain Contact.

6.4. IEDR may also specify by notice on the Site from time to time other types of authorised representatives or Contacts from whom IEDR will accept instructions, what types of instructions they can give IEDR, and whether they can take Registrant's place if IEDR need to notify Registrant. You agree to be bound by such notice.

6.5. Whether you are the Registrant, or the Applicant acting for the Registrant, you agree to help us with our security checks, and provide any identification or documentary evidence we reasonably ask for and allow us to keep copies of those documents for our files, in accordance with the Retention Policy.

6.6. You accept that the internet is not secure, so that if you disclose personal information over the internet, save where making payment to us in the secure area of our Services, it can be intercepted by third parties. We cannot ensure or warrant the security of any information that you transmit to us, and you transfer the personal information at your own risk.

6.7. You accept that the IEDR will act on instructions from the relevant, nominated Domain Contact to make the requested changes to the domain registration, subject to the IEDR Registrant terms and conditions and IEDR Registration and Naming Policy.

6.8. IEDR will publish on the Site certain activities which an Applicant or Contact is not allowed to do on a Registrant's behalf or where IEDR want to deal with Registrants only in respect of certain matters. In such case, Applicants agree to observe such restrictions.

6.9. IEDR uses and will keep under review appropriate technical, physical, legal and organisational measures (including staff training and awareness) which comply with Data

Protection Law in order to protect against unauthorised or unlawful processing of your Personal Data, including unauthorised destruction, alteration or disclosure or access.

7. Disclosure of your personal information

7.1. Disclosure to national Law Enforcement Agencies and Regulatory Authorities

We may disclose your personal information to such parties, including but not limited to, An Garda Síochána and Irish national Regulatory Authorities such as ComReg, if we are under a duty to do so in order to comply with any legal obligation, or in accordance with the IEDR Regulatory Authority Protocol, or in order to enforce or apply any contract between us or to protect the rights, property, or safety of IEDR, or others.

7.2. Disclosure to nominated Administrative Contacts (Admin Contact)

Where a Registrant has nominated an Admin Contact to act on their behalf in accordance with the IEDR Registration and Naming Policy, the Registrant authorises IEDR to grant full online access to the Admin Contact via the Site and Services to the Registrant's information, held in electronic format by IEDR, including the Registrant's name, email address, postal address, phone number and their name server details/labels.

7.3. Disclosure to Registrars (Billing Contacts)

The Registrant authorises IEDR to disclose and make available the following personal information to Registrars, including through the Console and/or API, in relation to those Registrants for whom they act, including, but not limited to:

1. a list of the Registrar's portfolio of domain names;
 2. a list of new Registrants (registered by the Registrar) over a selected time period;
- viewing of domains that will be billable in the coming months
1. examination of past invoices;
 2. viewing of the Registrant's Technical Contacts and Administrative Contacts by domain name; and
 3. statistical analysis of the Registrar's portfolio of registered .ie domains.

7.4. Additional Disclosures

The Registrant authorises IEDR:

1. to disclose the Registrant's Personal Data to the service providers selected to provide dispute resolution services in accordance with the .ie Dispute Resolution Policy, including the World Intellectual Property Organisation (WIPO)
2. to disclose the Registrant's Personal Data to third parties, in order for us to comply with any applicable law, regulatory requirement or legal process, or for any of the following purposes; obtaining legal advice in cases of legal challenge, taking legal proceedings, establishing, exercising or defending legal rights (including to enforce the IEDR Registration and Naming Policy and/or the WHOIS Policy, and/or this Privacy Policy) and to act under exigent circumstances to protect the personal safety of customers, users of our services or members of the public.
3. to disclose Personal Data to IEDR's third party technical and support service providers for testing and development purposes.

7.5. The Registrant and nominated Technical Contact agree that their respective IP addresses, where these are available to IEDR, may be supplied to regulatory or legal authorities in connection with fraud or other formal investigations.

7.6. With regard to IEDR's legitimate interest need to ensure the continued operation of its Site and Services, the Registrant or any nominated Domain Contact agree that, if a Registrant or any nominated Domain Contact sends to the Site objectionable content, or otherwise engages in any disruptive behaviour on the Site, including but not limited to, attempted system penetration or direct denial of service attacks, IEDR may use the Domain Contact information that is available to it about that party to request the cessation of such behaviour, in order to protect the integrity and stability of the registry. This may involve informing relevant third parties such as law enforcement agencies about the Registrant's or nominated Domain Contact's behaviour.

7.7. In order to provide the Services, it may be necessary for Registrant information and/or Domain Contact information to be transferred and disclosed to technical software development and database support service providers within the EU and USA who provide backup and other data processing services to us. If we do this, IEDR will ensure that there are adequate safeguards and put an agreement in place with such service providers and will impose in any such agreement, confidentiality and security obligations on the service providers.

7.8. In order to provide the Services, it may be necessary for Registrant information and/or Domain Contact information to be transferred and disclosed to service providers outside the EU, strictly in accordance with the WHOIS Policy.

8. Use of personal information

We use information held about you in the following ways:

8.1. To ensure that content from our site is presented in the most effective manner for you and for your internet connected device.

8.2. Where you are a Direct Registrant (i.e. self-managing your domain registration), to provide you with information, products or services that you request from us or which we feel may interest you, but only where you have strictly consented to be contacted for such purposes. This contact may be by email. Note: Important communications regarding your .ie domain registration, including but not limited to, domain renewal, DNS changes or other domain name modifications, will be issued to you.

8.3. To carry out our obligations arising from any contracts entered into between you and us.

8.4. To allow you to participate in our registration request process.

8.5. We will use, analyse and assess Personal Data to maintain and develop our relationships with Registrants, to process a Registrant's registration, and to provide the Services.

9. Clarification on your rights – accessing and updating your personal information

You have the right to access information held about you.

Your right of access can be exercised in accordance with Data Protection Law.

Personal Data access and correction

9.1. You have the right to be given a copy of your personal information which IEDR holds, or request the correction of this information if it needs to be updated. Whether you are a Registrant or a Domain Contact, you are responsible for ensuring that any Personal Data or other information we hold is up to date. To that end, please ensure that any changes to the information you originally supplied to (your Registrar or to us directly) are promptly notified to your Registrar (or to us) so that we can amend our records.

You must make your request by email to privacy@iedr.ie or in writing by sending it to IEDR at the address specified above, including with the request a photocopy of your passport or other valid photo ID, and a copy of your utility bill which will verify your address.

IEDR will reply within one month of receiving the request. Where necessary for complex and/or high volume requests, the IEDR may reply within one month of receipt of the request advising that an extension of up-to two months is required for the review of the request, confirming the reason for the delay.

9.2. Domain Contacts have the right to request that the processing of your personal information be restricted, or that the personal information be erased. IEDR will assess these requests on a case-by-case basis and accede to the requests where the requirements of Data Protection Law are met.

IEDR will not charge you for dealing with such a request and will respond and comply within one month of receiving such a request. You must make your request by email to privacy@iedr.ie or in writing by sending it to IEDR at the address specified above, including with the request a photocopy of your passport or other valid photo ID and a copy of your utility bill which will verify your address, so that we may verify your address.

9.3. IEDR will not send you marketing communications, where an accredited .ie Registrar is responsible for the management of your domain (Billing Contact). If you are a Direct Registrant (i.e. self-managing your domain), you have the right to ask us not to process your Personal Data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You may exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the address information shown above, or by clicking the "unsubscribe" option in any marketing communications that we send you.

9.4. Whether you are a Registrant or Domain Contact you agree that we may from time to time contact you by email to verify data provided by you or actions undertaken by you on the Site.

9.5. You also have the following rights:

- to lodge a complaint with a data protection supervisory authority;
- a right of data portability; and
- the right to object to automated decision-making.

9.6. You can ask a question or make a complaint about this Privacy Policy and/or the processing of your Personal Data by contacting privacy@iedr.ie.

10. Future changes To Our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. By continuing to use our Site and/or the Services after we post any such changes, you accept and agree to this Privacy Policy as modified.

The .ie namespace uses a 10-step Policy Development Process (PDP) for the submission and review of all proposed policy changes. This is set out on the IEDR website at: <https://www.iedr.ie/p30/policy-development/>