



Openprovider Registration Data Policy

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1. Purpose

This Policy outlines Openprovider's procedures and criteria for collecting, processing, verifying, transferring, publishing, retaining, and disclosing domain name registration data, particularly non-public registration data (NPRD), in accordance with ICANN's Registration Data Policy (RDP), the Registrar Accreditation Agreement (RAA), the Registration Data Reminder Policy (RDRP), the EU NIS2 Directive, and applicable data protection laws, including the General Data Protection Regulation (GDPR). It is intended to ensure that registration data is handled lawfully, fairly, accurately, securely, and transparently while safeguarding registrant privacy.

2. Scope

This Policy applies to all gTLD domain name registrations processed by Openprovider, including registrations initiated or managed by resellers. For country-code top-level domains (ccTLDs), this Policy applies to the extent it is not superseded by applicable registry policies or national laws and regulations.

3. Data Collection, Processing, and Verification

3.1 Purpose and Legal Basis

Openprovider collects and processes registration data to perform domain registration services, comply with ICANN contractual and consensus policy requirements, maintain accurate domain registration records, meet registry requirements, prevent abuse, and comply with applicable law. Depending on the processing activity, the applicable legal basis may include:

- Performance of a contract, including the domain registration agreement;
- Compliance with legal or regulatory obligations; and
- Legitimate interests pursued by Openprovider, registry operators, ICANN, law enforcement authorities, or other third parties, where applicable and subject to applicable data protection law.

3.2 ICANN Registration Data Elements

For gTLD registrations, Openprovider collects or generates the registration data elements required under Section 6 of ICANN's Registration Data Policy, as applicable. The applicable data elements include the following.

3.2.1 Mandatory Data Elements under Section 6.1

Openprovider collects from the Registered Name Holder, or generates as registrar data, the following mandatory data elements, subject to the applicability rules in the Registration Data Policy:

- Domain Name;
- Registrar Whois Server, where required;
- Registrar URL;
- Registrar name;
- Registrar IANA ID;
- Registrar Abuse Contact Email;

- Registrar Abuse Contact Phone;
- Domain Status(es);
- Registrant Name;
- Registrant Street;
- Registrant City;
- Registrant State/Province, where applicable for the relevant country or territory;
- Registrant Postal Code, where applicable for the relevant country or territory;
- Registrant Country;
- Registrant Phone;
- Registrant Email; and
- Registrar Registration Expiration Date.

State/Province and Postal Code are collected where applicable for the relevant country or territory in accordance with the addressing standards recognized by the Registration Data Policy.

3.2.2 Optional Data Elements under Section 6.2

Openprovider may provide the Registered Name Holder with the opportunity to provide additional registration data elements permitted under Section 6.2 of the Registration Data Policy. Where Openprovider offers collection of such a data element and the Registered Name Holder elects to provide it, Openprovider collects and maintains the applicable value. These data elements may include:

- Registrant Phone Extension;
- Registrant Fax;
- Registrant Fax Extension;
- Technical Contact Name;
- Technical Contact Phone; and
- Technical Contact Email.

3.2.3 Data Elements under Section 6.5

Openprovider provides the Registered Name Holder with the opportunity to provide the data elements identified in Section 6.5 of the Registration Data Policy. Where provided by the Registered Name Holder, Openprovider collects the applicable value(s), including:

- Registrant Organization;
- Name Server(s);
- Name Server IP Address(es), where provided; and
- DNSSEC elements, where provided.

3.2.4 Technical Contact Information

Where a Registered Name Holder elects to provide a technical contact, Openprovider informs the Registered Name Holder that, in lieu of providing another individual's personal contact information, the Registered Name Holder may designate itself or its representative as the technical contact, or may provide contact information that does not identify an individual, in accordance with Section 6.3 of the Registration Data Policy.

3.2.5 Registrant Organization

Where a Registered Name Holder provides a value in the Registrant Organization field, Openprovider provides the notices required by Section 6.6 of the Registration Data Policy, including that the organization will be considered the Registered Name Holder and that publication of the organization value in the Registration Data Directory Service (RDDS) is subject to the applicable publication requirements and the Registered Name Holder's agreement where required.

3.3 Registry-Specific and Additional Data

Certain TLDs, including community-based and geographic TLDs, may require additional registration or eligibility data. This may include:

- Government-issued identification or business registration certificates;
- Proof of local presence, residence, citizenship, or operational nexus;
- Declarations of eligibility or intent; and
- Other information required by the applicable registry or law.

Openprovider informs the registrant or reseller of such requirements and collects the additional data only where applicable.

3.4 Registrant Duty of Accuracy and Timeliness

Registered Name Holders are required to provide true, accurate, and current registration data at the time of registration and to keep such data current throughout the registration term. For gTLDs, registration data must be corrected or updated within the period required by applicable ICANN policy or the Registration Agreement. Registry-specific requirements may impose different or additional timelines. Registered Name Holders must also confirm or correct registration data when requested as part of applicable verification, validation, or compliance processes.

Failure to provide or maintain accurate registration data, or failure to respond to applicable verification requirements, may result in suspension, cancellation, deletion, transfer restrictions, or other action permitted under applicable ICANN policies, registry rules, the Registration Agreement, or law.

3.5 Verification of Registration Data

Openprovider implements verification and validation procedures designed to support the accuracy and authenticity of registration data in accordance with applicable ICANN requirements, registry-specific rules, and applicable national and EU law, including the NIS2 Directive where applicable. Measures may include the following:

(a) Geographic and Registry Eligibility Requirements. For TLDs that impose local eligibility, nexus, identity, or other registry-specific requirements, Openprovider facilitates the applicable checks and supporting-document requirements.

(b) ICANN Accreditation Obligations. Openprovider applies the validation and verification measures required by the RAA, the Registration Data Policy, the RDDS Accuracy Program Specification, and other applicable ICANN requirements. This includes email-based verification where required. Where required verification is not completed within the applicable timeframe, the domain name may be suspended, including through clientHold status, until compliance is achieved.

(c) Registry-Imposed Validation. Certain registries impose additional verification requirements, which may include identity documentation, phone validation, business-registration checks, or third-party identity verification.

(d) Local Regulatory Compliance and NIS2 Requirements. Openprovider applies local regulatory requirements where applicable, including identification or KYC measures required by law. In accordance with applicable NIS2 requirements, Openprovider maintains procedures designed to collect and maintain accurate and complete domain name registration data, verify such data where required or appropriate using reliable sources, facilitate timely correction of inaccurate data, and respond to legitimate reports concerning inaccurate or false registration information.

3.6 Registrant Cooperation Obligations

Registered Name Holders must:

- Respond without undue delay to legitimate verification or validation requests;
- Provide genuine and unaltered supporting documentation where required; and

- Demonstrate compliance with applicable eligibility, registry, contractual, or legal requirements.

Non-compliance may result in delays, DNS resolution suspension, domain deletion, or other action permitted under the applicable requirements.

3.7 Confidentiality and Data Minimization

Openprovider processes registration data only to the extent necessary for the applicable registration, compliance, verification, security, disclosure, and legal purposes. Registration data and supporting documentation are:

- Accessible only to authorized personnel and service providers with a legitimate need to access the data;
- Stored using appropriate technical and organizational security measures;
- Retained only for the period required by applicable contractual, regulatory, or legal requirements; and
- Handled in accordance with Openprovider's applicable privacy and data protection policies.

3.8 Registration Data Reminder Policy (RDRP)

Openprovider complies with ICANN's Registration Data Reminder Policy. At least annually, Openprovider presents the Registered Name Holder with the current registration data for the applicable domain name and reminds the Registered Name Holder to review the data and make any necessary corrections. The notice also informs the Registered Name Holder that the provision of false contact information may constitute grounds for cancellation of the domain name registration.

Each RDRP notice includes the registration data elements collected or generated pursuant to Section 6 of the Registration Data Policy and contained in Openprovider's database for the relevant registration. This includes:

- All applicable mandatory data elements under Section 6.1, including Registrant State/Province where applicable;
- Any applicable Section 6.2 data elements where Openprovider offered the Registered Name Holder the opportunity to provide the data, the Registered Name Holder provided the data, and the data is maintained in Openprovider's database; and
- Any applicable Section 6.5 data elements provided by the Registered Name Holder and contained in Openprovider's database, including Registrant Organization, Name Server(s), Name Server IP Address(es), and DNSSEC elements, as applicable.

Openprovider maintains records sufficient to demonstrate that the applicable RDRP notice was transmitted, including the date of transmission and the content or data elements included in the notice, in accordance with applicable ICANN record-retention requirements.

4. Data Transfer and Publication

4.1 Data Transfer

Registration data may be transmitted to registry operators, data escrow providers, processors, service providers, or other recipients where required or permitted by ICANN policy, applicable registry agreements, contractual requirements, or law.

4.2 Data Publication

Openprovider publishes registration data through the applicable Registration Data Directory Service, including RDAP, in accordance with ICANN requirements. Personal data is redacted, anonymized, or otherwise protected where required by applicable ICANN policy or data protection law. Data elements that ICANN policy requires to be published without redaction are published in accordance with those requirements.

5. Data Retention

Openprovider retains registration data for the periods required under applicable ICANN contractual requirements and the Registration Data Policy, subject to any approved waiver or applicable legal requirement. Where a different retention period is required by law, Openprovider applies the legally required period.

6. Registrant Rights and Responsibilities

- **Transparency:** Registrants are provided with information concerning the processing of their registration data in accordance with applicable privacy and data protection requirements.
- **Third-Party Data:** Registrants who submit personal data relating to another individual are responsible for ensuring that they are permitted to provide that data and that any required notices have been given.
- **Data Access and Correction:** Registrants may access and request correction of their registration data through Openprovider's applicable account, support, or data subject rights procedures.
- **Accuracy:** Registrants are responsible for keeping registration data accurate and current and for responding to applicable verification and reminder notices.

7. Reseller Obligations

Resellers involved in gTLD registration services must comply with the obligations applicable to them under the Registration Agreement, this Policy, applicable ICANN requirements, registry rules, and law. In particular, resellers must:

- Submit complete and accurate registration data to Openprovider;
- Ensure that required notices, verification requests, and registrant communications are not obstructed or altered in a manner that would prevent compliance;
- Facilitate timely correction or updating of registration data when required; and
- Remain informed of applicable ICANN, registry, and Openprovider policy updates relevant to the registration services they provide.

8. Data Security

Openprovider implements and regularly reviews appropriate technical and organizational security measures to protect registration data against unauthorized access, alteration, disclosure, misuse, loss, or destruction. Measures include, as appropriate, access controls, encryption, secure storage, logging, monitoring, and incident-response procedures.

9. Policy Review and Updates

This Policy is reviewed periodically and may be revised to reflect changes to ICANN consensus policies, contractual requirements, registry rules, applicable law, regulatory guidance, and Openprovider's operational processes. Updated versions are published on Openprovider's official website.