.cat privacy by default

(even before the GDPR and the Temporary Specification)

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About .cat

➢ Catalan-speaking community
➢ 13M inhabitants area
  10M speakers
➢ Managed by Fundació puntCAT, non-profit NGO
About .cat

- Approved on 2005
- Launched on 2006
- 108K domains
- Staff:
  - 8 full-time + 4 part-time
  - 3 Technical Team (2F + 1P)
.cat backend

- Provided by CORE
- TANGO SRS solution
- Based in Dortmund (Germany)
  Redundancy in Amsterdam (Netherlands)
- 7 secondary servers
  - 1 Barcelona + 1 Madrid
  - 3 Europe
  - 2 Rest of the world
  - 4 Anycast
.cat privacy model

- Free for everybody
- Domain-based
- EPP compatible
- Selection at registrar level
- Self-selection
Privacy model legal framework

➢ Consultations:
  • ApdCAT – Agència de Protecció de Dades de Catalunya
  • AEPD – Agencia Española de Protección de Datos
  • Art. 29 Data Protection Working Party

➢ Recommendations:
  • GAC

➢ Results:
  • Amendment to the Registry Agreement, approved - fall 2012
  • Included directly in the new .cat RAA renewal - fall 2015
Implementation

Registry

- New EPP extension, involving:
  - domain:create
  - domain:update
  - domain:info
  - Adapt RDS / Whois output

Registrar

- Add new options for the registrant during the creation and the updating processes
- Adopt new transfer requirements for undisclosed domains
# Implementation

## EPP Extension for Domain-Based privacy – formal syntax

<table>
<thead>
<tr>
<th>Create Extension + disclosureType</th>
<th>Update Extension</th>
<th>Info Extension</th>
</tr>
</thead>
<tbody>
<tr>
<td><code>&lt;complexType name=&quot;createType&quot;&gt;</code>&lt;sequence&gt;&lt;element name=&quot;disclosure&quot; type=&quot;prv:disclosureType&quot;/&gt;&lt;/sequence&gt;&lt;/complexType&gt;`</td>
<td><code>&lt;complexType name=&quot;updateType&quot;&gt;</code>&lt;sequence&gt;&lt;element name=&quot;chg&quot; type=&quot;prv:chgType&quot;/&gt;&lt;/sequence&gt;&lt;/complexType&gt;`</td>
<td><code>&lt;complexType name=&quot;infDataType&quot;&gt;</code>&lt;sequence&gt;&lt;element name=&quot;disclosure&quot; type=&quot;prv:disclosureType&quot;/&gt;&lt;/sequence&gt;&lt;/complexType&gt;`</td>
</tr>
<tr>
<td><code>&lt;complexType name=&quot;disclosureType&quot;&gt;</code>&lt;sequence&gt;&lt;choice&gt;&lt;element name=&quot;natural&quot; type=&quot;prv:naturalType&quot;/&gt;&lt;/choice&gt;&lt;element name=&quot;legal&quot; type=&quot;prv:legalType&quot;/&gt;&lt;/sequence&gt;&lt;/complexType&gt;`</td>
<td><code>&lt;complexType name=&quot;chgType&quot;&gt;</code>&lt;sequence&gt;&lt;choice&gt;&lt;element name=&quot;disclosure&quot; type=&quot;prv:disclosureType&quot;/&gt;&lt;/choice&gt;&lt;/sequence&gt;&lt;/complexType&gt;`</td>
<td></td>
</tr>
<tr>
<td><code>&lt;complexType name=&quot;naturalType&quot;&gt;</code>&lt;attribute name=&quot;disclose&quot; type=&quot;boolean&quot; use=&quot;required&quot;/&gt;<code>&lt;/complexType&gt;</code></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Implementation

EPP Extension for Domain-Based privacy – real domain:create example

```xml
<?xml version="1.0" encoding="UTF-8"?>
<epp xmlns="urn:ietf:params:xml:ns:epp-1.0">
  <command>
    <create>
      <create xmlns="urn:ietf:params:xml:ns:domain-1.0">
        <name>martifigueras.cat</name>
        <period unit="y">1</period>
        <ns>
          <hostObj>ns1.cdmon.net</hostObj>
          <hostObj>ns2.cdmon.net</hostObj>
          <hostObj>ns3.cdmon.net</hostObj>
        </ns>
      </create>
      [...]
    </create>
  </command>
</epp>
```
Implementation

EPP Extension for Domain-Based privacy – whois output undisclosed domain

```
[querying whois.cat]
[whois.cat]
Domain Name: masolver.cat
Registry Domain ID: 935439-D
Registrar WHOIS Server: whois.dinahosting.com
Registrar URL: https://dinahosting.com
Updated Date: 2018-10-13T18:40:16.417Z
Creation Date: 2014-12-11T18:01:09.949Z
Registry Expiry Date: 2018-12-11T18:01:09.070Z
Registrar: Dinahosting s.l.
Registrar IANA ID: 2262
Registrar Abuse Contact Email: abuse-domains@dinahosting.com
Registrar Abuse Contact Phone: +34 961849200
Reseller:
Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited
Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited
Registry Registrant ID:
Registrant Name:
Registrant Organization:
Registrant Street:
Registrant City:
Registrant State/Province:
Registrant Postal Code:
Registrant Country:
Registrant Phone:
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email:
Registrant Admin ID:
Admin Name:
Admin Organization:
Admin Street:
Admin City:
Admin State/Province:
Admin Postal Code:
Admin Country:
Admin Phone:
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email:
Registry Tech ID:
Tech Name:
Tech Organization:
Tech Street:
Tech City:
Tech State/Province:
Tech Postal Code:
Tech Country:
Tech Phone:

Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email:
Registry Billing ID:
Billing Name:
Billing Organization:
Billing Street:
Billing City:
Billing State/Province:
Billing Postal Code:
Billing Country:
Billing Phone:
Billing Phone Ext:
Billing Fax:
Billing Fax Ext:
Billing Email:
Name Server: ns2.arxiveshred.com
Name Server: ns1.arxiveshred.com
DNSSEC: unsigned
DNSSEC: unsigned
Canonical Name: masolver.cat
EPP TLD: .cat
URL of the ICANN Whois Inaccuracy Complaint Form: https://www.icann.org/wicf/

For more information on Whois status codes, please visit https://icann.org/epp

This domain has chosen privacy settings according to the European data protection framework provisions.

Should you need to contact the registrant, please see
http://www.domini.cat/contact-registrant

For law enforcement and trademark protection purposes, see
http://www.domini.cat/whois-access

In case of technical problems, please see
http://www.domini.cat/report-problem
```
Implementation

EPP Extension for Domain-Based privacy – transfer procedure

Typical procedure – disclosed domains

domain:info  contact:info

Adding authinfo – undisclosed domains

domain:info + authinfo  contact:info
Adoption

Registrars

➢ First version available for testing - Fall 2012
➢ Early adopters – 7 most important .cat registrars
  • Publicly available - January 2013
  • Available > 80% domains – 1’5 years later
➢ Newly accredited registrars – implemented by default *
Adoption

Registrants – current situation

- Natural: 50.143 (46%)
- Legal: 57.708 (54%)

Commercial: 20.021 (40%)
Non-commercial: 30.122 (60%)
Adoption

Registrants – current situation

- Disclosed: 77,729 (72%)
- Undisclosed: 30,122 (28%)
Issues

➢ Registrants don’t know this feature
➢ Registrants have to open a ticket to modify their privacy settings
➢ Many registrars ask registrants to disable the privacy for transfers
  • Newcomers to the .cat market
  • Very large registrars
➢ * Sometimes registrars set default policies
➢ Disabling this feature after deploying a new registrar website version
... and then, it came the 17/05 Temporary Specification ...

... and we continued offering this service to our Registrants!
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Thank you!

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