GDPR and .AS Domain Registry

What is there to be worried about?

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AS Domain Registry
ccNSO Members meeting
Who we are...

- US Territory (Like Puerto Rico!)
- Located at 14d 19’54 S / 170d 42’41”W
- 16,111 km from Paris
- Far, far away from the EU and the GDPR
And we do not look like Europe... 😊
So what is there for us to be worried about?

• A breakdown of where our registrants come from:

<table>
<thead>
<tr>
<th>Origin of Registrations</th>
<th>Percentage of Registrations</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Samoa + United States</td>
<td>6%</td>
</tr>
<tr>
<td>Non-EU/EU Geographic locale states</td>
<td>10%</td>
</tr>
<tr>
<td>EU Members</td>
<td>21%</td>
</tr>
<tr>
<td>EU Members + Geographic locale states</td>
<td>63%</td>
</tr>
</tbody>
</table>
Actually, we have a lot to be worried about…

• Based on the origin of our registrations
  • 63% from within the EU and EU + Geographic locale states

• We have to respect what is required by the EU, and have always tried to do so…
We have always been privacy conscious...

• Our “whois” information has been limited to:
  • Domain Status
  • Registrant
  • Registrar
  • Initial Registration Date
  • Registration Status
  • Name Servers

• But since we publish Registrant information, we appear to have a problem...
So what are we doing with regards to GDRP?

• We keep the Registry data exclusively within the EU
  • And have done so for about 5 years now
  • Exception:
    • Legacy Registrar system, covering about 4,100 domains within the EU/EU+Geographic locale
    • THIS IS A BIG PROBLEM FOR US
  • Moving the legacy Registrar data to a Data Centre within the EU
  • Migrating to a new Legacy Registrar Platform
So what are we doing with regards to GDPR?

• Does this make us GDPR Compliant?
  
    • No! It probably simplifies things however

• Solution:
  
    • No clear solution

    • We are small; we have to bring in outside experts to advise us as to how to proceed to insure compliance