

Approved by the Estonian Internet Foundation Council decision on 17 April 2015 and taking affect of 1 July 2015

Signed on	

Registrar Contract Annex 4

Personal Data Processing Guidelines

- 1. Registrars process personal data relating to domains only for the purposes, in the manner and to the extent described in the Registrar Contract and the Domain Rules.
- 2. The Registrar is obliged to protect the following personal data pursuant to the requirements set forth in the Personal Data Protection Act and in this Registrar Contract:
- 2.1. first name, middle name(s) and surname, personal identification code and/or date of birth, postal address, telephone number and e-mail address of a Registrant who is a natural person;
- 2.2. the name, personal identification code and/or date of birth, address of place of residence, telephone number and e-mail address of an Administrative Contract;
- 2.3. name, personal identification code and/or date of birth, address, telephone number and e-mail address of a Technical Contact who is a natural person.
- 3. The Registrar agrees and undertakes to keep confidential the personal data they have gathered and that has become known to them, and only use the personal data for performance of the duties arising from the Registrar's role.
- 4. The Registrar is responsible for and undertakes to ensure that the manners in which personal data is collected and processed complies with relevant legislation, is regulated with the Registrar's internal documents and in conformity with generally accepted practices.
- 5. The Registrar may forward the personal data in their possession to the following persons:

- 5.1. the Estonian Internet Foundation;
- 5.2. the person to whom the personal data belongs (the data subject).
- 6. The Registrar undertakes to apply measures and technical solutions that in terms of their price and complexity are proportionate to the volume of the personal data to be protected, and guarantee that personal data is protected to the extent required in the Personal Data Protection Act. Based on the above the Registrar guarantees that:
- 6.1. a safe working environment has been created for the Registrar's staff and they have been assigned the obligation to abide by the security procedures established by the Registrar;
- 6.2. the staff are regularly reminded that following the established security procedures is mandatory;
- 6.3. the information technology assets, which are used for personal data collection and processing, are adequately protected against theft, damage or destruction;
- 6.4. the information technology assets that are connected to computer networks are adequately protected from unauthorised access;
- 6.5. measures have been taken to prevent personal data from perishing, damage to their completeness, and third parties from accessing the personal data when they are forwarded via the internet or another network between computers.
- 7. The Registrar confirms to the Estonian Internet Foundation in writing and regularly **once a year** that they observe the personal data protection requirements set forth in the Registrar Contract and the Personal Data Protection Act.

Heiki Sibul Chairman of the Management Board