

Registrar Disclosure Statement - ICANN RAA 3.17

1. Purpose and Scope

This Disclosure Statement includes the information that Atak Domain Bilgi Teknolojileri A.Ş. ("Atak Domain", "we", "us"), as an ICANN-accredited registrar, is required to publicly disclose under Section 3.17 of the ICANN Registrar Accreditation Agreement ("RAA").

The purpose of this document is to provide transparency regarding Atak Domain's:

- data processing practices
- data sharing methods
- proxy/privacy (Whois privacy) services
- Whois/GDPR compliance
- domain registration and transfer policies
- relationship with Registry Operators
- data retention and log management
- compliance with ICANN policies

2. ICANN Accreditation Status

Atak Domain is officially accredited by ICANN as a domain registrar.

As part of this accreditation, Atak Domain must adhere to ICANN's consensus policies and the requirements outlined in the RAA.

Atak Domain's obligations toward ICANN include:

- ensuring accuracy of Whois data
- sending Whois Data Reminder Policy (WDRP) notices
- sending renewal reminders under ERRP
- applying the Transfer Policy
- responding to DNS Abuse reports
- implementing UDRP/URS decisions without delay
- fulfilling data retention requirements
- providing required documentation during ICANN audits

3. Collection and Processing of Personal Data

3.1. What Data Is Collected?

Under ICANN and Registry rules, the following data is collected during the domain registration process:

- full name or company name
- address information
- phone number
- email address
- technical, billing, and administrative contact details
- IP addresses and transaction logs
- nameserver information
- registration and renewal history
- payment details (credit card numbers are not stored)

3.2. Purpose of Data Processing

Collected data is processed solely to:

- create and manage domain registrations
- perform renewal and transfer operations
- exchange required data with Registry Operators
- comply with ICANN policies
- fulfill legal obligations
- provide technical support

Data is **not sold or transferred to third parties for marketing purposes**.

3.3. Data Sharing

Data may be shared only with the following entities:

- ICANN (for audit and compliance purposes)
- Registry Operators (Verisign, PIR, Donuts, TRABIS, etc.)
- UDRP/URS providers (WIPO, NAF, etc.)
- law enforcement and judicial authorities
- fraud detection and security systems
- Atak Domain's infrastructure service providers

Sharing occurs solely when required by law or ICANN obligations.

4. Whois and GDPR Compliance

Atak Domain applies Whois data redaction in accordance with GDPR and the ICANN Temporary Specification.

Non-public information:

- name and surname
- phone number
- email address
- physical address
- technical and billing contacts

Publicly displayed information:

- domain status codes
- nameserver information
- registration date
- expiration date
- registrar name

Exceptions apply for lawful requests and UDRP/URS processes.

5. Data Retention Period

Under ICANN RAA 3.4, the following data must be retained for at least 2 years:

- domain registration agreements
- Whois verification records
- transfer approval/denial documentation
- transaction logs

Atak Domain may retain certain data longer when required by tax or financial regulations.

6. Use of Third-Party Service Providers

Atak Domain may utilize third-party vendors for:

- DNS services

- server and cloud infrastructure
- security and DDoS mitigation
- email infrastructure
- fraud detection systems

All such providers are bound by data confidentiality agreements.

7. DNS Abuse Policy

In accordance with ICANN RAA 3.18, Atak Domain responds to DNS Abuse reports.

DNS Abuse includes:

- phishing
- malware and virus distribution
- botnet command and control
- pharming
- spam (when used as a vehicle for abuse)
- child sexual abuse content
- financial fraud content

Reports are accepted at: domain@apiname.com

8. Registrant Rights and Responsibilities

All customers are subject to the following ICANN documents:

- Registrant Rights & Responsibilities
- ICANN Educational Materials
- Transfer Policy
- ERRP (Expired Registration Recovery Policy)
- WDRP (Whois Data Reminder Policy)

Atak Domain sends required notices as part of these policies.

9. Proxy and Whois Privacy Services

Atak Domain may offer Whois privacy/proxy services in accordance with ICANN policies.

However, some TLDs prohibit privacy services (e.g., .US and certain ccTLDs).

Even when privacy is active, data may be disclosed in the following situations:

- lawful government requests
- ICANN requirements
- UDRP/URS proceedings

10. Domain Transfer Processes

All domain transfers are performed in compliance with the ICANN Transfer Policy.

This includes:

- providing AuthCode
- managing transfer locks (clientTransferProhibited)
- enforcing the 60-day transfer restriction
- blocking transfers during UDRP cases
- notifying customers regarding transfer events

Transfer-related inquiries: hukuk@atakdomain.com, domain@apiname.com

11. Implementation of UDRP / URS Decisions

Atak Domain promptly implements decisions from approved dispute resolution providers, including:

- WIPO (World Intellectual Property Organization)
- NAF (National Arbitration Forum)
- ADNDRC

Customers are notified after implementation.

12. Evaluation of Legal Requests

Atak Domain may share data upon receiving valid written requests from:

- courts
- prosecutors
- law enforcement agencies
- international legal authorities

Requests must be issued through verifiable and official channels.

13. Disclaimer of Responsibility

Atak Domain:

- is not responsible for customer content or domain usage
- is not obligated to monitor or supervise customer activity
- may disclose data only when required by ICANN or legal regulations
- operates domain services under ICANN and Registry rules

14. Contact Information

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