

## Whois Privacy / GDPR Redaction Policy

(Atak Domain Bilgi Teknolojileri A.Ş.)

### 1. Purpose and Scope

This policy is prepared to regulate the following processes within the domain name registration services provided by Atak Domain:

- Hiding personal data from public Whois
- Automatic data redaction (masking) under GDPR
- Manual removal of data upon request
- Providing information to legal authorities

This policy is based on ICANN RAA 2013, the ICANN GDPR Temporary Specification, and applicable data protection laws.

It applies to all gTLDs, nTLDs, and most ccTLDs.

### 2. What is Whois?

Whois is a publicly accessible directory containing technical and administrative information about domain names.

Due to GDPR regulations implemented after 2018, Whois no longer displays full records; many data fields are automatically masked.

Atak Domain uses two systems:

- GDPR Redaction (automatic masking)
- Whois ID Protect / Proxy Service (full privacy service)

1

### 3. Automatic Redaction under GDPR

#### 3.1. Which information is automatically hidden?

Atak Domain automatically masks the following information for individuals who are EU/EEA citizens or located within the EU, as required under GDPR:

Data Type	Masked?
Full Name	✓ Masked
Email Address	✓ Masked
Phone Number	✓ Masked
Fax Number	✓ Masked
Postal Address	✓ Masked
IP address / technical logs	✓ May be masked under GDPR

Data Type	Masked?
Corporate name	✗ Not masked (companies are not considered personal data under GDPR)

Masked data will appear in Whois output as “REDACTED FOR PRIVACY”.

### 3.2. Which data remains visible?

The following technical information is not hidden:

- Domain registration date
- Domain expiration date
- Registrar information
- Nameserver details
- Domain ID
- DNSSEC status
- Technical operational data

### 3.3. Who is subject to automatic redaction?

- EU citizens
- Individuals residing in the EU
- Personal (individual) domain registrants
- All registrants covered by GDPR

Corporate customers → Automatic GDPR redaction may not apply (corporate data is not considered personal data).

2

## 4. Whois ID Protect / Proxy Service

While GDPR redaction is applied automatically, Proxy Service is an optional additional privacy layer.

When Proxy is active:

- Atak Domain’s privacy contact details appear in Whois
- The real domain owner’s identity is fully hidden
- Spam, scraping, and phishing attempts against Whois data are blocked

Example proxy Whois output:

- Registrant Name: Domain Privacy Service – Atak Domain
- Registrant Email: [domain@apiname.com](mailto:domain@apiname.com)
- Address: Redacted for privacy
- Phone: +90XXXXXXXXX

## 5. Situations Where Redaction Does Not Apply

Atak Domain may disclose personal data without masking in the following scenarios:

### 5.1. Requests from official authorities

- Prosecutor’s Office

- Courts
- BTK / TRABIS
- ICANN UDRP / URS processes
- Law enforcement (cybercrime units)

If the request includes valid legal grounds, redaction may be lifted.

## 5.2. Abuse and legal violations

Under ICANN RAA 3.18, privacy/proxy or redaction may be removed if the domain is associated with:

- Phishing
- Malware
- Botnets
- Fraud
- Trademark infringement (UDRP)
- Illegal content (e.g., child exploitation)

## 5.3. ICANN & Registry Requirements

Some TLD registries (especially ccTLDs) may not permit Whois privacy, including:

- .US
- .CA (in some cases)
- .AU
- .CN
- .TR (TRABIS requirements)

3

## 6. Data Access Requests (Disclosure Requests)

Third parties requesting the real registrant's information must meet the following conditions:

- Provide evidence of rights infringement (e.g., trademark certificate, copyright proof)
- Demonstrate a clear connection between the infringement and the domain
- Verify the requester's identity
- Demonstrate a legitimate legal purpose

Non-legal "random information requests" will be rejected.

## 7. Data Retention

Atak Domain retains registrant data for at least 2 years after the termination of the domain agreement, as required by ICANN.

- In-account customer data → can be deleted upon request
- Whois data → cannot be deleted due to ICANN rules

## 8. Disclaimer

- Whois privacy does not guarantee full protection against malicious use
- Proxy service does not remove the registrant's legal responsibilities

- The domain owner is always responsible for the content on the domain
- Atak Domain cannot be held responsible for incorrect or incomplete registrant submissions

## 9. Policy Updates

This policy may be updated by Atak Domain in response to changes in ICANN or GDPR regulations.

Users are responsible for regularly reviewing the Policy.