# GDPR and .AS Domain Registry

## What is there to be worried about?

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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:

| Origin of Registrations | Percentage of Registrations |
|---|---:|
| American Samoa + United States | 6% |
| Non-EU/EU Geographic locale states | 10% |
| EU Members | 21% |
| EU Members + Geographic locale states | 63% |

# 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 Registratation 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