NOTE: This is a non-authoritative translation of the *Privacy policy and processing of Personal Data of the DOMINI.AD Registry*. In case of discrepancy between this translation and the original document in Catalan, the latter will prevail.

Privacy policy and processing of personal data of the DOMINI.AD Registry

".ad" is the Internet domain corresponding to the Principality of Andorra. ANDORRA TELECOM, S.A.U. is entrusted with the authority to register the Internet domain names. For this purpose, it has created the DOMINI.AD registry (hereinafter, the "**Registry**" or "**DOMINI.AD Registry**").

This policy informs that in order for the DOMINI.AD Registry to function, it needs to collect personal data from domain applicants/registrants. These data are collected through the certified registrars, who are the ones who interact with the customers.

Registrars must provide personal data to the Registry and the Registry, for the proper functioning of the Internet, must publish them in WHOIS/RDAP (Registration Data Access Protocol), a protocol developed by the IETF (Internet Engineering Task Force) that allows only authorised users to know information related to domain names, all in accordance with the European Data Protection Regulation and the Law 29/2021, of 28 October, on Personal Data Protection (hereinafter the "**LQPD**").

1.   Identification and contact information of the data controller

The personal data collected through the DOMINI.AD Registry will be processed under the responsibility of ANDORRA TELECOM, S.A.U. (hereinafter, "**ANDORRA TELECOM**"), with address at C. Mn. Lluís Pujol, 8-14, Santa Coloma, AD500 Andorra la Vella, Principality of Andorra and email address: protecciodades@andorratelecom.ad.

2.   Personal data we process

The data that ANDORRA TELECOM processes through the DOMINI.AD Registry are adequate, relevant, and limited to the data necessary to comply with the purposes described in this Policy.

The data processed by ANDORRA TELECOM are the following:

a)   Registrars' data: the contact information of the registrar who, on behalf of his customers (applicant/domain registrants), wants to register and/or modify and/or delete a domain in the DOMINI.AD Registry. These data include contact information: name and surname of the registrar (natural person or legal entity), contact person, postal address, email address and telephone number.

b)   Data of applicants/registrants from the .ad domain provided by the registrars: the personal data of the registrar's customers who are interested in applying for the registration of a .ad domain. These data include: name and surname (natural person or legal entity), contact person, postal address, email address, contact telephone number and information contact of an administrative contact who

may be identical or different from the registrant/applicant. In case of consent of the interested party, we will collect and process data of the technical contact and the billing contact for the purpose of complying with the objects of the contract entered into with the applicant. Optionally, the registrant may provide the same set of data on a technical contact and a billing contact, if so desired or requested by the corresponding registrar, but which are not mandatory for the registry.

Finally, the registrar may request other data (e.g., means of payment), but these are in no case defined, requested or processed by the DOMINI.AD registry. These certified registrars must have an appropriate and updated privacy policy, and they must inform customers that their data may be transferred to Andorra Telecom, S.A.U., through the DOMINI.AD Registry in order to carry out the registration of the .ad domain.

3.   Purposes and legitimisation of the personal data processing

The purpose of the collection and processing of personal data is to manage the registration, modification, and deletion of .ad domains, to administer and protect the registration services, as well as to request information or resolve complaints and incidents related to the DOMINI.AD Registry by registrars and/or domain applicants/registrants.

The legitimisation for the management of the registration, modification, and deletion of domains and request for information will be the consent of the interested party. The legitimisation to protect the registration services is the legitimate interest of the responsible party. And the legitimisation for the resolution of complaints and incidents related to the DOMINI.AD Registry is the compliance with a legal obligation.

We will not process your personal data for any purposes other than those described above unless required to do so by law or court order.

Requests for information that are sent to us require the interested party to provide us, voluntarily, with the data necessary to be able to respond to him/her and/or provide him/her with the services. The obligatory nature or necessity of providing these data will be marked with an asterisk (*) on the forms or in the sections corresponding to each service. However, the interested party may freely refuse to provide us with these data or, subsequently, revoke the consent previously granted to process his/her data, although this refusal will make it impossible for us to respond to his/her request or provide him/her with the service in question. ANDORRA TELECOM understands that, by providing us with these data, the interested party guarantees and accepts responsibility for its truthfulness, currency, and accuracy and expressly accepts and consents to its processing for the purposes described above.

4.   Retention of personal data

The personal data of the interested parties of each of the processing operations will be kept for the time necessary to comply, in each case, with the purpose for which they were collected and to determine any possible liabilities that may arise from this purpose and from the processing of the data, counted from the end of the relationship with the DOMINI.AD Registry.

In compliance with the provisions of art. 30 LQPD, DOMINI.AD will be obliged to block the data when it proceeds to its rectification or deletion under the terms provided by Law. The blocking of the data consists of their identification and reservation, adopting technical and organisational measures to prevent their processing, including their visualisation.

The data will also be deleted when they are no longer necessary for the purpose for which they were sent and their retention is not required or permitted by any legal provision.

Finally, obsolete data from existing domains (e.g., old email addresses) and from non-existing domains (because they have been deleted or not renewed) will be retained for a period of five (5) years.

Once the retention period and the legal deadlines for determining possible responsibilities have elapsed, DOMINI.AD will proceed to destroy the data.

5.   Access to data: WHOIS/RDAP services

The Registry and the .ad domain registrar make available, for the public on the Domain Name Registration Data Directory Service, also known as the WHOIS and/or RDAP database, the following date:

- Name of the registrant (company name in the event of a legal entity, and name and surnames in the event of a natural person), provided that express consent of the interested party has been provided.
- Geographic location where the domain registrant is located.

Physical address, email address and telephone number of the domain registrant shall not be communicated nor published, in no case.

Administrative and technical contact information will be published in the WHOIS and/or RDAP if consent has been obtained. The billing contact information is not published.

Annex 1 of this document includes an example of all possible personal data fields collected and their respective publication regime.

Occasionally, we enter into contracts with third parties so that they can assist us in providing the service to you (for example, information technology and storage services). Our contracts with these third parties forbid them from using any of your personal information for any purpose beyond the purpose for which they were shared.

6.   Access to non-public data

If required by law or if we are legally required to do so, we may disclose your personal data to courts of law, law enforcement authorities and other relevant third parties to conduct an investigation, respond to a subpoena or court order from a third party or law enforcement, initiate legal action or prevent harm as a result of infringements of intellectual and/or industrial property rights or other legal rights of third parties, and infringements of local and international regulations.

Third parties with a legitimate interest in obtaining the registration data (e.g., the police, the courts, the competent administrative bodies, the holders of Intellectual Property Rights or persons with another specific legitimate interest in a specific .ad domain) may request individualised access to the registration data from both the registry and the corresponding registrar by filling in a form identifying the legitimate interest on the basis of which they are requesting access.

Only if such legitimate and justified interest is verified on a case-by-case basis, the data will be made available to them. The DOMINI.AD Registry may establish privileged requestors who may have simplified access (e.g., police, competent courts, internet security agencies, etc.).

In addition, the DOMINI.AD Registry and the registrars may have a contact form for registrants. Using this form, third parties may contact registrants without obtaining the personal data of the registrants to whom they are addressed.

7.   Rights of the interested parties

In accordance with the LQPD, interested parties may at any time exercise their rights of access, rectification and erasure, limitation of processing, data portability, the right to object and the right not to be subject to individualised decisions.

Interested parties may exercise the aforementioned rights by sending an email to protecciodades@andorratelecom.com with the subject "**Sol·licitud d'exercici de drets**" or "**Protecció de Dades**", attaching a copy of their identity document.

Additionally, interested parties may contact the Andorran Data Protection Agency.

Annex 1:

Data of the Registrant processed by the DOMINI.AD Registry and publication regime

Note: the original names of the fields have been left in English (EPP standard), although they will be translated and, therefore, the publication of these fields will be in Catalan:

Domain Name:	EXEMPLE.AD
Updated Date:	2009-05-29T20:13:00Z
Creation Date:	2000-10-08T00:45:00Z
Registration Expiry Date:	2010-10-08T00:44:59Z

Registrant Name: **[IT IS COLLECTED, BUT NOT PUBLISHED, UNLESS THE REGISTRANT, NATURAL PERSON, AUTHORISES IT EXPRESSLY]**

Registrant Organization: **[PUBLISHED ONLY IF IT IS A LEGAL PERSON]**
Registrant Street: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Registrant City: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Registrant State/Province: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Registrant Postal Code: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Registrant Country: AD
Registrant Phone: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Registrant Phone Ext: **[OPTIONAL. NOT PUBLISHED]**
Registrant Fax: **[OPTIONAL. NOT PUBLISHED]**
Registrant Fax Ext: **[OPTIONAL. NOT PUBLISHED]**
Registrant Email: **[IT IS COLLECTED, BUT NOT PUBLISHED]**

Admin Name: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin Organization: ORGANISATION NAME **[PUBLISHED ONLY IF IT IS A LEGAL PERSON]**
Admin Street: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin City: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin State/Province: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin Postal Code: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin Country: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin Phone: **[IT IS COLLECTED, BUT NOT PUBLISHED]**
Admin Phone Ext: **[OPTIONAL. NOT PUBLISHED]**
Admin Fax: **[OPTIONAL. NOT PUBLISHED]**
Admin Fax: **[OPTIONAL. NOT PUBLISHED]**
Admin Email: **[IT IS COLLECTED, BUT NOT PUBLISHED]**

.ad

[THE TECHNICAL CONTACT AND ASSOCIATED DATA ARE OPTIONAL IN ANY CASE]:

Tech Name:	[OPTIONAL. NOT PUBLISHED]
Tech Organization:	[OPTIONAL. NOT PUBLISHED]
Tech Street:	[OPTIONAL. NOT PUBLISHED]
Tech City:	[OPTIONAL. NOT PUBLISHED]
Tech State/Province:	[OPTIONAL. NOT PUBLISHED]
Tech Postal Code:	[OPTIONAL. NOT PUBLISHED]
Tech Country:	[OPTIONAL. NOT PUBLISHED]
Tech Phone:	[OPTIONAL. NOT PUBLISHED]
Tech Phone Ext:	[OPTIONAL. NOT PUBLISHED]
Tech Fax:	[OPTIONAL. NOT PUBLISHED]
Tech Fax Ext:	[OPTIONAL. NOT PUBLISHED]
Tech Email:	[OPTIONAL. NOT PUBLISHED]

[THE BILLING CONTACT AND ASSOCIATED DATA ARE OPTIONAL IN ANY CASE]:

Billing Name:	[OPTIONAL. NOT PUBLISHED]
Billing Organization:	[OPTIONAL. NOT PUBLISHED]
Billing Street:	[OPTIONAL. NOT PUBLISHED]
Billing City:	[OPTIONAL. NOT PUBLISHED]
Billing State/Province:	[OPTIONAL. NOT PUBLISHED]
Billing Postal Code:	[OPTIONAL. NOT PUBLISHED]
Billing Country:	[OPTIONAL. NOT PUBLISHED]
Billing Phone:	[OPTIONAL. NOT PUBLISHED]
Billing Phone Ext:	[OPTIONAL. NOT PUBLISHED]
Billing Fax:	[OPTIONAL. NOT PUBLISHED]
Billing Fax Ext:	[OPTIONAL. NOT PUBLISHED]
Billing Email:	[OPTIONAL. NOT PUBLISHED]

Name Server:	NS01.EXEMPLEREGISTRADOR.AD
Name Server:	NS02.EXEMPLEREGISTRADOR.AD
DNSSEC:	signedDelegation
DNSSEC:	unsigned

>>> Last update of WHOIS database: 2009-05-29T20:15:00Z <<<