

# NIS 2 Policy

## Document Purpose, Scope and Status

This document covers Com Laude Group Limited's (**Com Laude's**) policies and procedures, including verification procedures, to ensure its database of domain name registration data contains accurate and complete information. It also covers Com Laude's policies and procedures for disclosure of specific domain name registration data to legitimate access seekers upon lawful and duly substantiated requests. This document is made publicly available in compliance with Art 28(3) and Article 28(5) of **Directive (EU) 2022/2555 on measures for a high common level of cybersecurity across the Union (NIS 2 Directive)**.

For the avoidance of doubt, the contents of this document are not intended to form part of any contractual relationship with a client, and no express or implied warranties are intended to be given in it. The policies and procedures identified in this document are subject to change in compliance with

- applicable legislation and regulations,
- changes required by Com Laude's contracts with the Internet Corporation for Assigned Names and Numbers (ICANN) and with internet domain name registries, and
- good industry practice.

## Introduction and Overview

Com Laude is an ICANN Accredited Registrar with over 20 years' experience of providing domain name registrar and management services for top-tier organisations around the globe. It recognises the trust placed in it by clients to protect their domain name intellectual property and associated key operational services such as DNS and digital certificate management. The accuracy and proper management of the domain name registration data held by Com Laude for its clients is a foundational component of everything that Com Laude does.

Although the NIS 2 Directive does not apply to the UK, Com Laude, by having a subsidiary in the EU, will come within its scope. The Directive requires entities providing domain name registration services to collect and maintain accurate and complete domain name registration data in a dedicated database with due diligence, and in accordance with European Union data protection law as regards data which are personal data (Art 28(1)). The Directive also requires such entities to have policies and procedures including verification procedures in place to ensure that the databases contain accurate and complete information and make such policies and procedures publicly available (Art 28(3)). Article 28(4) requires such entities to make publicly available, without undue delay after the registration of a domain name, the domain name registration data which are not personal data. They must also provide access to specific domain name registration data upon lawful and duly substantiated requests by legitimate access seekers in accordance with EU data protection law and make publicly available policies and procedures with regard to the disclosure of such data (Article 28(5)). This document sets out the policies and procedures required by Article 28.

Com Laude's Chief Operating Officer has responsibility for domain name registrations and Com Laude's compliance with ICANN requirements and agreements. Com Laude was ISO/IEC 27001:2013 certified in 2014 and this was updated to ISO/IEC 27001:2022 in 2023. Com Laude has a mature and comprehensive Information Security Management System (**ISMS**) in place. The ISMS scope was extended in 2022 to include certification for ISO/IEC 27701:2019 (Privacy Information Management).

Com Laude complies with all its obligations in its Registrar Accreditation Agreement with ICANN (RAA) and the ICANN specifications and Consensus Policies applicable to Accredited Registrars. These include the ICANN [RDDS Accuracy Program Specification](#) (formerly called the WHOIS Accuracy Program Specification) relating to verification and accuracy of registration data as amended from time to time by ICANN.

Com Laude complies with the EU GDPR, UK GDPR and UK Data Protection Act 2018 and other applicable data protection legislation in deciding whether to disclose registration data that is personal data to legitimate access seekers. Com Laude also complies with ICANN's [Registration Data Policy](#) as well as the RAA in deciding whether to disclose such data.

## Data accuracy and verification

### **Registrar Accreditation Agreement between Com Laude and ICANN (RAA) and Registry Registrar Agreements with registries (RRAs)**

Com Laude, as a domain name registrar, collects and holds domain name registration data in order to register and/or manage domain names for its clients. The registration data Com Laude holds in its database includes the necessary information to identify and contact the holders of the domain names and the points of contact administering the domain names under the TLDs. It includes the domain name, date of registration, the registrant's name, contact email address and telephone number and the contact email address and telephone number of the point of contact administering the domain name in the event they are different from those of the registrant.

As required by its agreements with ICANN (RAA) (for generic Top-Level Domains (gTLDs)) and individual registries (RRAs) (for country code Top-Level Domains (ccTLDs)), Com Laude provides necessary registration data to registries for registration of the domain names and to data escrow providers.

As a corporate registrar, nearly all of Com Laude's clients are companies. Com Laude has a long-established relationship with many of them. These companies will inform Com Laude of the employees authorised to act as contacts and of changes to these contacts. Com Laude checks the accuracy of registration data provided to it by registrants of gTLD domain names and verifies email addresses of client contacts. Com Laude carries out reasonable and commercially practicable (a) verification, at the time of registration, of contact information associated with a Registered Name sponsored by Com Laude and (b) periodic re-verification of such information, in accordance with ICANN mandated procedures.

Where Com Laude's RRA with a particular registry (including ccTLD registries) requires other validation procedures, Com Laude complies with those procedures in respect of the domain names at that registry.

Com Laude contractually requires the registrants to provide accurate information as described in the “Registrant Contract with Com Laude” section below. Com Laude sends a yearly Registration Data Reminder Notice to all registrants of gTLDs, and of ccTLDs where required by the registry, notifying them of their obligation to maintain the accuracy of their registration data and to notify Com Laude of any changes. This is done in accordance with ICANN’s [Registration Data Reminder Policy](#) or the relevant registry’s rules.

Com Laude complies with any notices it receives from ICANN or a registry requiring it to take reasonable steps to investigate and correct any inaccuracy in the contact information associated with domain names it manages.

As a registrar providing a personalised corporate service, Com Laude will generally be in contact with the client via telephone/ MS Teams or email throughout the contract and thereby be kept informed about changes in the ordinary course of business.

## **Registrant Contract with Com Laude**

Before registering a domain name on behalf of a client, Com Laude enters into a written agreement with the client for domain name services (registrant contract) in accordance with the Registrar Accreditation Agreement between Com Laude and ICANN (RAA). The registrant contract requires the client to provide accurate and reliable contact details and update them within 7 days of any change. Com Laude is entitled to suspend and/or cancel the registration if the client

- (i) fails to provide accurate and reliable contact details
- (ii) wilfully provides inaccurate or unreliable information
- (iii) wilfully fails to update information within seven (7) days of any change or
- (iv) fails to respond for over 15 days to inquiries by Com Laude concerning the accuracy of contact details associated with the registration.

## **Accuracy and Verification Procedures**

The procedures that Com Laude takes to ensure the accuracy and completeness of the registration data it holds are set out below:

- Domain Registration Process

On receipt of a request for domain name registration, Com Laude obtains from and confirms the registration data with the registrant. This information is received from the registrant by email, thereby verifying the registrant contact email address. Com Laude checks the requestor's authority, domain registration eligibility and WHOIS snapshot of the domain name, and carries out the validation and verification requirements as required by any registry. Verification of Whois data is carried out via Com Laude's portal (DNS Dashboard) sending automated emails to the registrant and recording the response. Com Laude sends yearly requests to registrants to update their registration data where required (ccTLDs where required by the registry and gTLDs.) The registrant is required to enter into the registrant contract with Com Laude described above.

- Domain Name Transfer-In Process

In respect of every transfer-in of a domain name from another registrar, Com Laude confirms the correct contact details for the registrant, and if applicable, nameserver information for the domain name concerned, configuration of 3rd party servers, and requests the Zone File. The Zone file is checked and the registrant is asked to confirm accuracy of the record.

- Change in Key Client Contact

When advised that the contact information for a domain name has changed, Com Laude verifies the new contact and changes contact details in Com Laude's databases and portals accordingly. Com Laude deactivates access to and removes any sensitive documentation relating to the former contact from the Com Laude portals and databases.

- WHOIS Inaccuracy notices

Where Com Laude receives a WHOIS inaccuracy notification from ICANN, the Chief Operating Officer ("COO") is informed, and the matter is investigated. Com Laude communicates with the client/registered name holder, verifies new contact details with the client/registered name holder and amends the records accordingly.

- UDRP Complaint Internal Process

When a complaint and verification request is received by Com Laude under the UDRP Complaint Internal Process, Com Laude confirms it is the registrar for the domain complained about, checks that the registrant information is up to date and requests locking of the domain. Com Laude responds to the verification request within 2 business days of receipt.

## Disclosure of data

In compliance with applicable data protection laws, ICANN's Registration Data Policy, ICANN's Registration Data Directory Services (RDDS) Specification and other ICANN or registry requirements for disclosure of registration data (as amended from time to time) Com Laude makes certain data in its domain name registration database publicly accessible via the searchable RDDS service on the Com Laude [website](#). Also on the Com Laude website, there are instructions to contact [abuse@comlaude.com](mailto:abuse@comlaude.com) to request any registration data not accessible via the RDDS Com Laude service.

Com Laude's policy on access to registration data is set out on the website here [Access - Com Laude](#). Com Laude may disclose certain non-public registration data to legitimate access seekers who have appropriately substantiated their request.

### Disclosure Procedures

The procedures that Com Laude takes in relation to disclosure of the registration data it holds are set out below:

- [Registration Data Directory Services \(RDDS\)](#)  
Com Laude provides a searchable link to registration data on its [website](#). Certain data is redacted for privacy. However, where a client opts to un-redact registration data to disclose personal data, and provides written consent from an authorised person, the data is un-redacted in the registration data entry.
- [Emails to abuse@comlaude.com](mailto:abuse@comlaude.com)

Requestors of non-public registration data are directed to submit their request to [abuse@comlaude.com](mailto:abuse@comlaude.com), providing specified details and proof of identity.

Emails to the [abuse@comlaude.com](mailto:abuse@comlaude.com) inbox identified as having substance are investigated. Within 24 hours of receipt of verified requests from Law Enforcement Agencies for client registration data, Com Laude responds providing that information. Emails from other requestors of information are dealt with as appropriate in the circumstances. Emails are sent to the client requesting their investigation and action (except where prohibited by an Law Enforcement Agency or by law).

- Telephone calls to Com Laude's 24-hour emergency number  
Where telephone calls to Com Laude's 24-hour emergency number are received from Law Enforcement Agencies, the call is forwarded to the designated persons, logged and investigated. The findings and actions are reported to the LEA within 24 hours.
- ICANN's Registration Data Request Service (RDRS)  
ICANN operates a trial Registration Data Request Service (RDRS) at this link [Home - Registration Data Request Service \(icann.org\)](https://www.icann.org/home/registrar-registration-data-request-service). Participation by registrars in offering this service is voluntary, and Com Laude has volunteered. A person seeking access to registration data may do so by using that service. Requests relating to domains managed by Com Laude will be directed by the RDRS service to Com Laude for a response. Com Laude will respond to the requestor in a similar way to requests sent by email to [abuse@comlaude.com](mailto:abuse@comlaude.com).