

Global Name Registry Compliance Training

Individual Responsibility for
Adherence to ICANN Obligations

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- **ICANN: The Internet Corporation for Assigned Names and Numbers**
Responsible for domain name system management and other technical functions.
- **The Global Name Registry, Limited (“Global Name Registry”)**
Designated by contract with ICANN as the registry operator for the .name TLD.

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Terminology (cont'd)

- IP address

A unique number that identifies a discrete device on the Internet.

- Domain Name

A name that identifies one or more IP addresses. Saves typing in the IP number.

- DNS

The Domain Name System. Translates domain names into IP address.

- Top/Second Level Domain (TLD/SLD)

Top: .name, .com, .org, .uk etc. Second: *smith.name*, *hotmail.com*.

- NDA

Non-Disclosure Agreement.

- SRS

Shared Registration System.

Organizational Conflict of Interest Compliance Plan - Structure

- **Organization Structure**

Global Name Registry is a wholly-owned subsidiary of GNR Limited

- **Financial Separation**

Global Name Registry maintains separate accounts from GNR Limited.

- **Locational Separation**

Global Name Registry conducts business and technical operations from a different premises to any ICANN-accredited registrar.

- **Physical Barriers**

Only those employed or contracted by Global Name Registry have regular badge access. All others use sign in/sign out procedure.

Organizational Conflict of Interest Compliance Plan – General

- Global Name Registry must operate as a neutral provider of DNS Registry Services
- All ICANN-Accredited Registrars (“Registrars”) are eligible to enter into a Registry-Registrar Agreement (“RRA”) with Global Name Registry to sell .name
- All Registrars in compliance with their RRA must be given equivalent access to Global Name Registry’s registry services
- Global Name Registry must comply with the Registry Code of Conduct

Registry Code of Conduct

- No preferential treatment
- Equal access for Registrars
- No warehousing of domains
- Registrars who are affiliates – separate accounts
- No access to Registrar user data or proprietary information
- No sharing of Registrar proprietary information unless necessary for Registry purposes
- Confidential Information not to be shared with other registry operators or Registrars unless necessary for Registry purposes
- No director to sit on Registrar board if Registrar obtains registry services
- Employee limitation on investment in any company obtaining registry services = 5%
- No employee can also be employed by any Registrar
- Protection of user data or proprietary information of the Registry
- No determination of any entity's right to a particular domain name

- Note that this Code of Conduct is described in more detail in the Compliance Manual distributed to all employees.

Equivalent Access Policy

Every 6 months Global Name Registry must certify to ICANN the following (therefore all employees must abide by this policy) in respect of all Registrars:

- **Connection to SRS** by using same maximum number of IP addresses and SSL certificate authentication.
- **Software distributed** at the same time, terms and conditions.
- Same access to **customer support**.
- Same access to **resources re: disputes/technical/admin issues**.
- Same access to be able to **reconcile registration activities**.
- Able to perform **basic automated registrar account management** using same toolkit.
- **SRS not to include any algorithms or protocols** distinguishing between Registrars.
- **Treated identically** during landrush.
- **No preferential treatment** – by all officers, directors, employees and agents.
- **No preferential price structures**, if not available to all Registrars.
- Note that this Code of Conduct is described in more detail in the Compliance Manual distributed to all employees

Access to Data Policy

- Protects Proprietary and Registry Sensitive Information.
- Data not to be used to advantage one Registrar over others.
- Applies to all officers, directors, members, shareholders, employees, agents, consultants and subcontractors of Global Name Registry.
- Protected information includes:
 - “Proprietary/Confidential/Privileged” Information: financial, personnel, technical, business information owned/possessed by Global Name Registry and not authorized for public release.
 - Registry Sensitive Information: Any information, including the above, that could be used to advantage/disadvantage a Registrar over Registrar.
 - Computer Software (including documentation.)
 - Electronic and soft copies.

Access to Data Policy (cont'd)

- Managers responsible for identifying and instructing employees re: Registry Sensitive/Proprietary (“Confidential”) Information.
- Each employee must exercise reasonable care.
- Confidential Information may only be disclosed with prior written approval of an authorized Corporate Officer.
- A Non-Disclosure Agreement must be executed with outsiders prior to disclosure of Confidential Information.
- Always seek advice from Policy Team for all questions concerning release.

Access to Data Policy (cont'd)

- Legends: documents to be marked with the appropriate legend.
- Consult with the Compliance Officer if you are unsure.
- Lock away Confidential Information when not in use.
- Not to be visible to guests or anyone without a need to know. Face down on desks.
- Shred waste Confidential material. NEVER in rubbish bins.
- Obligations to protect Confidential Information extend beyond employment.
- We protect others' information as we do our own.

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Non-Disclosure Agreement

- Your signature confirms that you
 - Certify that the NDA has been read.
 - Certify full understanding of the NDA.
 - Agree to abide by all NDA requirements.
 - Understand that violation of the NDA may result in termination of your employment.
 - Please ensure that in the first instance you use the Global Name Registry form of NDA; if not, please have the legal department review any unfamiliar form.

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Avoidance Certifications

- Your signature confirms that you
 - Received Compliance Training.
 - Understand the issues and your obligations.
 - Will strictly comply with the Compliance Manual.
 - Will refrain from personal conflict of interest activities.
 - Report any conflict whether personal or organizational that is perceived or identified as a conflict during employment.