

PRIVACY POLICY - DOMANENNAME

Privacy and Personal Data Protection Notice

Version: 1.0 Effective Date: 18th May 2026 Company: CRISALEO LIMITED
Operating Domains: domanenname.com | domanenname.it | domanenname.eu
| domanenname.us | domanenname.de

Governing Law: The laws of England and Wales \((English Law)\), with
GDPR compliance for applicable territories

1. INTRODUCTION

CRISALEO LIMITED \("the Company", "we", "our", "Domanenname"\) is a
domain name registration intermediary. This Privacy Policy describes
how we collect, use, share, and protect personal data of customers.

Compliance Framework:

- Data Protection Act 2018 \((UK)\)
- UK General Data Protection Regulation \((UK GDPR)\)
- GDPR \((EU/EEA customers)\)
- CCPA \((California residents)\)
- Local data protection laws

2. DATA CONTROLLER

CRISALEO LIMITED Address: 7 Bell Yard, London, England, WC2A 2JR
Contact: privacy@domanenname.com Company Number: [UK Companies
House]

Data Protection Officer: Email: dpo@domanenname.com

3. PERSONAL DATA COLLECTED

3.1 Domain Registration Data \((Registrant Data)\)

ICANN requires the following data for domain registration:

- Full name and surname
- Complete postal address \((street, number, postcode, city, country)\)
- Primary email address
- International telephone number
- Telephone fax \((optional)\)
- Organisation/Company name \((if applicable)\)

Legal Basis: ICANN regulatory requirement Source: Provided by Customer during registration

3.2 Administrative and Technical Contacts

- Administrative contact \ (name, email, telephone\)
- Technical contact \ (name, email, telephone\)
- Billing contact \ (name, email, address\)

Legal Basis: ICANN regulatory requirement

3.3 Payment and Billing Data

- Partial credit card number \ (last 4 digits only\)
- Card expiration date \ (month/year\)
- Billing address
- Payment method used
- Transaction history

Legal Basis: Performance of contract

Security Note:

- Full card numbers are NOT stored by Domanenname
- Data transmitted via SSL/TLS encryption
- Processed through PCI-DSS Level 1 compliant gateways
- We do NOT store payment details for future charges

3.4 Control Panel Access Data

- Login username/email
- Password \ (stored as hashed value, bcrypt/Argon2\)
- Login IP addresses
- Login timestamps
- Active sessions
- Devices used

Legal Basis: Performance of contract \ (account security\)

3.5 Service Usage Data

- Domain registration history
- Renewal and transfer history
- DNS nameserver configurations
- Support tickets and communications
- Control panel activity logs

Legal Basis: Performance of contract

3.6 Communication Data

- Emails sent and received
- Support chat transcripts
- Feedback and survey responses
- Newsletter subscriptions \((if opted in\)

Legal Basis: Consent for marketing; contract for support

3.7 Technical Data

- IP address
- Browser type and version
- Operating system information
- Device information
- Pages visited
- Links clicked
- Time on page

Legal Basis: Legitimate interest \((service improvement\)

Tools: Google Analytics, Cloudflare, security monitoring

4. PURPOSES OF PROCESSING

4.1 Domain Registration and Management

Purpose:

- Register domain at appropriate registry
- Maintain WHOIS public record
- Process renewals and transfers
- Manage technical DNS configuration

Legal Basis: Performance of contract \((Art. 6\((1\)\)\(b\)\) UK GDPR\)

4.2 Billing and Payment

Purpose:

- Issue invoices
- Process payments
- Handle refunds
- Maintain financial records
- Anti-corruption compliance
- Tax reporting obligations

Legal Basis: Legal obligation \((Art. 6\((1\)\)\(c\)\) UK GDPR\)

4.3 Customer Support

Purpose:

- Respond to support requests
- Resolve technical problems
- Follow up on support tickets
- Service quality improvement

Legal Basis: Performance of contract + Legitimate interest

4.4 Service Communications

Purpose:

- Domain expiration reminders
- Registration and renewal confirmations
- Account security notices
- Policy updates

Legal Basis: Contractual obligation + Legitimate interest

4.5 Marketing \ (Optional\)

Purpose:

- Promotional offers
- Newsletter distribution
- Service announcements
- Customer satisfaction surveys

Legal Basis: Consent \ (Art. 6\ (1\)\ (a\)) UK GDPR\)

Unsubscribe: Click unsubscribe link in any email or manage preferences in control panel.

4.6 Analytics and Service Improvement

Purpose:

- Analyse platform usage
- Identify technical issues
- Improve user experience
- Service development

Legal Basis: Legitimate interest \ (Art. 6\ (1\)\ (f\)) UK GDPR\)

4.7 Legal Compliance and Fraud Prevention

Purpose:

- Verify customer identity \ (KYC\)
- Prevent fraud and abuse
- Comply with ICANN policy

- Respond to legal requests
- Law enforcement cooperation

Legal Basis: Legal obligation + Legitimate interest

5. DATA SHARING

5.1 Public WHOIS Database

The following data is AUTOMATICALLY PUBLISHED in the public WHOIS database by default:

- Registrant name
- Postal address
- Email address
- Telephone number
- Registration/expiration dates
- Nameserver information

Public Access:

- Available to anyone via WHOIS queries
- Indexed by search engines
- Accessible via public APIs

Privacy Protection: Optional WHOIS Privacy Protection \((paid service)\) masks this data.

5.2 Registry Disclosure \((Mandatory)\)

Registrant data is AUTOMATICALLY TRANSFERRED to ICANN registries:

Recipient: Registry managing the domain TLD Data: Complete registrant information Legal Basis: ICANN mandatory requirement Recipient's Privacy Policy: Applies separately

5.3 Registrar Partners

Data is transferred to our registrar partners for technical management:

Partners:

- OpenProvider \((Netherlands)\)
- eNom \((USA)\)
- Ascio Technologies \((Denmark)\)
- Twcoms Domains \((USA)\)

Data Shared: Complete registrant data, technical access data Legal Basis: Performance of contract \((necessary for service)\)

Data Protection:

- Standard Contractual Clauses \((SCC)\) in place
- Data Processing Agreements executed
- Recipients subject to GDPR or equivalent protections

5.4 Law Enforcement and Legal Requests

Domanenname may disclose personal data to authorities if:

- Required by court order or legal process
- Required for legal compliance
- Necessary to investigate illegal activity
- Necessary to protect Domanenname's rights

Customer Notification: We will notify Customer unless legally prohibited.

5.5 Acquisition or Corporate Changes

In case of acquisition, merger, bankruptcy, or asset sale:

- Personal data may be transferred
- Transferee must accept this Privacy Policy
- Customer will be notified
- Customer may terminate without penalty

5.6 Restriction on Sharing

Domanenname does NOT share personal data with:

- Marketing agencies \((without consent)\)
- Data brokers
- Advertising networks
- Social media platforms \((without explicit action)\)
- Other companies \((without consent)\)

6. INTERNATIONAL DATA TRANSFERS

6.1 Transfers Outside UK/EU

Personal data may be transferred outside UK/EU to:

- Registry partners \((USA, Netherlands, Denmark)\)
- Payment processors
- Cloud infrastructure providers
- Backup and disaster recovery services

6.2 Protection Mechanisms

For international transfers, we use:

- Adequacy Decisions: To countries with recognised data protection
- Standard Contractual Clauses \ (SCC\): EU-approved contract terms
- Consent: Explicit customer consent where applicable

6.3 Customer Rights for Transfers

Customers have right to:

- Know where data is transferred
- Understand protection mechanisms
- Request transfer documentation
- Object to transfers \ (where permitted\)
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7. DATA RETENTION

7.1 General Retention

Personal data is retained for:

- Active domains: Duration of registration + 1 year post-cancellation
- Payment data: Invoicing period + 7 years \ (tax requirements\)
- Log data: 12 months \ (security/audit\)
- Support records: 24 months \ (dispute resolution\)

Reason for Extended Retention:

- ICANN audit requirements \ (12 months post-cancellation\)
- UK tax retention requirements \ (6 years\)
- Legal claim time limits

7.2 Payment Information

- Partial card details: 3 years after last use
- Transaction history: 10 years \ (tax obligation\)

7.3 Security Logs

- Login logs: 12 months
- Failed login attempts: 6 months
- Active sessions: 24 hours after logout

7.4 Right to Erasure \ (Right to be Forgotten\)

Customer may request data deletion via:

Email: privacy@domanenname.com Web Form:
<https://domanenname.com/privacy-request>

Exceptions to Erasure:

- Active domain registration \((ICANN requirement)\)
- Tax record retention \((legal obligation)\)
- Ongoing legal proceedings
- Debt collection proceedings

Response Time: 30 days

8. SECURITY MEASURES

8.1 Encryption

- In Transit: SSL/TLS 256-bit \((HTTPS)\)
- At Rest: AES-256 encryption for databases
- Passwords: bcrypt/Argon2 hashing with salt

8.2 Authentication

- 2FA \((Two-Factor Authentication)\) available
- TOTP support \((Time-based One-Time Password)\)
- Unique login credentials required

8.3 Access Controls

- Principle of least privilege
- Role-based access control
- Segregation of duties
- Staff training on data handling

8.4 Monitoring and Threat Detection

- Firewall and IDS \((Intrusion Detection System)\)
- Web Application Firewall \((Cloudflare)\)
- DDoS protection enabled
- 24/7 anomaly monitoring

8.5 Backup and Disaster Recovery

- Daily encrypted backups
- Geographic replication \((multi-datacenter)\)
- RTO: 4 hours
- RPO: 1 hour

8.6 Testing and Compliance

- Annual penetration testing
- Weekly vulnerability scanning
- Bug bounty programme
- PCI-DSS Level 1 compliance
- ISO 27001 certified
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9. YOUR RIGHTS

9.1 UK GDPR Rights \ (UK/EU Customers\)

9.1.1 Right of Access \ (Art. 15\)

Right: Obtain a copy of all personal data held

How to Request:

- Control Panel: Settings > Privacy > Download Data
- Email: privacy@domanenname.com
- Web Form: <https://domanenname.com/access-request>

Response Time: 30 days

9.1.2 Right to Rectification \ (Art. 16\)

Right: Correct inaccurate or incomplete data

Correctable Data:

- Email address
- Telephone number
- Address \ (if not domain registrant\)
- Name \ (if not domain registrant\)

How to Request:

- Control Panel: Settings > Profile > Edit
- Email: support@domanenname.com

9.1.3 Right to Erasure \ (Art. 17\)

Right: Request data deletion \ ("Right to be Forgotten"\)

Exceptions:

- Active domain registration \ (ICANN requirement\)
- Tax records \ (legal obligation\)
- Legal proceedings pending
- Debt collection proceedings

Response Time: 30-60 days

9.1.4 Right to Restriction \ (Art. 18\)

Right: Request processing be restricted \ (paused temporarily\)

Grounds:

- You contest accuracy of data
- Processing is unlawful
- Data is no longer needed
- You have objected to processing

9.1.5 Right to Data Portability \ (Art. 20\)

Right: Receive data in structured, machine-readable format

Available Data:

- Registrant information
- Transaction history
- Control panel data

Format: CSV, JSON, XML

9.1.6 Right to Object \ (Art. 21\)

Right: Object to processing for specific purposes

Objectionable Processing:

- Marketing communications
- Profiling for marketing
- Processing based on legitimate interest

How: Click unsubscribe link in emails or manage preferences in control panel

9.1.7 Rights Regarding Automated Decisions \ (Art. 22\)

Right: Not be subject to fully automated decision-making

Domanenname does NOT use fully automated decisions with legal effect. Domain suspension/cancellation involves human review.

9.2 CCPA Rights \ (California Residents\)

9.2.1 Right to Know

Right to know what personal data is collected, used, and shared.

9.2.2 Right to Delete

Right to request deletion of personal data.

Exceptions: Data necessary for service delivery or legal compliance.

9.2.3 Right to Opt-Out

Right to opt-out of "sale" \(\(sharing for value received\)\).

Domanenname Position: We do NOT sell personal data in CCPA sense.

9.2.4 Right to Non-Discrimination

Domanenname cannot discriminate for exercising CCPA rights \(\(e.g.,\) Tj ET BT /F

9.3 How to Exercise Your Rights

Contact Methods:

- Email: privacy@domanenname.com
- Web Form: <https://domanenname.com/privacy-request>
- Phone: +44 [number] \(\(identity verification only\)\)

Identity Verification:

- Government-issued ID copy
- Email or SMS verification
- Security question answers

Response Times:

- Acknowledgement: 5 working days
- Full response: 30 days \(\(extendable to 60 days if complex\)\)

10. COOKIES AND TRACKING

10.1 Cookie Types Used

Type	Name	Purpose	Duration		Essential
Session management	Session	Session	Session	csrf_token	CSRF protection
preferences \(\(language, theme\)\)		Functional	1 year	user_preferences	UI preferences
Analytics		Analytics	2 years	_ga	Google Analytics session
			24 hours	_gid	Google Analytics session

10.2 Consent to Non-Essential Cookies

We display a consent banner on first visit. Non-essential cookies are only used with consent.

Banner Options: Accept All / Reject All / Manage Preferences

10.3 Cookie Management

Manage cookies via:

- Browser settings: Tools > Options > Privacy > Cookies
- Domanenname settings: <https://domanenname.com/cookie-settings>
- Do Not Track \((DNT)\): We respect browser DNT preference

10.4 Third-Party Cookies

Third-party services use cookies:

- Google Analytics \((analytics)\)
- Cloudflare \((security)\)
- Stripe \((payments)\)

See their privacy policies for opt-out options.

11. CONTACT AND COMPLAINTS

11.1 Privacy Contacts

Data Protection Officer: Email: dpo@domanenname.com

Privacy Team: Email: privacy@domanenname.com Web:
<https://domanenname.com/privacy>

Data Subject Request: <https://domanenname.com/privacy-request>

11.2 Complaints Process

If you believe your rights have been violated:

1. Contact Domanenname: privacy@domanenname.com
2. Escalation: DPO for internal review
3. Supervisory Authority:
 - UK: Information Commissioner's Office \((ICO)\)
 - EU: Your national data protection authority
 - California: California Attorney General

12. POLICY CHANGES

Domanenname may update this Privacy Policy with 30 days' notice via:

- Email to registered address
- Notice on websites
- Control panel announcement

Continued use of service after notice = acceptance of new policy.

Version: 1.0 Last Updated: 18th May 2026 Next Review: 31st December 2026

Approved by: CRISALEO LIMITED DPO & Compliance Team