

Guidance on data protection in the Complaints Board for Domain Names’ case management portal

1. General

This guidance concerns your responsibility for the processing of personal data, when you file a complaint to the Complaints Board for Domain Names or when you process personal data in the context of a pending case before the Complaints Board for Domain Names. In this regard, you must normally use the Complaints Board for Domain Names’ case management portal, which is available on the Complaints Board’s website www.domaeneklager.dk.

2. Your obligations as party or party representative in a case before the Complaints Board

You are the data controller

As party or party representative, you are the data controller for the personal data that you process in the course of the proceedings before the Complaints Board. This also applies to the personal data that you include in a complaint, in a reply or in exhibits that you submit to the Complaints Board.

What is personal data

Personal data is any form of information regarding an identified or identifiable natural person. Examples of personal data are information about a person’s name, address, phone number, date of birth, social security number, registered domain names and the use hereof. Further examples are information about a person’s occupation, education and hobbies.

Some personal data are of sensitive nature. This namely includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership as well as processing of genetic data, biometric data processed solely to identify a human being, health-related data or data concerning a natural person’s sex life or sexual orientation. This also applies to personal data relating to criminal convictions and offences or related security measures.

Personal data must be relevant for the processing of the case before the Complaints Board

You may only submit personal data to the Complaints Board that is relevant for the Complaints Board’s processing of the case. Therefore, you must omit personal data that is irrelevant to the case from the material that you submit to the Complaints Board.

Social security numbers are usually not relevant to the proceedings and therefore the last four digits of social security numbers should usually always be omitted from the material that you submit to the Complaints Board.

3. When the Complaints Board receives your case material

Once you have filed a complaint or returned a reply with possible exhibits in a pending case, the Complaints Board resumes responsibility for further processing of the personal data included in the case material. If the submitted case material contains personal data that the Complaints Board deems to be irrelevant to the case, the secretariat will request you to re-submit the case material with omission of the personal data concerned.

Please be aware that, as a general rule, all comments and exhibits that you submit to the Complaints Board in regards to a case will be shared with all parties and party representatives involved in the case. Your comments and exhibits will usually also be cited in the Complaints Board's decision in the case, which is published on the Complaints Board's website in accordance with specified rules. You can read more about this matter in the complaints Board's Privacy policy on the Complaints Board's website www.domaeneklager.dk (under "about this board", "rules").