1 Introductory provisions

A. The CZ.NIC Association operates and maintains the technical infrastructure of the domain name system (DNS) for the top-level domain .cz (ccTLD .cz) and operates the Central Register of Domain Names, that is a database of Domain Names, their Holders and other persons associated with the Domain Name. The data in the Central Register contains information about objects that are used in relation to Domain Names, in particular:

- Contact: a record of a specific person (natural or legal entity) who might have various roles in relation to the Domain Name, but primarily the role of Holder or Administrative contact;
- Registrar: an entity authorised under a contract with the CZ.NIC association to access the Central Register in a defined manner and to submit requests for changes to records kept in the Central Register; each object in the Central Register (Contact, Nameserver Set, Key Set) has exactly one Appointed Registrar.

B. The CZ.NIC association, guided by its interest in collecting and storing accurate and complete data on Domain Name registrations in the Central Register, defines these principles and procedures, the purpose of which is to define the basic requirements for the verification of registration data in accordance with legal regulations, in particular Directive (EU) 2022/2555 of the European Parliament and of the Council (NIS2 Directive) and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), and thus ensure the credibility, security and stability of the domain name system.

C. The principles defined in this document represent a framework that the CZ.NIC association considers appropriate, proportionate and compliant with legal regulations. The CZ.NIC association obliges Registrars to respect these principles and to apply them in the performance of their activities in a manner that ensures the accuracy and completeness of registration data.

D. The Registrar is entitled to supplement or amend its own contractual documentation in an appropriate manner so that Domain Name Holders are motivated to maintain the accuracy and completeness of registration data. This might include, for example, appropriate penalty provisions. The Registrar's contractual documentation shall not conflict with the Rules of Domain Names Registration under the ccTLD .cz, the Agreement on Cooperation in Domain Name Registration between the Registrar and

the CZ.NIC association, or legal regulations.

E. Terms used in this document with an initial capital letter have the meaning defined either directly in these principles and procedures, the Rules of Domain Names Registration under the ccTLD .cz, or the Rules of Provision of the MojeID Service to End Users. Unless the meaning is expressly stated, the terms used in this document shall be interpreted in accordance with their usual meaning in the context of Domain Name administration.

2 Principles for ensuring the accuracy and completeness of registration data

1. **Technological neutrality**: verification processes might be designed to allow for different technical approaches. Automated, manual or hybrid verification methods might be used, provided that the chosen procedure ensures the highest possible level of accuracy and completeness of data. The methods used must be transparent, auditable and in accordance with these principles and procedures.
2. **Proportionality and effectiveness**: verification procedures must be proportionate to the risk, with an emphasis on the security, stability and credibility of the domain name system. Domain Name Holders shall not be burdened with excessive or disproportionate requirements.
3. **Gradual implementation**: CZ.NIC and the Registrar might implement verification gradually, taking into account technical capabilities and operational stability. The availability of Domain Name registrations for end users shall not be negatively affected, but verification measures and new processes must be introduced in a timely manner and with demonstrable efforts to comply with these principles and procedures. Inaction or unjustified delay might be considered a breach of obligations under the Agreement on Cooperation in Domain Name Registration concluded between the Registrar and the CZ.NIC association.
4. **Risk-based verification**: verification procedures must be proportionate to the identified risk, while ensuring equal and non-discriminatory treatment of all Domain Holders. When assessing risk, factors such as history of abuse or violation of the Rules for the Registration of Domain Names in the ccTLD .cz or other similar document, type of registration and nature of the Domain Holder (legal entity – natural person, registered office, etc.) might be taken into account. Verification might take place before or after the delegation of the Domain Name.
5. **Hybrid verification model**: The Registrar and the CZ.NIC association cooperate in ensuring the accuracy and completeness of registration data. Verification is divided between the Registrar and the CZ.NIC association, with each entity responsible for verifying the assigned part of the data as follows:

a. CZ.NIC association: responsible for contacts listed in the MojeID identity registry, contacts, and other objects in the Central Registry for which the CZ.NIC association is the designated registrar;

b. Registrar: responsible for Contacts or other objects in the Central Register for which it is listed as the Appointed Registrar (for Contacts that were created with verification using the electronic identification service in accordance with legal regulations, which is different from the MojeID service, the Registrar is only responsible for data that can be modified through it; otherwise, the data accepted and verified through the relevant electronic identification service is trusted).

6. **Frequency of data verification**: both the CZ.NIC association and the Registrar verify registration data on an ongoing basis, particularly in response to internal evaluations and third-party suggestions. As an example of good practice, it is recommended to verify data, for example, when changing data, registering a new Domain Name, finding a discrepancy between the data recorded about the Domain Name Holder by the Appointed Registrar and that kept in the Central Register, and so on. The Registrar might choose a different verification frequency model, but in such a way as to ensure the highest possible compliance with these principles and procedures.

7. **Access to reliable sources**: the use of publicly available records of reliable sources (e.g. commercial register, VIES, etc.) is recommended.

8. **Electronic identification**: if an electronic identification service is available in accordance with the relevant legal regulations, its use is preferred as a method of verifying registration data. The use of an electronic identification service is a simple, secure and user-friendly method of verification that greatly facilitates data verification. The Domain Name Holder (the person to whom the Contact belongs) can verify their data quickly and conveniently without having to go through complicated verification procedures, submit paper documents, and the like. At the same time, this ensures the protection of personal data and interoperability across EU Member States.

9. **Transparency and auditability**: Both the Registrar and the CZ.NIC association keep records of the verification steps taken and are required to retain them for at least the duration of the contract between the Registrar and the Domain Holder and/or the Registrar and the CZ.NIC association, and for a further 5 years after its termination, unless a longer period is specified by law. The Registrar is obliged, at the request of the CZ.NIC association or the relevant supervisory authority, to document how and when the verification of registration data was performed.

10. **Personal data protection**: the processing of registration data that constitutes personal data must be carried out in accordance with personal data protection legislation. The period for which personal data is processed by the CZ.NIC association is set out in the Privacy Policy; in the case of the Registrar, it is

set out in a similar document issued by the Registrar.

3 Procedure for verifying Contact details in the Central Register by CZ.NIC

The CZ.NIC Association proceeds in the manner described below, especially in cases where it has doubts about the correctness of the data provided for a specific Contact, i.e. in particular in cases where there is a suspicion that the data recorded in the Central Register in connection with the Domain Name is false, inaccurate, incomplete or misleading.

As part of its control activities (based on internal control processes or external initiatives), the CZ.NIC Association continuously checks the data of Contacts; if a data check is initiated for a specific Contact (see below for the most common reasons), **a Request for Data Verification** ("Request") is **sent** to them.

The Contact is invited to log in to **the Verification Portal, where they can choose the method by which they wish to verify their data** (e.g. by sending a letter, using the MojeID service). The Verification Portal is user-friendly and guides the Contact through the necessary steps and informs them of the status of the verification.

A message about the Request and further steps taken by CZ.NIC as part of the verification process is always sent to the Contact who is listed as the Administrative contact for the Domain Names for which the Contact whose data is being verified is listed as the Holder. However, this Administrative contact cannot log into the Verification Portal instead of the Contact being verified and verify the data on their behalf.

The request and other notifications sent during the verification process always contain information on where the data can be verified and for which Domain Names the Contact is listed as the Holder.

The Contact whose data is being verified is informed about its status during the verification process (successful verification, data comparison result, verification completion). All communication about the verification process is sent to the email address listed in the Central Register for the relevant Contact.

Basic information sent to the Contact during the verification process

Information sent	Method of sending
• **Request** • **Reminder of the Request, notification of imminent cancellation of delegation of Domain Names for which the Contact is the Holder** • **Notification of cancellation of delegation of domain names for which the Contact is listed as the Holder** • **Final reminder of the Request, notification of impending cancellation of registration of Domain Names for which the Contact is listed as the Holder**	E-mail address listed for the Contact in the Central Register

The verification of Contact details usually takes no longer than 45 days, with the specific time depending, for example, on the verification method chosen by the Contact. The cancellation of a Domain Name registration is preceded by its removal from the zone (cancellation of delegation), which usually takes about a month.
The Contact and the Administrative contact of the Domain Names concerned are informed of all steps well in advance. They can check the verification status at any time in the Verification Portal or contact CZ.NIC customer support.
We are aware that the cancellation of a Domain Name registration is a serious interference with the rights of the Holder. The CZ.NIC association makes every effort to ensure that the Contact has a real opportunity to verify their data. The CZ.NIC association might extend the deadline for the Contact to verify their data.

4 What may be the reason for verifying Contact details in the Central Register

During the checks carried out, the following facts most often lead to the initiation of data verification:

- False, incomplete or misleading first and last name of a natural person (e.g. Jan N., Nováková, Neřeknu), use of only a pseudonym (e.g. Superhero), abbreviations (initials) of first and last names,

diminutives, nicknames, clearly non-existent first and last names (e.g. Dr. House);

- False, incomplete, misleading name of a legal entity, non-existent entity according to publicly available records (e.g. defunct entity), inaccurately stated name of a legal entity that allows confusion with another entity;
- Incorrect ID number/VAT number/identification data (e.g. date of birth 1 January 1900, VAT number CZ00000000, ID number and VAT number belonging to different entities);
- False, incomplete, inaccurate or misleading address (e.g. Street 1, City, Postcode; Prague) non-existent address according to publicly available records, address does not match the information in publicly available records.
- Initiative of a public authority or court.

The above list is not exhaustive.

5 Why is contact information checked and how is the check performed?

Applicants for registration/Domain Name Holders are required, in accordance with the Rules for the Registration of Domain Names in the ccTLD .cz ("Rules"), to provide information in accordance with the Rules. The Rules define which data is mandatory, but if other data is provided that is not mandatory, the requirement for accuracy also applies to that data. If the Contact is used in the MojeID service, the scope of data is also defined by the Rules of Provision of the MojeID Service to End Users. The person submitting an application for registration of a Domain Name or Contact or an application for a change in data relating to a Domain Name or Contact is responsible for the accuracy of all data provided in the registration application relating to the persons specified in the application and is obliged to notify any changes to this data without undue delay through the Designated Registrar.

The Holder is also liable for any damage caused to the CZ.NIC association by providing false, incomplete or misleading information.

It is also the Holder who may be liable for the use or non-use of the Domain Name and for the infringement of trademark rights, trade names and other rights and legally protected interests of third parties.

The verification of the Holder data (or Contact data as such) is essentially carried out in two ways – **automatically**, where the system evaluates the accuracy of the data entered in the Central Register in accordance with the set parameters (e.g. public administration information systems, factual verification of the

entry of certain data, number of characters of certain data, if standardised, e.g. ID number, VAT number, etc.) **and manually** (external stimuli, periodic checks carried out as part of customer support department activities, etc.).

These methods of data verification also include updating and verifying data in connection with the use of the MojeID service and the level of verification of its users' data (validation – including electronic identification).

6 Reasons for the unambiguous identification of the Domain Name Holder

The necessity of unambiguous identification of the Contact, who is listed as the Domain Name Holder, has three main aspects:

- From the perspective of the Holder: identification of the Holder as a party to the legal relationship that arises between the CZ.NIC association and the applicant for registration/Domain Name Holder, for the purpose of proving that the records kept in the Central Register correspond to a real person and that this person is able to prove, if necessary, that they are the person whose data is kept in the Central Register.
- The perspective of the CZ.NIC association: identification of the Holder as a participant in the legal relationship that arises between the CZ.NIC association and the applicant for registration/Domain Name Holder through the Appointed Registrar; the responsibility of the CZ.NIC association as a personal data controller under specific legal regulations, the obligations of the CZ.NIC association in ensuring a high level of cyber security and ensuring the security, stability and resilience of the domain name system, and the fulfilment of other obligations in the area of cyber security in accordance with legal regulations.
- Perspective of the Appointed Registrar: identification of the Holder as a party to the legal relationship that arises between the Appointed Registrar and the applicant for registration/Domain Name Holder through the Appointed Registrar, or through other actions on the basis of which rights and obligations arise between the Appointed Registrar and the applicant for registration/Holder; Responsibility of the Appointed Registrar as the controller and processor of personal data in accordance with specific legal regulations; obligations of the Appointed Registrar association in ensuring a high level of cyber security and ensuring the security, stability and resilience of the domain name system and fulfilling other obligations in the area of cyber security in accordance with legal regulations.
- Third-party perspective: identification of the Holder as a subject of a legal relationship with third parties

(e.g. in terms of the exercise of rights and legally protected interests of third parties vis-à-vis the Holder).

7 Protection of the Domain Name Holders against vexatious complaints

The purpose of the above procedure is to contribute to the accuracy of the data of Contacts - Domain Name Holders, which are kept in the Central Register. If the CZ.NIC association receives a notification of incorrect Contact data, but a subsequent check does not reveal any obvious discrepancy between the data and reality (e.g. the address exists according to publicly available records, but it is not possible to verify the residence of a natural person at this address), it is entitled to request additional documents proving the good faith or genuine legal interest of the notifier (e.g. a scan/copy of the envelope proving that the Contact attempted to contact the address listed in the Central Register in writing, but the shipment could not be delivered; a shipment that the addressee refused to accept or did not collect during the storage period cannot be considered undeliverable).

The following **shall not constitute** grounds for initiating the above process or for cancelling the registration:

- The absence or inaccuracy (incompleteness) of any of the information that is not mandatory under the Rules, unless this results in the Contact's information as a whole being misleading (e.g. the ID number and VAT number belong to different entities, inconsistency with the Organisation item, etc.).
- The Holder's silence in response to suggestions, requests or documents sent to them by third parties by post, e-mail or failure to answer telephone calls and the like, even though they have been delivered, or refusal to accept them or failure to collect them within the storage period (The Holder is not obliged to respond to such requests; this does not, of course, affect the imposition of sanctions if he fails to respond to documents sent by public authorities).

8 Other cases

In cases where the Holder fails to provide additional identification data pursuant to Article 12.5, a valid delivery address in the EU/EEA, or fails to indicate the details of a representative with a valid delivery address in the EU/EEA, the procedure shall be similar. In this case, too, the Contact shall provide the details of a representative with a valid delivery address in the EU/EEA or details of a delivery address in the EU/EEA via

the Verification Portal, as described above.

In other cases, e.g. when verifying whether the Holder has ceased to exist without a legal successor or has died without heirs, the procedure is similar.