

.hr Domain Management Committee, composing of Barbara Kolarek, prof. Gordan Gledec PhD, Marko Jurić PhD, Matija Nalis and Krunoslav Tušek at the meeting held on March 2nd 2021 in accordance with Article 4, Item 1 of the Ordinance on the Organization and Management of the Top-level National Internet Domain, has brought the following:

Interpretation of Article 4 of the Domain Registration Transfer Agreement

The obligation of the Registrar as part of the registration and administration of secondary and tertiary .hr domains is to keep all logs of carried out transactions, i.e. changes in domains, as well as all logs when renewing domains. This interpretation further clarifies the scope of the logs to be collected.

Grounds for the decision

Article 4 of the Agreement with Registrars on the transfer of domain registration activities, as part of the conditions for performing domain registration activities, stipulates, inter alia:

- that registrars should keep logs of all transactions carried out for a minimum of five years, even in the event of termination of the contract, and
- that registrars should inform CARNET where and how transaction logs are stored and, in the event of termination of the contract, deposit the logs of all carried out transactions at CARNET.

In doing so, the term *transactions* means all changes that have been carried out for a specific domain, such as changing users, renewing registration, deleting a domain, etc.

In addition to the aforementioned provisions of the Agreement, when signing the Agreement on the transfer of domain registration activities, Registrars should also submit CARNET a Statement on the storage of transaction logs confirming that they carry out all transactions at the sole request of the user and indicate the ways in which they receive user requests, as well as the ways and time intervals for backing up data with information on the location of the request and data storage (server and database).

With this interpretation, the .hr Domain Management Committee further clarified the scope of logs to be collected and stored by Registrars; it concerns the following data sets when receiving user requests and registrar activities according to the .hr Domain Registry:

- 1) Logs collected when receiving user requests for registration and changes on a specific domain:
 - a. Domain name

- b. Domain user data (OIB (Personal / Company Identification Number), first name and last name of the user, name of the legal entity, e-mail address)
- c. Date and time of receipt of the request
- d. Type and details of the request (registration for a certain number of years, change of user specifying the old and new user, deletion, etc.)
- e. Method of receiving requests (via the user interface of the Registrar, by e-mail, telephone, etc.)
- f. Data on the applicant depending on the method of authorization (first name and last name, IP address, phone number, e-mail, etc.)

2) Logs and activities of the Registrar in domain administration

- a. Domain name
- b. Data on the registrar (username of the employee of the registrar who performed the activity)
- c. Date and time of activity
- d. Type of activity (registration, extension, transfer, etc.)
- e. Method of connection to the .hr Domain Registry system (web application or Electronic Application System (EPP))
- f. In the case of using the Electronic Application System (EPP), the time of activity must be precise (hours, minutes, seconds and time zone) and a record of the successful action within the system must be recorded.

Within the application for managing the Registry of .hr domains, CARNET has a history for all domains in terms of certain changes to domains by the Registrar, but in case of need for additional data, the Registrar should also have concrete evidence on the basis of which the change was made. Stated additional evidence is required in the case of litigation, orders of the Ministry of the Interior, arbitration disputes and similar.

Besides the continuous and systematic collection of domain logs, the correctness of the data on the domains contained in the aforementioned application for managing the .hr Domain Registry is extremely important, and only the changes made through this system can be considered credible. If any of the authorized registrars uses their own or another system for their business and domain administration, they are obliged to ensure that this system is compliant with the Registry.

prof. Gordan Gledec, PhD
President of the
.hr Domain Management Committee
[digitally signed]