2025

Data and Document Retention Policy

This policy details personal data retention at .IE.



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Public

Document Control

Version	Date	Nature of Update
V.1	25 May 2018	Baseline
V.2	16 November 2020	Updated Text
V.3	11 December 2023	Minor Text Updates.
V4	15 December 2025	Annual Review

.ie Data and Document Retention Policy

(Extract pertaining to .ie domain registration and domain management retention)

Valid from 15 September 2025

1. Definitions

Contacts

Registrant Contact - this is the party granted the right to use a .ie domain by the IE Domain Registry, having provided evidence of its connection to Ireland and commercial/personal identity (as required). Contact information provided within the Registrant Contact role must strictly relate to the Registrant, and not any third party. The Registrant Contact has full authority over the registration, and shares this responsibility with its nominated Administrative Contact.

Administrative Contact - this party represents the registrant rather than the Sponsoring Registrar or any other Service Provider, and must have the authority to act for the Registrant. This person is the primary point of contact for automated emails relating to the registration of the .ie domain, and can request registration related changes with the Sponsoring Registrar.

Technical Contact - this role can be filled by anyone chosen by the Registrant or Administrative Contacts. The Technical Contact is the point of contact for notifications relating to the technical aspects of the domain registration, including hosts, domain locking and DNSSEC.

Billing Contact - this role can be filled by anyone chosen by the Registrant or Administrative Contacts. The Billing Contact is the point of contact for notifications from the Sponsoring Registrar and Registry relating to the financial aspects of the domain registration, such as payment of registration and renewal fees.

Data Controller means the person, company or other body which determines the purposes and methods of processing personal data;

Hosts (also known as nameservers) are used to host a website. For example, the hosting records for weare.ie include ns1.weare.ie and a.ns.ie. Registrants should provide a minimum of two hosts with each request for registration, and these must be configured in accordance with Industry Best Practices set out in RFC protocols 1034 and 1035, and with authoritative zones to host the domain in question;

Personal Data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person;

Register is the .ie database of domain names and which also incorporates details about Domain Contacts (including the Registrant Contact) and technical information, such as host records, in addition to any other information the Registry needs;

Registrant is the party granted the right to use the .ie domain by the IE Domain Registry, having provided evidence of its connection to Ireland or commercial/personal identity, and agreed to adhere to the Registrant Terms and Conditions. It is also a defined Contact role within the .ie database, and must provide full contact information at the time of application. Furthermore, the Registrant is required to keep all domain contact information up-to-date for the lifetime of the domain registration.

Registrar is the accredited Registrar nominated by the Registrant to be the entity responsible for the payment of registration and renewal fees, in addition to the management of the .ie domain registration. In the Registry's technical systems, the accredited .ie Registrar nominated by the Registrant is referred to as a "Sponsoring Registrar".

Registry means IE Domain Registry CLG, trading as .ie, which manages and operates the .ie namespace

Rules means all rules and regulations applicable to the .ie Top Level Domain, including without limitation those within the Registration and Naming Policy, the WHOIS Services Policy, the Data and Document Retention Policy, the IE Dispute Resolution Policy, the Alternative Dispute Resolution Policy (all as published, amongst others, on the Site), and the Registrant Terms and Conditions

Site means the websites operated by IE Domain Registry CLG, trading as .ie, including www.weare.ie, amongst others;

System means the hardware and software used by the Registry to provide the Services;

Us or us or We or we means the Registry;

2. Policy Statement

The Data Protection Act 2018 (as amended), (the DPA), and from the 25 May 2018, the General Data Protection Regulation (the GDPR), impose obligations on us, as a Data Controller to:

- process personal data in a fair manner and to notify data subjects of the purposes of data processing and
- to retain the data for no longer than is necessary to achieve those purposes.

In this policy, the Registry's retention practices are detailed, along with the rationale for the retention periods.

Retention Summary

Personal Data for Domain Contacts

- If associated with a successful domain registration(s) request, this data is kept for the lifetime of the contact being used in a contact role for any .ie domain, plus two years after the contact person is no longer linked to any .ie domain.

- If associated with an unsuccessful request, this is retained for 7 days after failure.

Documents containing Personal Data for Domain Contacts

- If associated with a successful domain registration(s) request, this is retained for 30 days after request completion.
- If associated with an unsuccessful request, this is deleted within 7 days after failure.

Non-Personal Data

- Records and documents that do not contain Personal Data may be retained in accordance with business practice.

3. Data Retention

Personal Data for .ie Domain Contacts

The Registry retains the Personal Data of .ie Registrants and Domain Contacts for the period of the contract, i.e. lifetime of the domain registration, plus a further 2 year period after deletion. However, if a Contact person is replaced or removed from the registration before the domain is deleted, then it's Personal Data will be anonymised 2 years from the date it stopped acting as a Contact person for any .ie domain.

Note: This 2 year retention period after contact removal relates to the potential need for the Registry to defend its rights should legal action be launched for breach of contract. (The Statute of Limitations is 6 years for a civil action to be taken for breach of contract).

Non-Personal Data records

The Registry retains non-Personal Data records associated with deleted domain records indefinitely.

Personal Data in failed new registration or transfer requests

If a request to register, modify or transfer a .ie domain name registration fails to complete, the new Personal Data contained within that request is deleted within 7 days after the request fails.

4. Document Retention

Documentation containing Personal Data for .ie Registrants and Domain Contacts

In accordance with the principles of data minimisation and purpose limitation, the Registry retains documentation containing the Personal Data of .ie Domain Contacts **for a maximum period of 30 days** from the date on which the related request completes[1]. This documentation is typically provided to the Registry in support of domain

[1] For the avoidance of doubt, a completed request is one that has passed the registry's internal administrative, financial checks, thereby creating a contract between the registry and the Registrant.

registration, Domain Contact updates, and registrant transfer requests, in accordance with the Rules of the namespace.

Documentation containing Non-Personal Data records

Documentation containing non-Personal Data records may be retained indefinitely.

Documentation containing Personal Data in failed registration or transfer requests

If a request fails to complete, the documentation containing new Personal Data is deleted within 7 days after the request fails.

5. Rationales for Data and Document Retention

Data Retention Rationale

- The Registry is responsible for managing the .ie namespace, which it does under a "Managed Registry" model. This means that anyone applying to register a .ie domain name must show compliance with the Rules of the .ie namespace. These Rules include the requirement for a future registrant to provide evidence of their real connection to the island of Ireland.
- When registering a .ie domain name, a contract, known as the Registrant Terms and Conditions, is established between the Registrant, and the Registry. Every accredited Registrar also has a contractual relationship with the Registry via the Registrar Agreement.
- The contract between the Registrant and the Registry forms the legal basis for the Registry's processing of Personal Data related to .ie domain requests.
- The Registry only keeps personal data relevant to this contract for as long as is strictly necessary.
- The Registry may require reliance on personal data related to the domain contract, in the event of a need to defend the Registry should a legal challenge arise. The registry completed an extensive assessment of the proportionate timeframe in which a legal dispute might arise, and concluded that retention of such data for a 2-year period after contact removal was necessary[2].

  Therefore, when a contact is no longer associated with any .ie domain registration, and by extension a domain contract, we delete this personal data 2-years after the contact's removal.
- Similarly, when the contract with the Registrant lapses, i.e. when the domain registration deletes or is transferred to a new Registrant, the Registry retains personal data of the last active domain contacts for a further 2 year period from

[2] Although the statute of limitations is 6 years, on review the registry acknowledged that any legal action would likely arise in the first year after contact removal or domain deletion, with a further year required for such action to be resolved by the Courts. This is the rationale for the retention outlined within this Policy.

the contract conclusion, for defence of its rights in any future legal action for Breach of Contract.

Document Retention Rationale

- The Registry is responsible for managing the .ie namespace, which it does under a "Managed Registry" model.
- When registering a .ie domain name, a contract is established.
- This contract forms the legal basis for the Registry's processing of Personal Data related to .ie domain names during the lifetime of that registration. [Provision of evidence demonstrating the Registrant's compliance with the Registration and Naming Policy is one of the requirements to be met in order for the contract to be established].
- When the contract has been established, specifically when the domain registration completes, the Registry retains supporting documentation containing Personal Data for a maximum period of 30 days thereafter. This is done to allow for internal quality control checks to be undertaken. Similarly, when a .ie domain transfer request is received, related documentation containing Personal Data is retained for a maximum period of 30 days to allow for these internal quality control checks.
- The Registry may rely on the related Personal Data for the defence of its legal rights in any future legal action for Breach of Contract.

6. Storage

The Registry is responsible for ensuring that records containing the Personal Data of .ie Registrants and Domain Contacts are stored in a safe, secure and accessible manner. This data is stored in the Republic of Ireland, is protected to industry standards and is fully encrypted.

7. Destruction

The Registry is responsible for the continuing process of identifying the Personal Data records that have met their required retention period, and destroying this Personal Data, in accordance with the practices outlined in this Policy and the Rules of the namespace.

The physical destruction of Personal Data contained will be conducted by shredding.

The destruction of Personal Data contained within electronic records is coordinated by the Registry's Senior Management Team and the Registry's Technical Services Department.

Where a legal complaint arises, the destruction of records will be ceased immediately upon notification of this action. Destruction of the related records will be arranged once the Registry receives satisfactory notification that the proceedings have been withdrawn or concluded.