

**MANDATORY DATA TRANSFER INFORMATION: .VIN**

Registry corporate name	Holly Shadow, LLC
Registered Office	c/o Donuts Inc. 10500 NE 8th Street Suite 350, Bellevue Washington 98004, United States
Type of data collected by Registrar	<p>1. WHOIS data collected at registration consisting of: (i) registered name holder, email, postal address, telephone number and fax number (if applicable) (ii) technical contact name, email, postal address, telephone number and fax number (if applicable) (iii) admin contact name email, postal address, telephone number and fax number (if applicable)</p> <p>2. Transactional data relating to every instruction and/or interaction relating to a domain name registration and to provide such information to Naming Authorities. Such data shall include, but shall not be limited to, written communications, confirmations, modifications and any other related correspondence, payment source information, log files, billing records and any other communications information such as source IP address, HTTP headers, telephone, text or fax numbers, email address or instant messaging identifier, and other records concerning registration such as dates, times, zones and sessions.</p>
Frequency of data transferred	<p>1. WHOIS data transferred to Registry at registration, renewal and any other change in WHOIS data (e.g. registered name holder address change).</p> <p>2. Transactional data transferred to Registry and/or ICANN on request, such as compliance question or contract audit. No regular data transfer.</p> <p>3. WHOIS data escrowed to Escrow Agent daily and weekly.</p>
Data sent outside EEA?	YES to Registry Operator, ICANN and Escrow Agent
Reason for data transfer	Mandatory contract fulfilment to register, renew and manage the registered domain name.
Data Escrow	<p>YES</p> <p>WHOIS data escrowed to Escrow Agent as follows:</p> <p>(i) domain name registration information sent at 0700UTC the day after a domain name is registered (including renewals);</p> <p>(ii) export of all information relating to domain names under management on a weekly basis. Escrowed data is not accessed by Escrow Agent and can only be accessed by ICANN in specific circumstances.</p>
Escrow Agent	Iron Mountain Intellectual Property Management, Inc
Escrow Agent registered office	Iron Mountain Intellectual Property Management, Inc. One Federal Street Boston, MA 02110, USA
Contractual framework for personal data transfers	<p>2013 ICANN Registrar Accreditation Agreement applicable between ICANN and domain name registrars.</p> <p><a href="https://www.icann.org/resources/agreement/vin-2015-06-18-en">https://www.icann.org/resources/agreement/vin-2015-06-18-en</a></p> <p>Registry Registrar Agreement version 22 Dec 2014 Registry Agreement between ICANN and Registry dated 22 Dec 2014</p>