

Zwolle 11-10-2017

To Whom It May Concern:

With this letter of intent, Realtime Register B.V. expresses a strong interest in selecting DENIC eG as a Designated Escrow Agent (DEA) and fully supports DENIC's application.

Realtime Register has been active in the web hosting and domain name industry for more than ten years and has been ICANN accredited since 2004. We serve over 250,000 clients and resellers and have registered more than 2 million domain names. We offer a full range of premium products ranging from domain name registration, various hosting products, site builder tools, SSL certificates and more.

With a team of 200 online professionals, we are fully committed to help the online business of our clients grow. We are active in over 80 countries and have offices in the Netherlands, India, and Russia. We stand for easy to use and reliable business automation of domain names, combined with a wide range of first-class hosting products and support, as essential elements of successful online business for our clients.

Since March 2004, we have been an accredited DENIC member and part of the Cooperative. We attest that DENIC is neutral, impartial, independent, informed, responsible and non-discriminating. Additionally, we conform with the internationally recognized standards for running a domain registry as well as an escrow service. Providing Escrow DENIC's close cooperation with its registrars and members will be further maintained as it continues to strive to fulfill its duties towards the global internet community. Thanks to its expertise, DENIC has gained trust and respect not only in Germany, but also internationally.

We use the paid Escrow service from DENIC. Reliability, legal certainty, technical expertise, and trust are essential factors for a good collaboration and are critical for us. These stated factors are the guiding principles for having chosen Denic as our provider. The pricing structure is also of great importance. Therefore, we will switch immediately if DENIC is awarded as DEA and all legal framework, including European data protection regulations, are in place.

We advocate and strongly support DENIC's application, specifically in the interest of legal certainty

for European registrars in the context of GDPR and will immediately choose DENIC as a DEA upon approval as DEA by ICANN.

Realtime Register B.V. urges ICANN to handle the matter swiftly.

The Irish High Court Decision regarding Facebook (Oct 3) indicates that the so-called SCC maybe invalid. This would directly impact European Registrars who have an SCC in place with Iron Mountain if the CJEU would indeed rule that the SCC would be invalid and most likely Privacy Shield would be invalidated again.

Best regards,

A handwritten signature in black ink that reads "Theo Geurts". The script is cursive and fluid.

Theo Geurts

Compliance & Policy Officer | Realtime Register B.V.

Ceintuurbaan 32A

8024 AA - ZWOLLE - The Netherlands

T: +31.384530759

F: +31.384524734

U: www.realtimeregister.com

E: legal@realtimeregister.com

Skype: [geurts.theo](https://www.skype.com/people/geurts.theo)