Legal Requests & Government Authority Submission Policy

1. Purpose and Scope

This policy describes how Atak Domain Bilgi Teknolojileri A.Ş. (“Atak Domain”, “we”) responds to legal requests submitted by official authorities, law enforcement agencies, courts, and authorized administrative bodies.

This policy applies to all services provided by Atak Domain, including:

- domain name registration records
- DNS services
- hosting, e-mail, SSL, proxy/privacy services
- log, traffic, and security records

This policy is applicable only for valid, lawful, and verifiable requests submitted by authorized entities.

2. Principles and Commitments

Atak Domain adheres to the following core principles:

1. **Protection of user privacy**
   No data is shared with third parties or authorities unless legally required.
2. **Full compliance with legal procedures**
   All actions comply with Turkish law, ICANN policies, GDPR, KVKK, and relevant international frameworks.
3. **Transparency and accountability**
   All legal requests are recorded, verified, and evaluated by the relevant departments.
4. **Data minimization**
   Only the minimum amount of data required to satisfy the request is shared.

3. Types of Requests from Authorized Authorities

Authorized authorities may request the following:

3.1. Information Requests

- domain registrant information
- billing records
- contact information
- DNS and technical records
- service usage information

Requests are evaluated under KVKK and applicable laws.

3.2. Traffic and Access Log Requests

These can only be shared with:

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• a court order,
• a judge's ruling, or
• a formal prosecutor's instruction.
Atak Domain's log retention periods are determined by the Data Retention & Logging Policy.

3.3. Access Blocking Orders
URL/IP/domain-based access blocking decisions issued by courts will be implemented.

3.4. Domain Suspension, Locking, or Transfer
May be enforced under:
• BTK/Police/Prosecutor decisions
• ICANN UDRP / URS rulings
• illegal content
• phishing, malware, botnet activity

4. Who Is Authorized to Submit Requests? (Authority Verification)
Only the following institutions' requests are processed:
• Public Prosecutor's Offices
• Criminal Judgeships of Peace
• Courts of Law
• BTK and related regulatory bodies
• Law Enforcement Cybercrime Units
• Gendarmerie Cyber Units
• MASAK (in applicable cases)
• International authorities (ONLY via lawful judicial cooperation through Türkiye)
Each request is validated through official document verification and signature authentication.
For requests sent via e-mail, verification of the official corporate address is mandatory.

5. Submission Channels for Government Authorities

5.1. Official Letters and Notifications
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5.2. E-mail
• hukuk@atakdomain.com
• domain@apiname.com
(Official sender address verification is required.)

5.3. UETS / KEP (if applicable)
Atak Domain will announce its KEP address when available.

6. Processing Workflow

Each request is handled through the following steps:

1. Authority verification
2. Scope analysis
3. Legal validity assessment
4. Preparation based on the data minimization principle
5. Sharing and logging
6. Customer notification (unless prohibited)

7. Customer Notification

As a general rule, when a request concerning a customer is received, the customer is notified.

However, notification is NOT made if:

• a confidentiality order exists from the Prosecutor's Office
• the request relates to an active criminal investigation
• national security, public safety, or urgent threats are involved

In such cases, customer notification is legally prohibited.

8. International Requests

Requests from institutions outside Türkiye are not directly enforceable.

A foreign request becomes valid ONLY if:

• submitted through international judicial cooperation, and
• approved by the relevant Turkish authorities.

9. Emergency Requests

For critical and urgent matters (e.g., active cyberattacks, child exploitation, human trafficking, terrorism-related content), Atak Domain:

• promptly informs relevant authorities, and
• immediately applies necessary technical measures

(suspend, freeze, takedown).

This process complies with ICANN, IWF, INHOPE, and global security networks.

10. What Data May Be Shared?

Depending on the type of request, the following may be shared:

10.1. Publicly Available WHOIS Data

• domain name
• registration/renewal/expiration details
• nameservers

10.2. Customer Information (Only with Legal Requirement)

- name / surname / company name
- address, phone
- billing and payment information
- IP logs (with court order)
- access / transaction logs (with court order)

10.3. Data That Will Never Be Shared

The following categories are never shared under any circumstance:

- customer passwords
- SSL private keys
- DNSSEC KSK/DS private keys
- e-mail contents
- hosting files (unless a court order explicitly requires it)

11. Difference Between This Policy and Abuse Reports

This policy applies **only to government authorities and courts**.
Abuse reports are submitted by:

- individuals
- companies
- trademark owners
- security researchers

and follow a separate procedure (Abuse Policy).

12. Logging of Requests

For each request, Atak Domain records:

- request ID
- requesting authority
- date and time
- processing steps
- the data set shared

These records are retained for at least 3 years.

13. Actions in Case of Confirmed Abuse

If unlawful activity is confirmed through the legal process, services may be suspended.
This includes:

- phishing, malware, botnet activity
- illegal content
- fraud, forgery
- urgent intervention orders by authorities
- court decisions

Atak Domain may:

- deactivate the domain
- disable DNS
- apply registrar lock

14. Right to Amend

Atak Domain reserves the right to update this policy in accordance with:

- new legal regulations
- ICANN / registry requirements
- national security needs

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