



## Privacy Policy Evaluation

Domain Name Renewal Study

Date

31 July 2025

Classification

Public

Author

Privacy Board

Page

1/4

**SIDN BV**

**Contact**

T +31 26 352 5500

support@sidn.nl

www.sidn.nl

**Office**

Meander 501

6825 MD Arnhem

The Netherlands

**Mailing address**

Postbus 5022

6802 EA Arnhem

The Netherlands

**Trade Register**

Arnhem 88 77 28 96

### Policy

Title of policy Domain Name Renewal Study

Policy start date 25 July 2025

Date of evaluation 31 July 2025

### Purpose limitation

GDPR applicable? Will any personal data be processed? Will personal data be processed on an automated or semi-automated basis, or will personal data contained in a file be processed manually?

☒ Yes ☐ No

*The study will involve the automated processing of personal data. The personal data in question will come from internal and external sources.*

*Internal sources:*

- DRS
- DMAP
- ENTRADA
- CRM
- Marketing data



Date  
31 July 2025

Classification  
Public

Page  
2/4

*External sources:*

- StatLine (a Statistics Netherlands databank)
- Google Chrome's CrUX (popularity index)
- Common Crawl (an open repository of web crawl data)
- OpenINTEL

*Data from the external sources will be processed exclusively within SIDN; we will download the datasets and then match the data on our own systems with the domain names involved in the study.*

**Object**

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

- ☒ Yes  
☐ No, insofar as

*The purpose of the study is to provide insight into the circumstances under which domain name registrations are and are not renewed, to facilitate forecasting of .nl domain name numbers. The purpose is specific and explicitly defined.*

**Legitimate basis**

The evaluation must address the proportionality and subsidiarity of the processing (i.e. whether the interest served by processing is important enough to justify any resulting loss of privacy, and whether the purpose could be served by any other, less intrusive means).

Is the legitimate basis clear?

- ☒ Yes  
☐ No

*The legitimate basis for the data processing is SIDN's reasonable interest in obtaining insight into the circumstances under which domain name registrations are and are not renewed. Neither the study findings nor the research activities are specifically focused on personal data. The data subjects do not have an interest in the data not being processed that outweighs SIDN's reasonable interest. The data subjects will not be disadvantaged by the processing of their personal data. The processing of the personal data in question is necessary for the performance of the study. The Privacy Board considers that the project satisfies the relevant proportionality and subsidiarity requirements.*



Date  
31 July 2025

Classification  
Public

Page  
3/4

## Safeguards and control measures

### Purpose limitation

Are there adequate safeguards to ensure that personal data is not used for purposes other than that for which it was obtained?

- ☒ Yes  
☐ No

*The data will be available only to the researchers working on the project. Access to the data will be controlled using the SIDN data platform.*

*The SIDN data platform has its own privacy policy. Under that policy, data is accessible only by authorised users working in a secure environment, by means of a username-password combination and a second authentication factor.*

### Retention period

Is personal data retained for any longer than necessary for the defined purpose?

- ☐ Yes, data is retained for longer than necessary; corrective measures required.  
☒ No

*The data will come from various SIDN sources and external sources. The retention periods defined for each individual source will be respected, subject to a maximum retention period of 5 years.*

### Data set limitation

Is the entire data set necessary for the defined purpose, or could a more limited data set be used?

- ☒ Yes  
☐ No; corrective measures required.

*The Privacy Board considers that the data set used is the minimum required for the fulfilment of the defined purpose of the processing. The research requires the use of a complete data set.*

### Data reliability

What is done to ensure that the gathered data is accurate and up to date?

*The data will come from various SIDN sources and external sources. The external sources are respected sources frequently used for academic research purposes. All sources contain measured data that we trust, obtained using known test methods.*

### Data processors

Who processes the data? Who else has access to the data?

*The researchers working on the project.*

### Data security

How is the data protected against loss and unauthorised processing?



Date  
31 July 2025

Classification  
Public

Page  
4/4

*The data will be saved in a secure database. The data will be accessible only by authorised users working in a secure environment, by means of a username-password combination and a second authentication factor.*

## Other

Special personal data Is any special personal data processed?

- ☐ Yes  
☒ No

*No special personal data will be processed.*

Notification of Data Protection Officer Has the Data Protection Officer been notified in connection with inclusion in the Processing Register?

- ☒ Yes  
☐ No

The processing is to be recorded if any significant new processing is involved.

Subjects' rights If the personal data is not obtained from the subjects, but by other means, is the origin recorded?

- ☒ Yes  
☐ No

*The data will come from various SIDN sources and external sources.*

Retention within EU Is any data transferred to a country outside the EU?

- ☐ Yes  
☒ No

*The research findings will be shared with multiple CENTR-affiliated registries, some of which may be outside the EU. However, the research findings will not include personal data.*

## Conclusion

Evaluation What is the conclusion of the Privacy Board's evaluation?

*The Privacy Board approves the Privacy Policy for the project.*