



## Privacy Policy Evaluation

Registration Checker (RegCheck)

Date

06 January 2022

Classification

Public

Author

Privacy Board

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### Policy

Title of policy Registration Checker (RegCheck)

Policy start date 12 January 2022

Date of evaluation 06 January 2022

### 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

Why?

*The Privacy Board considers that the project will involve the processing of personal data. In order to identify suspect registrations, registration data (registrant and admin-c details) on all registered domains within the .nl domain will be processed. The data items to be processed are name, e-mail address, phone number, postcode, street, property number and country. The processed data will include information about identified or identifiable natural persons. The data is to be shared with Support, who will assist the study by annotating the identifications made using the two methods.*

*Automated processing of personal data is also to be carried out. Hence, the GDPR may be deemed applicable.*



## Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

- Yes  
 No, insofar as

*The aim of the pilot is to determine the best way of automatically identifying suspect domain name registrations. By increasing the probability of registrations with incorrect data being identified, the project will help to raise the quality of the data and will contribute to the security of the .nl zone. The suspect registrations targeted by RegCheck are registrations where the registrant has malicious intentions (e.g. phishing or setting up a fake webshop).*

*The Privacy Board considers that the privacy policy defines the purposes of the processing in specific and explicit terms. The Privacy Board also considers that the identification of suspect registrations where the registrant has malicious intentions constitutes a legitimate purpose, since processing serves a reasonable interest and therefore has a legitimate legal basis in the context of the GDPR. Moreover, the purpose is consistent with SIDN's mission and vision.*

## 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 reasonable interest. The Privacy Board considers that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. During the pilot, the data is required in order to create an effective system and will therefore help to raise the quality of the data and contribute to the security of the internet. The processing is necessary for furtherance of SIDN's reasonable interest. No special personal data will be processed. If a registration is identified as suspect, Support will decide whether to investigate further or, for example, initiate an Article 18 procedure. Registrant investigation is a manual process, in which the data subject/registrant has opportunity to demonstrate that the registrant data is correct.*

*The Privacy Board considers that the project satisfies the relevant proportionality and subsidiarity requirements. The associated privacy infringement is justified by the purpose.*



## 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 new registration data and classifications will be available only to suitably authorised SIDN Labs staff who are involved in the RegCheck pilot. The data will be saved in a secure database.*

*The Support Department will have access to the registration data referred to it on a daily basis. The registration data will be displayed on an online dashboard accessible only to Support and Labs personnel. The dashboard will be accessible only from the SIDN network, with access controlled by username-plus-password protection.*

*The Board nevertheless considers that, in order to realise an appropriate level of organisational security, it is desirable that access to the data is restricted to a very small number of people and is logged. It is also important that the personnel with access are properly instructed as to what may be done with the data.*

**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 personal data will be retained only for the duration of the pilot. The pilot will run until January 2023. The Privacy Board accordingly considers that the personal data will not be retained for any longer than necessary for the defined purpose. If RegCheck is not to be developed further, all the data gathered and processed in the context of the pilot will be destroyed. If RegCheck is to be developed further, the data retention policy will be re-evaluated, and a new policy will be requested.*

**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 to be used is the minimum required for the fulfilment of the defined purpose of the processing.*



**Data reliability**

What is done to ensure that the gathered data is accurate?

*The data comes from another source and will not be modified by the processing performed in the context of the research. The data will be extracted from the Domain Registration System (DRS).*

**Data processors**

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

*Suitably authorised SIDN Labs staff who are involved in the RegCheck pilot and the Support Department.*

**Data security**

How is the data protected against loss and unauthorised processing?

*The new registration data and classifications will be available only to suitably authorised SIDN Labs staff who are involved in the RegCheck pilot. The data will be saved in a secure database.*

*The Support Department will have access to the registration data referred to it on a daily basis. The registration data will be displayed on an online dashboard accessible only to Support and Labs personnel. The dashboard will be accessible only from the SIDN network, with access controlled by username-plus-password protection.*

**Other**

**Special personal data**

Is any special personal data processed?

- Yes
- No

**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 is to be obtained from the Domain Registration System (DRS).*



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## Retention within EU

Is any data transferred to a country outside the EU?

- Yes
- No

*No data is to be transferred to a country outside the EU.*

## Conclusion

### Evaluation

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

*The Privacy Board approves the Privacy Policy for the RegCheck project, subject to the condition that Support Team access is restricted to a very small number of people whose access is logged, and who are properly instructed as to what may be done with the data.*