



Privacy Policy Evaluation

Proactive recognition of domain abuse

Date
28 April 2020

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Public
Author
Privacy Board

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Policy

Title of policy	Proactive recognition of domain abuse
Policy start date	19 March 2020
Date of evaluation	28 April 2020

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?

Registration data regarding domain names will be used for training a system that detects incorrect registration data and identifies suspect registrations. The data used may include the following personal data: name, e-mail address, phone number and address.

Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

Yes
 No, insofar as

By increasing the probability of incorrect registration data being detected and suspect registrations being identified, the project will help to raise the quality of the



data and will contribute to the security of the .nl zone. The Privacy Board considers that the privacy policy defines the purposes of the processing in specific and explicit terms. The purpose is consistent with SIDN's mission and vision and is therefore justified.

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 Privacy Board believes that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. During the training and testing phase, 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 Privacy Board considers that the relatively minor infringement of the subjects' privacy is justified by the defined 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 Privacy Board considers that the technical security level is appropriate. 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.

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 not be retained for any longer than necessary for training and testing of the system under development. The Privacy Board accordingly considers that the



personal data will not be retained for any longer than necessary for the defined purpose.

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 is concerned with the characteristics of real registration data.

Data reliability

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

The data comes from another source and is not modified by the processing performed in the context of the research.

Data processors

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

The SIDN Labs team.

Data security

How is the data protected against loss and unauthorised processing?

The data will be held on a server, access to which is controlled on the basis of personalised two-factor authentication (TOTP for SSH and client certificates for web, plus a user name-password combination).

Other

Special personal data

Is any special personal data processed?

- Yes
 No

Inclusion in register

Is the processing recorded 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?



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Yes

No

The data is obtained from the Domain Registration System (DRS).

Retention within EU

Is any data transferred to a country outside the EU?

Yes

No

Conclusion

Evaluation

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

In view of the limited duration of the processing and its context (the research), the Privacy Board approves the privacy policy.