



Privacy Policy Evaluation

SIDN data platform

Date

13 November 2023

Classification

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Author

Privacy Board

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Policy

Title of policy SIDN data platform

Policy start date 1 January 2024

Date of evaluation 13 November 2023

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 Privacy Board considers that the project will involve the processing of personal data. In the data platform, data from various sources, including personal data, will be stored and processed.

The personal data in question will be of the following types:

-All domain name transaction data

-All registrar transaction data (name, e-mail, phone number and address)

-Registrar classifications (segments)

-All registrant data (name, e-mail, phone number and address)



- Domain names associated with abuse
- Abuse classifications
- Abuse timings
- IP addresses of domain names looked up in the Whois
- Domain names validated by Valimon (domain name, error code where relevant)
- Trade Register number (DMAP)
- Registrars' billing data (e-mail, invoice content)

The processed data will include information about identified or identifiable natural persons. Personal data will be processed on an automated basis.

The GDPR may therefore be considered applicable.

Purpose

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 data platform is to serve as a central storage location, where data from various sources is brought together. The data in question will then be used for various analytical purposes within SIDN, and to facilitate the generation of reports and the population of dashboards for colleagues and registrars, and for stakeholders such as ICANN and CENTR. The Privacy Board considers that the Privacy Policy defines the purposes of the processing in specific and explicit terms.

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. The Privacy Board considers that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. Use of the data platform will facilitate both the definition of roles and permissions, and data management. The data platform will also have a positive effect on data quality and improve the security of data, including personal data. The data will be used for purposes including abuse prevention.



The processing is necessary for furtherance of SIDN's reasonable interest. No special personal data will be processed. The Privacy Board considers that the data platform 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

Authorisations will be defined separately for each layer of the data platform. The various layers will be 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 Privacy Board considers that the personal data will not be retained for any longer than necessary for the defined purpose. A retention period will be determined for each source or business object and specified in the separate privacy policy for that source or business object. The default retention periods will be 2 years for raw data and 5 years for aggregated data. The default retention periods are proportionate to the purpose of the personal data processing.

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 and up to date?

The data will be fetched from the various data sources referred to in the privacy policy. The raw data itself will remain the basis and will not be modified during processing on the data platform. The data will then be forwarded by automated



processes to the next layer of the data platform, where the historical sequence will be determined and data will undergo technical transformations. The origin of the data will be traceable via the pipelines. Transport from the various data sources to the data platform will be secured so that data cannot be modified in transit.

Data processors

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

Authorised members of the data team and data scientists within SIDN Labs. In addition, data from the consumable data layer will be shared with personnel in the Business & Support Department, the Finance Department, SIDN Labs and the MT. As a matter of principle, no personal data will be shared, unless necessary for the performance of professional duties.

Data security

How is the data protected against loss and unauthorised processing?

Authorisations will be defined separately for each layer of the data platform. The various layers 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

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 be obtained from the various data sources, each of which will be subject to a source-specific privacy policy, which will require approval by the Privacy Board.



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Retention within EU

Is any data transferred to a country outside the EU?

- Yes
- No

Data will be shared with registrars, some of whom are outside the EU. However, the data in question will relate to the registrars' own portfolios and will originate from those registrars.

Conclusion

Evaluation

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

The Privacy Board approves the Privacy Policy for the SIDN data platform.