



## Privacy Policy Evaluation

Registration Checker (RegCheck)

Date

24 June 2025

Classification

Public

Author

Privacy Board

Page

1/5

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### Policy

Title of policy Registration Checker (RegCheck)

Policy start date 01 February 2023

Date of evaluation 24 June 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

Why?

*The Privacy Board considers that the project will involve the processing of personal data. With the aim of identifying potentially hazardous domain name registrations, 2 categories of data will be processed: (1) the registrant data on all .nl domain names registered in the preceding 5 years, and (2) domain names registered in the last 10 years, without any accompanying registrant data. The data in question is domain name, registrant's name, Trade Register number, e-mail address, phone number, postcode, city, street, property number and country. The processed data may include information about identified or identifiable natural persons. The potentially hazardous domain name registrations will be shared with our Support Department, which will then decide in each case whether to investigate the registration further and whether to, for example, initiate an Article 18 procedure*

*(registrant verification procedure). Alternatively, RegCheck may start an Article 18 procedure itself.*

*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

*RegCheck is intended for the identification of potentially hazardous domain name registrations at the time of registration, for further investigation by our Support Department. Potentially hazardous domain name registrations are registrations that are very likely to be subsequently used for hosting malicious websites, such as phishing sites. Domain name registrations that involve erroneous registration data, but appear to be legitimately motivated are outside the scope of the study. The identification of potentially hazardous domain name registrations will help to increase the quality of the data and will contribute to the security of the .nl domain.*

*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 potentially hazardous domain name registrations where the registrant has malicious intentions constitutes a legitimate purpose. 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. The identification of potentially hazardous domain name registrations will help to increase the quality of the data and will contribute to the security of the .nl domain.*



*The operation of RegCheck requires the use of registrant data. The processing of such data is necessary for furtherance of SIDN's reasonable interest. No special personal data will be processed. If a domain name registration is identified as potentially hazardous, Support Department personnel will decide whether to investigate further and whether to, for example, initiate an Article 18 procedure. Alternatively, RegCheck may start an Article 18 procedure itself. The requested data is then checked manually, with the data subject/registrant having 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.*

*A small number of Support Department personnel will have access to the registrations referred to them by SIDN Labs on a daily basis. All instances of access will be logged. The registrations will be displayed on a protected online dashboard accessible only to authorised personnel. The online dashboard will be accessible only from the SIDN network, with access controlled by username-plus-password protection.*

*Moreover, all personnel with access to the data will be properly instructed in advance as to what they are permitted to do 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

*Registrant data will be retained for no more than 5 years, and domain names for no more than 10 years.*



Date  
24 June 2025

Classification  
Public

Page  
4/5

*The Privacy Board 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 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 personnel within SIDN Labs and the Support Department, who are involved with RegCheck.*

#### 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.*

*A small number of Support Department personnel will have access to the registrations referred to them by SIDN Labs on a daily basis. All instances of access will be logged. The registrations will be displayed on a protected online dashboard. The online 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?



Date  
24 June 2025

Classification  
Public

Page  
5/5

- ☒ 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 obtained from the Domain Registration System (DRS).*

## 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 Registration Checker.*