



## Privacy Policy Evaluation

Requesting registrant data via the website

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### Policy

Title of policy	Requesting registrant data via the website
Policy start date	01 September 2020
Date of evaluation	22 July 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?

*The Privacy Board considers that the project will involve the processing of personal data. The service involves sending a domain name registrant's name and address and other data to an e-mail address specified by the registrant in question. In addition, delivery of the service involves asking for the registrant's e-mail address and postcode to be re-entered.*

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 service is to allow registrants to see the data that SIDN holds regarding their domain names.*

#### 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 processing is contract fulfilment. The service enables registrants to see what data SIDN holds about them, and whether the data is correct.*

#### 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

*Data is sent only to the registrant's e-mail address, as registered with SIDN. The data that is used to request the service is used for authentication only. The service design is such that data cannot be sent to another address.*

##### 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 accordingly considers that the personal data will not be retained for any longer than necessary for the defined purpose. The disclosed data is not separately recorded anywhere else in connection with the service. The data that is provided (e-mail address and postcode) is retained for three months in order to monitor the quality of the service.*



**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 data provided by the registrant is needed in order to ensure that no one other than the registrant can use the service to access the registrant's details.*

**Data reliability** What is done to ensure that the gathered data is accurate?

*The data that is disclosed is the data that SIDN holds regarding the relevant domain name and its registrant, and is therefore correct by definition.  
If the data provided by the requesting party when requesting the service is not correct, the service is not provided.*

**Data processors** Who processes the data? Who else has access to the data?

*The following departments and parties have access to the data:*

- *Support and Communication personnel*
- *The service provider that hosts the SIDN website*

*A processing agreement has been concluded with the hosting service provider.*

**Data security** How is the data protected against loss and unauthorised processing?

*Data is sent only to the registrant's e-mail address, as registered with SIDN. The data provided by the registrant when requesting the service is used to verify that the requesting party is indeed the registrant.*

*The website via which the service is requested complies with SIDN's general security requirements.*

## **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



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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 that is disclosed is the data that the registrant has previously provided through the registrar that manages the registration.*

## Retention within EU

Is any data transferred to a country outside the EU?

Yes

No

If 'Yes', advice is required from the Privacy Board.

*The registrant's e-mail address may be outside the EU. However, given that the e-mail address used for data access provision is provided by the registrant, either the registrant is based outside the EU, or the registrant has chosen to have the data disclosed outside the EU. The Privacy Board therefore considers that no additional measures are required in order to protect the registrant's privacy when disclosing the registrant data to the e-mail address known to SIDN.*

## Conclusion

### Evaluation

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

*The Privacy Board approves the Privacy Policy.*