



Privacy Policy Evaluation

Threat Intel Pilot SIDN - DK Hostmaster

Date

1 March 2018

Classification

Public

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SIDN Privacy Board

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Policy

Title of policy Threat Intel Pilot SIDN - DK Hostmaster

Policy start date 01-03-2018

Date of evaluation 01-03-2018

Purpose limitation

Data Protection Act 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 data used includes IP addresses and domain names. The Privacy Board believes that a proportion of IP addresses can be traced back to natural persons. Hence an IP address can sometimes be an item of information regarding an identifiable natural person (Data Protection Act, Section 1a). The Privacy Board accordingly recommends that the data be treated as including personal data.

Will personal data be processed on an automated or semi-automated basis, or will personal data contained in a file be processed manually?

Yes. In light of the provisions of Section 2, subsection 1, of the Data Protection Act, the Act may be deemed applicable to the processing.



Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

- Yes
 No, insofar as

The Privacy Board believes that the privacy policy defines the purpose of the processing in specific and explicit terms, as referred to in Section 7 of the Data Protection Act. Moreover, the Privacy Board considers research whose ultimate aim is to improve fraud prevention, and thus to increase the security and stability of .nl, .dk and the internet as a whole, to be a legitimate purpose.

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 and trustworthiness of the .nl domain. The interests of the data subjects are not affected to an extent sufficient to warrant giving precedence to those interests. Hence, there is a legitimate basis, as referred to in Section 8f of the Data Protection Act.

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 believes that SIDN is in compliance with Section 9 of the Data Protection Act, since access to the data is restricted to SIDN Labs personnel who require such access in order to perform their duties. SIDN also provides the staff in question with work instructions detailing how they should treat personal data. Furthermore, access is given only to personnel who can provide a Certificate of Good Behaviour.



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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 is to be deleted as soon as the study has been completed. The Privacy Board therefore believes that the data retention arrangements are consistent with Section 10 of the Data Protection Act.

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 believes that SIDN is operating in compliance with Section 11 of the Data Protection Act, insofar as the data set 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 is collected by SIDN's own systems.

The Privacy Board believes that, in keeping with Section 11 of the Data Protection Act, the processed data relating to .nl may safely be assumed to be accurate, because it is gathered by SIDN itself using its own systems. Access to those systems is controlled, preventing third-party interference with the data.

Data processors

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

In keeping with Section 12 of the Data Protection Act, data is processed by SIDN Labs personnel, i.e. employees of the data controller who require access in order to carry out their duties. A processed dataset will be sent to DK Hostmaster.

Data security

How is the data protected against loss and unauthorised processing?

An encrypted connection is used to communicate data to DK Hostmaster. Within SIDN, the data is accessible only to SIDN Labs personnel via a secure VPN connection. The Privacy Board accordingly believes that access is adequately controlled, as per Section 13 of the Data Protection Act.



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Other

Special personal data Is any special personal data processed?

- Yes
- No

The Privacy Board believes that SIDN will not be processing any special personal data, as referred to in Section 16 of the Data Protection Act.

DPA declaration Is the data processing covered by SIDN's declarations to the Data Protection Authority?

- Yes
- No

Processing is covered by declaration number 1591862.

Subjects' rights If the personal data is not obtained from the subjects, but by other means, is the origin recorded?

- Yes
- No

Retention within EU Is any data transferred to a country outside the EU?

- Yes
- No

The data will be transferred only to Denmark.

Conclusion

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

The Privacy Board believes that the policy satisfies all applicable statutory and internal requirements.