

## **Privacy Policy**

CyberSterk experiment

Date 13 June 2019 Classification Public Author SIDN Page 1/2 Contact T +31 26 352 5500 support@sidn.nl www.sidn.nl

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| Title of application/study      | CyberSterk lean experiment   |
|---------------------------------|--|
| Policy start date               | 13 June 2019   |
| Purpose of<br>application/study | For market research purposes, a temporary website will be set up<br>for three weeks. The purpose of the website will be to gauge<br>interest in the (planned) CyberSterk security proposition. The e-<br>mail addresses provided by visitors will initially be used to<br>generate anonymised statistics. At a later stage, the e-mail<br>addresses provided may be used to send promotional material<br>about CyberSterk as part of the experiment. The total duration of<br>the experiment will be three months. |
| Personal data                   | The retained attribute will be an e-mail address, which is regarded as a personal data item.   |
| Legitimate basis                | Explicit consent will be sought from visitors for the processing of<br>their personal data (e-mail addresses), thus providing a<br>legitimate basis for such processing. The visitor will be invited to<br>tick a box to confirm a statement consenting to the use of their e-<br>mail address for sending relevant promotional material and<br>generating anonymised statistics.  |

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| Filters                    | No filters will be applied to the collected data. The e-mail<br>addresses will be stored on Firmhouse servers at a GDPR-<br>compliant location within the EU. Firmhouse is a Dutch<br>enterprise, which will supply the tooling to be used for the<br>experiment. Both SIDN project personnel and Greenberry project<br>personnel will have access to the compiled mailing list. A data<br>processing agreement has been made with Greenberry.                                    |
|----------------------------|---|
| Retention                  | The expectation is that the experiment will be completed within<br>three months. At the conclusion of the experiment, the collected<br>data will be deleted.  |
| Access                     | Only project personnel from SIDN and Greenberry will have access to the data.   |
| Publication/sharing        | The data will not be published or shared outside the project team.  |
| Туре                       | Research/marketing  |
| Other security<br>measures | The compiled e-mail address list will not be sent by e-mail or in<br>plain text format; it will be shared only using SIDN's secure<br>storage/sharing solution. In line with SIDN's security policy and<br>the agreements between SIDN and Greenberry, the data will not<br>be shared via any other medium.   |
|                            | Some e-mail addresses provided by visitors may be false or<br>incorrect. To prevent promotional material consequently being<br>sent to people who have not in fact consented to receive it, a<br>mailbox (cybersterk@sidn.nl) has been set up, via which people<br>may unsubscribe from the mailing list and may request the<br>manual deletion of their data. The mailbox may also be used by<br>people who have second thoughts and want their data deleted<br>from our system. |