



Privacy Policy Evaluation

DNS4ALL

Date

24 November 2022

Classification

Public

Author

Privacy Board

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Policy

Title of policy

DNS4ALL

Policy start date

TBA

Date of evaluation

24 November 2022

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 DNS traffic processed by the public resolver includes the IP addresses of resolver users, and all the DNS information sought by the user. The Privacy Board accordingly considers that personal data will be processed.

Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

Yes
 No, because



The Privacy Board considers that the privacy policy defines the purpose 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

Given that users must manually configure their systems to query the experimental DNS resolver, and do not have to enter into a user contract, and that no data is processed for any purpose other than to deliver the service, the Privacy Board considers that a reasonable interest exists, and that that interest constitutes a legitimate basis for processing the personal data. Furthermore, no data is retained. The Privacy Board therefore considers that the policy meets the proportionality and subsidiarity requirements.

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 data is processed once and not retained thereafter. The systems are secured against third-party access. The Privacy Board therefore considers that purpose limitation is adequately assured.

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

No data is retained.

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.

Data is processed exclusively in the context of providing the technical service. Hence, the data in question is inherently limited to that which is required for fulfilment of the purpose.

Data reliability

What is done to ensure that the gathered data is accurate?

Data is processed exclusively in the context of providing the technical service. The data in question must therefore be correct.

Data processors

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

Data is processed exclusively by the DNS resolver itself. No data is retained, and only to SIDN Labs staff and SIDN's system operators have access to the system running the service.

Data security

How is the data protected against loss and unauthorised processing?

The system is secured in accordance with SIDN Labs' general rules.

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

Subjects' rights

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

- Yes
 No

Data is processed exclusively in the context of providing the technical service. The origin of the data is not therefore recorded.



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

Yes

No

Conclusion

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

The Privacy Board approves the privacy policy for the DNS4ALL study.