



## Privacy Policy Evaluation

MINIONS-SPIN

Date  
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### Policy

Title of policy MINIONS-SPIN

Policy start date 09-09-2019

Date of evaluation 04-09-2019

### 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 Privacy Board considers that the project will involve the processing of personal data. The research data may include personal data in the form of IP addresses. The IP addresses in question will be the addresses of (1) people who scan IoT devices for vulnerabilities, (2) people who send commands to the IoT devices, (3) the victims of the activities in question.*

Purpose The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

Yes  
 No, insofar as

*The context of the personal data collection is clearly defined, namely the MINIONS and SPIN projects. The purpose of the research is to determine the characteristics of*



*insecure (infected) IoT devices with a view to helping to make IoT devices more secure.*

*The Privacy Board believes that the privacy policy defines the purposes of the processing in specific and explicit terms. The Privacy Board also believes that increasing the security of IoT devices is a legitimate purpose consistent with SIDN's mission and strategy.*

#### 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 research is consistent with SIDN's aim of promoting safe and convenient digital living. The Privacy Board therefore believes that the research team and SIDN have a reasonable interest in collecting data subjects' IP addresses.*

#### 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 personal data will be processed on SIDN's systems by project personnel, and will be protected by general security measures. The personal data will be shared via a secure connection. All data exchange will be encrypted. The Privacy Board accordingly considers the data security measures to be adequate.*

##### 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 believes that the retention period, which is aligned with the duration of the research, is appropriate.*

##### 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 the data set used is the minimum required for the fulfilment of the defined purpose of the processing. The study will involve data analysis, the precise nature of which is not yet known. It is not therefore possible to filter or anonymise the data prior to data analysis. IP address data is necessary in order to build a picture of relevant data flows.*

#### Data reliability

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

*The data originates from other parties. SIDN cannot therefore verify that the recorded data is accurate. However, any inaccuracies in the data will have only minor potential consequences for data subjects. Only IP addresses are recorded by automated means.*

#### Data processors

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

*MINIONS project personnel at Delft University of Technology.*

#### Data security

How is the data protected against loss and unauthorised processing?

*Access to the data is restricted to specified people. Log books are maintained, meaning that retrospective checks can be performed to verify that no unauthorised access has taken place. It is unclear whether access to the server and the server itself is secured.*

#### Other

##### Special personal data

Is any special personal data processed?

- Yes  
 No

##### Subjects' rights

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

- Yes  
 No

*The privacy policy states that the processed personal data is obtained from a third party.*



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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 MINIONS-SPIN, effective from 09 September 2019.*