



## Privacy Policy Evaluation

NTP traffic study

Date

12 October 2021

Classification

Public

Author

Privacy Board

Page

1/4

**Contact**

T +31 (0)26 352 5500

support@sidn.nl

www.sidn.nl

**Offices**

Meander 501

6825 MD Arnhem

The Netherlands

**Mailing address**

PO Box 5022

6802 EA Arnhem

The Netherlands

### Policy

Title of policy NTP traffic study

Policy start date 01 April 2022

Date of evaluation 12 October 2021

### 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 NTP traffic to be processed will include the IP addresses of clients that submit NTP time queries. Such clients may include home users' systems. 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, insofar as



The Privacy Board considers that the privacy policy defines the purposes of the processing in specific and explicit terms. The Privacy Board also considers increasing the security and stability of our NTP service 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 ultimate goal of the study is to improve the security of SIDN's NTP system and to increase the security and stability of the internet. The Privacy Board therefore considers that a legitimate basis for data processing exists, insofar as the processing serves a reasonable interest. In light of the chosen anonymisation method, the Privacy Board considers that the policy meets the subsidiarity requirement. Given that the data will be anonymised prior to further processing, the Privacy Board also considers that the policy meets the proportionality requirement.*

#### 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 systems that will be used for personal data processing are protected by general security measures. The data will be anonymised prior to further processing. 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

*The retention term of eight days is adequately justified in the policy itself: the chosen period makes it possible for the NTP queries to be matched to one another from a single source, without that source being known, for a period of one week (plus one day for processing) after anonymisation.*



Date  
12 October 2021

Classification  
Public

Page  
3/4

#### Data set limitation

*The Privacy Board accordingly considers that the personal data will not be retained for any longer than necessary for the defined purpose.*

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 only item of data in an NTP packet that may constitute personal data is the IP address of the client. Further analysis of the packets necessitates address processing. The addresses will accordingly be anonymised within eight days. The Privacy Board considers that the processing of the entire data set is necessary for the defined purpose.*

#### Data reliability

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

*The data will be gathered by SIDN Labs itself and will be stored on systems that are not accessible to third parties. The Privacy Board therefore considers that the data may be assumed to be accurate.*

#### Data processors

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

*The data is accessible only to SIDN Labs staff and SIDN's ICT system operators. The personnel in question have all been instructed on the processing of personal data.*

#### Data security

How is the data protected against loss and unauthorised processing?

*The data is processed within SIDN, in accordance with the generally applicable security policies, under which only authorised personnel have access. The Privacy Board considers the security of the systems involved to be adequate.*

#### 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



Date  
12 October 2021

Classification  
Public

Page  
4/4

### Subjects' rights

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

- Yes
- No

*The data will be measured from SIDN's own NTP server.*

### 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 NTP traffic study.*