



Privacy Policy Evaluation

BASTION

Date
17 May 2021

Classification
Public
Author
Privacy Board

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Policy

Title of policy	BASTION
Policy start date	1 July 2021
Date of evaluation	17 May 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 BASTION project will involve the use of honeypots for data collection. The data will generally consist of unsolicited network traffic intended to infect systems or devices with malware. The collected data will rarely include data regarding internet users, because malware that processes such data does not usually forward it to other systems it is seeking to infect, but sends it to a central point. However, the network traffic collected will include the IP addresses of infected devices, which we regard as personal data. The Privacy Board accordingly considers that the project will involve the processing of personal data.

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

Is the purpose specific, explicitly defined and legitimate?



- Yes
 No, insofar as

The purpose of the project is to study the abuse of IoT devices by botnets and other forms of malware, with the ultimate goal of supporting countermeasures.

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 legitimate basis for the data processing is reasonable interest. The project is intended to improve the security of the internet, particularly the Internet of Things, to the advantage of all internet users, including the data subjects. The Privacy Board considers that the project satisfies the relevant 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 systems on which the data is processed will be accessible only to SIDN personnel who have a genuine need to make use of the data.

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 will be anonymised or deleted after two years.

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 research project will involve the collection of data, the precise nature of which cannot be predicted, except insofar as it will include IP addresses. IP addresses are required in order to monitor infection levels and the spread of malware on the internet.

Data reliability

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

The data will be collected by SIDN itself.

Data processors

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

The data may be shared with other research centres. Any such sharing will be subject to the condition that an applicable data sharing agreement is made with each research centre concerned, under which the accuracy, purpose limitation, security and publication requirements of this policy are assured.

Data security

How is the data protected against loss and unauthorised processing?

The systems on which the data is to be processed are secured in accordance with SIDN's normal security policies, and are accessible only from SIDN's own network.

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

The processing is to be recorded if any significant new processing is involved.

Subjects' rights

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

- Yes
 No



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The data will be collected by SIDN itself.

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 BASTION.