



## Privacy Policy Evaluation

LogoMotive

Date

05 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

LogoMotive

Policy start date

01-02-2021

Revision date: 01-10-2021

Date of evaluation

11-02-2021

Revision date: 05-10-2021

### 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

*Screenshots of websites will be made, and website contents will be processed. In addition, the associated domain names and registration data will be processed. Such data may include personal data.*

*Internally, the names of the personnel who annotate the detections will also be processed.*

*The Privacy Board therefore considers that the GDPR is applicable.*



## 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 additionally considers that tackling the abuse of .nl domain names constitutes 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 Privacy Board considers that both SIDN's interest in the security and trustworthiness of the .nl domain, and the logo owners' interest in tackling fraudulent use of their logos constitute reasonable interests. The interests of the data subjects are not affected to an extent sufficient to warrant giving precedence to those interests. Hence, it is reasonable to conclude that there is a legitimate basis for the data processing.*

## 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

*Within SIDN, the data is accessible only to SIDN Labs personnel working on the project, and such access is adequately secured. Furthermore, the personnel in question have received instruction on handling personal 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 Privacy Board considers that the defined retention period of one year from the conclusion of the pilot is reasonable and consistent with the GDPR.*

#### 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 project is a pilot, which involves the processing of data selected on the basis of previous research. It is therefore reasonable to expect that all the data in question is necessary for fulfilment of the intended purpose. However, the pilot will be used to establish whether that is actually the case in practice.*

#### Data reliability

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

*The data to be processed consists of SIDN's own monitoring data and SIDN's own registration data. Access controls ensure that such data cannot be manipulated by third parties.*

#### Data processors

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

*Within SIDN, only project personnel will process the data. The data shared with third parties is covered by a data sharing agreement, which includes provisions regarding purpose limitation.*

#### Data security

How is the data protected against loss and unauthorised processing?

*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 in accordance with SIDN's security policy. The Privacy Board accordingly considers the data security measures to be adequate.*

#### Other

##### Special personal data

Is any special personal data processed?

- Yes  
 No



Date  
05 October 2021

Classification  
Public

Page  
4/4

**Notification of Data Protection Officer**

Has the Data Protection Officer been notified in connection with inclusion in the Processing Register?

- Yes
- No

**Subjects' rights**

The processing is to be recorded if any significant new processing is involved. If the personal data is not obtained from the subjects, but by other means, is the origin recorded?

- Yes
- No

*The sources of the data are defined in the project plan and the privacy policy.*

**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.*