

## **Privacy Policy**

Just-In-Time Transmitted Exception Report (JITTER) pilot

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Title of application/study	<u>J</u> ust- <u>I</u> n- <u>T</u> ime Transmitted <u>E</u> xception <u>R</u> eport (JITTER) pilot
Policy start date	4 January 2021
Purpose of application/study	JITTER is a prototype system that uses machine learning to generate warnings regarding domain names that may have been compromised, enabling the placement of malicious content (e.g. phishing content). As such, JITTER supports the identification of abuse before the relevant domain names appear in abuse lists.
	JITTER warnings are generated on the basis of abnormal DNS, infra and content characteristics exhibited by second-level domain names. SIDN Labs is unable to fully evaluate and process the generated warnings itself, since that would require additional information (e.g. regarding URL-level changes).
	As a registrar, Realtime Register (RTR) is in a better position to assess JITTER warnings, possibly through its resellers or hosters. SIDN Labs and Realtime Register will therefore run a joint pilot in order to evaluate the JITTER prototype.
Personal data	The following types of data processed by JITTER may include PII:
	<ul> <li>DRS (Domain Registration System)</li> <li>Registration date</li> <li>Domain name</li> <li>Name servers linked to a domain name</li> </ul>

**DMAP** (Domain name Ecosystem Mapper)

	SDN	
Date 04 January 2021	Classification Public	Page 2/3
	<ul> <li>IP address where the website linked hosted (A/AAAA record).</li> <li>Mail server linked to a domain name</li> <li>ENTRADA (ENhanced Top-level domain through Advanced Data Analysis)</li> <li>Domain name</li> </ul>	e (MX record).
	<ul> <li>Feedy (aggregation of abuse feeds)</li> <li>IP addresses of web servers that hav in the past. This information is used</li> <li>URLs at which abusive content has be This information is used as ground to</li> </ul>	as ground truth. been hosted in the past.
Legitimate basis	JITTER supports efforts to proactively tag and thus contributes to the security of the	
Filters	JITTER uses mainly aggregated data. Wh concerned, for example, the system focus have looked up domain names, rather tha addresses).	es on networks (ASs) that
Retention	We retain the data for up to two years, wi and improving JITTER on the basis of ne research into long-term impacts.	
Access	The data is accessible only by authorised by means of a user name and password. U machine on which the data is stored only by means of SSH or via a system console.	Jsers can access the from the SIDN network,
Publication/sharing	Is data shared with anyone outside SIDN	<i>V</i> ?
	Yes, warnings generated by JITTER are s Register, in order to improve Realtime Re domain name-related abuse associated w	egister's ability to address
	A warning consists of a .nl domain name and possibly suspect behaviour that our s possibly accompanied by a brief explanation the warning.	cans have detected,
	Realtime Register provides SIDN with fee quality and added value of the warnings.	edback regarding the



Date 04 January 2021 Classification Public Page 3/3

	If so, is personal data removed properly from the shared data? If not, or if that is not possible, has a data processing agreement been made with the party with whom data is shared?
	No personal data will be shared. However, a domain name may contain pointers to a natural person (as in janjansen.nl).
	Also, as a registrar, Realtime Register has the ability to look up the registrant data associated with a shared domain name.
	SIDN and Realtime Register have signed an agreement covering the processing of personal data.
	2) Is the party with whom data is shared based outside the EU? (If so, consider seeking the Privacy Board's advice)
	Not applicable.
Туре	Research and development
Other security measures	Not applicable.