



Privacy Policy

CyberSterk

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Classification
Public
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Title of application/study CyberSterk

Policy start date 01 October 2019

Purpose of application/study CyberSterk is a service provided by SIDN Business B.V., which is intended to provide business subscribers with a clear picture of their current cybersecurity status. By means of simple, understandable notifications, attention is drawn to potential security issues concerning the user's website or network (e.g. outdated software, configuration problems and infections). In addition, the user's data traffic is monitored and the alarm sounded if an active threat is detected (hacking, ransomware, etc.).

Development of this new proposition is divided into several phases. The pilot phase starts in October 2019 and runs until the end of June 2020. During the pilot, the product will be made available on a small scale through a number of agents (including registrars). The end users (business subscribers) are paying customers who arrange a CyberSterk subscription through an agent. The intention is to recruit several agents to participate in the pilot so that enough subscribers are recruited to make the exercise instructive.

Information gathered from the pilot, including feedback from the subscribers, will be used to guide the following phase of development. That phase will last for roughly six months and will involve scaling up the CyberSterk customer base.

By the end of the phase, SIDN Business B.V. will have made CyberSterk technically scalable and we will start operating the



service. The expectation is that SIDN Business B.V. will roll out CyberSterk as a commercial proposition in 2021.

If experience gained during development makes it desirable to revise the arrangements for personal data processing in the context of CyberSterk, details of the revised arrangements will be submitted to the Privacy Board for review.

Personal data

The following data is processed:

- Subscribers' names and contact details, including e-mail addresses and phone numbers
- Agents' names and contact details, including e-mail addresses and phone numbers
- Financial data for subscriber invoicing
- Financial data for the payment of agents' fees
- IP addresses and URLs of subscribers' devices and websites
- IP addresses of external services accessed from subscribers' networks
- IP addresses of external sources of attacks or suspect activity directed towards subscribers' networks
- Network traffic
- Details of detected issues and incidents
- Details of subscribers' IT partners (if provided by subscribers)

The various types of data listed above may include information that falls within the definition of personal data.

The details of detected issues and incidents will include IP addresses and URLs for source identification purposes. The data will be stored by SIDN and by partners commissioned to assist with data analysis.

The issue and incident details may include information regarding vulnerabilities in subscribers' websites and systems.

Legitimate basis

Two legitimate bases for personal data processing apply: contract fulfilment and reasonable interest.

Filters

No filters will be applied to the collected data. The personal data, IP addresses and URLs will be stored at a GDPR-compliant location within the EU.



The following parties will have access to the data:

- Agents
- The real-time network traffic data processor
- The network/website scan data processor
- The party commissioned by SIDN to provide technical support (if requested by the subscriber)
- SIDN (as the wholesale service provider)

Data processing agreements will be made with all data processors.

Retention

All collected data will be retained for the duration of the subscription. In the event of subscription cancellation, the scan data, including historical data, will be deleted immediately.

Subscriber details (name, contact details, Trade Register number, company registration details) will be retained for seven years and then deleted, as required by law.

Access

The personnel of each agent will have access to data concerning the subscribers for whom that agent is responsible. SIDN Business B.V. will have access to all overview data.

Publication/sharing

The data will not be published or shared.

Type

Production

Other security measures

Each subscriber's personal data will be shared with the parties involved in delivery of the service to that party. That will involve use of SIDN's secure storage and sharing solutions, in accordance with SIDN's security policy and the contracts closed with the relevant partners.

The following individuals and departments within SIDN will also have access to such data:

- IT / Development / Management / SOC
- Support
- Marketing
- Analysts (for the categorisation of issues and translation into scan results)

The shared data will be limited to the minimum required for the performance of the relevant activities.