Privacy Policy Evaluation

FIRMBACKBONE Utrecht University-SIDN

Date	Classification	Page	**SIDN BV**
6 March 2023	Public	1/5	
	Author		**Contact**
	Privacy Board		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 Netherland

Registration
Arnhem 88 77 28 96

Policy

Title of policy — FIRMBACKBONE Utrecht University-SIDN

Policy start date — 1 December 2022

Date of evaluation — 6 March 2023

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 Privacy Board considers that the project will involve the processing of personal data. Once each calendar quarter, SIDN will provide Utrecht University with a list of business domain names and Trade Register numbers. The data may include information relating to identifiable natural persons, if for example a domain name has been registered by a party without legal entity status, or if a natural person is named as the registrant. Since such data can be traced to a natural person, the GDPR is applicable.

Date
6 March 2023

Classification
Public

Page
2/5

Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?

☒ Yes
☐ No, insofar as

Utrecht University aims to build a data infrastructure populated with information about Dutch enterprises for scientific research purposes.
The personal data will be processed for the purpose of enabling Utrecht University to perform web-scraping and text-mining experiments and thus to collect relevant business information, which can subsequently be added to the FIRMBACKBONE environment (the databank). The shared data will also enable the university to test the FIRMBACKBONE infrastructure.

Once each calendar quarter, Utrecht University will reciprocally share its knowledge and experience with SIDN, including relevant results that may enable SIDN to develop a better web crawler. The latter objective is consistent with SIDN's mission and vision.

The Privacy Board considers that the Privacy Policy defines the purposes of the processing in specific and explicit terms.

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 personal data processing is a reasonable interest. The Privacy Board considers that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. The exchanging of data and knowledge between Utrecht University and SIDN may enable SIDN to develop a better web crawler. The web crawler results are used for research into (and thus action to improve) the quality, security and stability of .nl and the wider internet. The processing is therefore necessary for furtherance of SIDN's reasonable interest.

The Privacy Board considers that the project satisfies the relevant proportionality and subsidiarity requirements. The associated privacy infringement is justified by the purpose. The interests of the data subjects are not affected to an extent sufficient to warrant giving precedence to those interests. The data subjects will not be

Date
6 March 2023

Classification
Public

Page
3/5

adversely affected by the web-scraping and text-mining experiments, and the information provided via FIRMBACKBONE will not include business-specific data, or the domain names from which the information is derived.

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 data will be accessible only to a select group of researchers working on the FIRMBACKBONE project. The cooperation agreement between SIDN and Utrecht University stipulates that the data may be used exclusively for the activities defined in the agreement, and that the university may not (re)use the data, either for its own purposes, or for any other purpose.

The agreement also stipulates that the information provided by SIDN must not be made available to current or future FIRMBACKBONE users. The information provided via FIRMBACKBONE will not include business-specific data, or the domain names from which the information is derived.

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

Once each calendar quarter, for a period of 1 year, SIDN will provide Utrecht University with a list of business domain names and associated Trade Register numbers. At the end of the 1-year period, or immediately upon termination of the cooperation agreement if termination occurs before the end of the 1-year period, the data will, at SIDN's request, be destroyed or returned to SIDN, and Utrecht University will be obliged to make no further use of the data.

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 Privacy Board considers that the data set to be used is the minimum required for the fulfilment of the defined purpose of the processing. SIDN will share only

Date
6 March 2023

Classification
Public

Page
4/5

business domain names and, where applicable, the associated Trade Register numbers.

Data reliability

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

The data is obtained by SIDN's own monitoring.

Data processors

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

The data will be accessible only to a select group of researchers working on the FIRMBACKBONE project, for further web-scraping and text-mining experiments. The researchers in question will be able to access the data only within a secure Utrecht University environment.

At SIDN, the data will be accessible only by authorised personnel working in a secure environment, by means of a username-password combination and a second authentication factor.

Data security

How is the data protected against loss and unauthorised processing?

The data will be shared via SIDN's Cryptshare account, which allows data to be downloaded only after providing a password. Data is automatically deleted from the Cryptshare server after 7 days.

Downloaded data will be saved in a secure Utrecht University environment. The cooperation agreement between SIDN and Utrecht University requires both parties to maintain the confidentiality of exchanged information.

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

Add 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

The data is obtained by SIDN's own monitoring.

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 FIRMBACKBONE Utrecht University-SIDN.