



Privacy Policy Evaluation

COMAR

Date
04 August 2020

Classification
Public
Author
Privacy board

Page
1/4

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Policy

Title of policy Classification of Compromised versus Maliciously Registered Domains (COMAR)

Policy start date 09 July 2020

Date of evaluation 04 August 2020

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. The COMAR study involves the processing of data about domain names and registrars. Under certain circumstances, the processed data may include information about identified or identifiable natural persons.

Automated processing of personal data included in a file is also carried out. Hence, the GDPR may be deemed applicable.

Purpose

The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?



- Yes
 No, insofar as

The COMAR study will help registrars, registries and others to optimise their anti-abuse processes. By doing so, the study will contribute to the security of the .nl zone. The Privacy Board considers that the privacy policy defines the purposes of the processing in specific and explicit terms. The purpose is consistent with SIDN's mission and vision and is therefore justified.

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 Privacy Board believes that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. Processing is not expected to have any adverse implications for data subjects. The Privacy Board considers that the study is justified by the defined purpose.

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 Privacy Board believes that adequate safeguards are in place to control access to the personal data. In addition, a contract has been made with Grenoble INP, which stipulates that the data must be used exclusively for the study defined in the policy.

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 twelve-month data retention period is reasonable, insofar as it allows sufficient time after the study period for the project to be properly concluded and, where appropriate, for the results to be published.

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 used is the minimum required for the fulfilment of the defined purpose of the processing.

Data reliability

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

Some of the data to be processed comes from our own registration database, and some from another source (abuse feeds); the data is not modified by the processing performed in the context of the research.

Data processors

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

Both within SIDN and within Grenoble INP, access to the data is restricted to project personnel.

Data security

How is the data protected against loss and unauthorised processing?

Data is exchanged via a webservice/RESTful API with TLS encryption. The API is password-protected and therefore accessible only to authorised personnel.

Other

Special personal data

Is any special personal data processed?

- Yes
 No

Inclusion in register

Is the processing recorded in the Processing Register?

- Yes
 No

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



Date
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Classification
Public

Page
4/4

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 from the Domain Registration System (DRS) and from external providers.

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 subject to the condition that an appropriate contract is closed with Grenoble INP.