



Privacy Policy Evaluation

Ransomware Deployment Analysis with Tesorion

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17 July 2019	Public	1/4	T +31 26 352 5500
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Policy

Title of policy	Ransomware Deployment Analysis with Tesorion
Policy start date	01-08-2019
Date of evaluation	16-07-2019

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 research will involve the processing of DNS query data, which may include personal data. Since the data will relate to queries regarding a specific list of domain names, the personal data involved will consist primarily of the IP addresses of the query senders. In many cases, the senders will be shared DNS resolvers. However, some domestic systems may be involved.

The Privacy Board considers that only the initial processing within SIDN will involve personal data. The IP addresses will be removed from the shared data, meaning that the GDPR is not applicable to any processing performed after sharing.

Purpose The purpose must be specific, explicitly defined and legitimate.

Is the purpose specific, explicitly defined and legitimate?



- Yes
- No, insofar as

The purpose of the study is to identify the main countries targeted by a particular ransomware program, and to clarify whether the Netherlands is one of them and how the ransomware is spread. The study will therefore contribute to improved internet security in the Netherlands and elsewhere.

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

A better understanding of how malware spreads increases our ability to keep the internet secure. The Privacy Board therefore considers that a legitimate basis for data processing exists, insofar as the processing serves a reasonable interest.

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

All personal data processing will take place within SIDN and will be subject to the same safeguards and control measures that SIDN applies to other ENTRADA-related projects.

The processing carried out after the data is shared will not involve 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 data will be deleted upon conclusion of the research on 30 September 2019.



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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 is satisfied that no data will be processed that is not necessary for the defined purpose of the research.

Data reliability

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

The data will be collected by SIDN's own servers in the course of normal operations and will therefore be inherently reliable.

Data processors

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

The personal data involved will be processed exclusively by SIDN. No one other than SIDN's operators and the SIDN Labs staff will have access to the personal data involved in the study.

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

Only DNS query data will be processed. The Privacy Board accordingly considers that no special personal data will be processed.

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.



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Subjects' rights

If the personal data is not obtained from the subjects, but by other means, is the origin recorded?

- Yes
- No

The data will originate from SIDN's own servers and will be collected in the course of normal operations.

Retention within EU

Is any data transferred to a country outside the EU?

- Yes
- No

If 'Yes', advice is required from the Privacy Board.

Conclusion

Evaluation

What is the conclusion of the Privacy Board's evaluation?

The Privacy Board approves the privacy policy with effect from 1 August 2019.