



## Privacy Policy Evaluation

DMAP

Date

20 January 2022

Classification

Public

Author

Privacy Board

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### Policy

Title of policy

DMAP

Policy start date

20 January 2022

Date of evaluation

20 January 2022

### 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.*

*In order to scan and analyse domain names, personal data is processed, including IP addresses, Trade Register numbers, postal and office addresses and phone numbers. In some cases, screenshots of websites are made, which may also include personal data. The processed data may include information about identified or identifiable natural persons.*

*Automated processing of personal data is also carried out. We may therefore assume that the GDPR is applicable.*



## 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 DMAP is to collect information about the usage and security of domain names. That is done using a crawler. The crawler is made up of various sub-crawlers, each of which collects particular information, such as:*

- *DNS*
- *HTTP*
- *TLS*
- *SMTP*

*The data is recorded in a database and used for research and internal SIDN applications, such as:*

- *The Registrar Scorecard (RSC), an incentive programme to promote the use of modern internet standards amongst registrars and thus raise the technical and substantive quality of the .nl domain*
- *The SIDN Labs statistics page, where aggregated data is used to shed light on developments involving the various internet standards*
- *SIDN BrandGuard, a tool that draws users' attention to potentially malicious websites*
- *Analysis and research by SIDN Labs colleagues, with the ultimate aim of increasing the security and stability of .nl and the internet as a whole*

*The crawler also has screenshot functionality, which has the potential to record personal data. The functionality is disabled by default, but can be enabled for particular studies and applications. A separate privacy policy is produced and evaluated for each application that uses screenshot functionality.*

*The Privacy Board considers that the privacy policy defines the purposes of the processing in specific and explicit terms. The Privacy Board also considers the collection of information about domain name usage and security with a view to increasing the security and stability of the .nl domain to be a legitimate purpose. Processing serves a reasonable interest and therefore has a legitimate legal basis in the context of the GDPR. Moreover, the purpose is consistent with SIDN's mission and vision.*

## 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 considers that a reasonable interest is served in connection with SIDN's commitment to the security of the .nl domain. The collection of information about the usage and security of domain names contributes to the security of .nl. The processing is necessary for furtherance of SIDN's reasonable interest. No special personal data will be processed.*

*The Privacy Board considers that the application satisfies the relevant proportionality and subsidiarity requirements. The associated minor privacy infringement is justified by the 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 data is accessible only by authorised users within SIDN Labs, by means of a username and password. All authorised users within SIDN have received detailed guidance on the importance of privacy.*

### 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 purpose is to collect information about the usage and security of domain names. Analyses and research covering extended time periods are important for improving the security of .nl. The data is therefore retained for five years.*

*Not all data is relevant for long-term analysis. Personal data that is not relevant for historical analyses, such as postal and office addresses and phone numbers, is anonymised after two years.*



*The Privacy Board considers that the stated retention periods are appropriate in the context of the defined purpose. The personal data is not retained for any longer than necessary for the defined purpose.*

**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.*

**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?

*Authorised personnel within SIDN Labs and SIDN's ICT and database management teams have access.*

**Data security**

How is the data protected against loss and unauthorised processing?

*The data will be saved in a secure database. The data will be accessible only from the SIDN network or via a secure VPN tunnel. Authorised users within SIDN will require a username and password to access the data.*

**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



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The processing is to be recorded 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 from DMAP.*

### Retention within EU

Is any data transferred to a country outside the EU?

- Yes  
 No

*No data is to be transferred to a country outside the EU.*

### Conclusion

#### Evaluation

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

*The Privacy Board approves the privacy policy, subject to the condition that the personal data retained on a long-term basis is reduced to a small number of attributes that are genuinely relevant for long-term analyses and historical research.*