



## Privacy Policy

CyberSterk experiment

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13 June 2019

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Title of application/study CyberSterk lean experiment

Policy start date 13 June 2019

Purpose of application/study For market research purposes, a temporary website will be set up for three weeks. The purpose of the website will be to gauge interest in the (planned) CyberSterk security proposition. The e-mail addresses provided by visitors will initially be used to generate anonymised statistics. At a later stage, the e-mail addresses provided may be used to send promotional material about CyberSterk as part of the experiment. The total duration of the experiment will be three months.

Personal data The retained attribute will be an e-mail address, which is regarded as a personal data item.

Legitimate basis Explicit consent will be sought from visitors for the processing of their personal data (e-mail addresses), thus providing a legitimate basis for such processing. The visitor will be invited to tick a box to confirm a statement consenting to the use of their e-mail address for sending relevant promotional material and generating anonymised statistics.

Filters No filters will be applied to the collected data. The e-mail addresses will be stored on Firmhouse servers at a GDPR-compliant location within the EU. Firmhouse is a Dutch enterprise, which will supply the tooling to be used for the experiment. Both SIDN project personnel and Greenberry project personnel will have access to the compiled mailing list. A data processing agreement has been made with Greenberry.



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**Retention**

The expectation is that the experiment will be completed within three months. At the conclusion of the experiment, the collected data will be deleted.

**Access**

Only project personnel from SIDN and Greenberry will have access to the data.

**Publication/sharing**

The data will not be published or shared outside the project team.

**Type**

Research/marketing

**Other security  
measures**

The compiled e-mail address list will not be sent by e-mail or in plain text format; it will be shared only using SIDN's secure storage/sharing solution. In line with SIDN's security policy and the agreements between SIDN and Greenberry, the data will not be shared via any other medium.

Some e-mail addresses provided by visitors may be false or incorrect. To prevent promotional material consequently being sent to people who have not in fact consented to receive it, a mailbox ([cybersterk@sidn.nl](mailto:cybersterk@sidn.nl)) has been set up, via which people may unsubscribe from the mailing list and may request the manual deletion of their data. The mailbox may also be used by people who have second thoughts and want their data deleted from our system.