



Privacy Policy Evaluation

Joint Threat Intelligence Enrichment

Date
1 August 2017

Classification
Public
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SIDN Privacy Board

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Policy

Title of policy Joint Threat Intelligence Enrichment (JTIE)

Policy start date 2017-08-01

Date of evaluation 2017-08-01

Purpose limitation

Data Protection Act 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

If 'No', a privacy policy is not required.

DNS queries are processed, which include IP addresses. The registrar's name is processed to generate a pseudonym.

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

Is the purpose specific, explicitly defined and legitimate?

Yes
 No, insofar as

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

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

A data sharing agreement is in place and access to the data is secured in accordance with the ENTRADA 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 IP addresses and registrar names are removed from the dataset before the data is saved.

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.

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

Internally sourced data, as per ENTRADA policy.

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

The data is accessible only to SIDN Labs staff and SIDN's system operators. The personnel in question have all been instructed on the processing of personal data.



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Data security

How is the data protected against loss and unauthorised processing?

Data is exchanged via a secure connection.

Other

Special personal data Is any special personal data processed?

- Yes
 No

DPA declaration

Is the data processing covered by SIDN's declarations to the Data Protection Authority?

- Yes
 No

Processing is covered by declaration number 1591862.

Subjects' rights

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

- Yes
 No

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 believes that the policy satisfies all applicable requirements.