

## **Privacy Policy**

**LEMMINGS** 

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Title of application/study LEMMINGS: deLetEd doMain Mall warNinG System

Policy revision date 14-05-2025

Policy start date 14-05-2025

Purpose of application/study

LEMMINGS is a system for the automatic detection of cancelled .nl domain names to which mail is still being sent. By means of LEMMINGS, SIDN and the .nl registrars wish to work together to alert the former registrants of cancelled domain names to potential data breaches. The type of data breach that we are seeking to prevent occurs when the cancellation of a domain name leads to sensitive mail reaching an unintended recipient. Such leaks have recently affected the youth care service1, a healthcare service provider2 and the

police3.

 $<sup>^{1}\,\</sup>underline{\text{https://www.rtlnieuws.nl/nieuws/nederland/artikel/5187220/jeugdriagg-kenter-jeugdhulp-datalek-dossiers}$ 

<sup>&</sup>lt;sup>2</sup> https://www.vecozo.nl/over-ons/nieuws-en-agenda/2020/reactie-op-berichtgeving-rtl-nieuws/

<sup>&</sup>lt;sup>3</sup> https://www.security.nl/posting/417132/Politie+laat+geregistreerde+domeinnamen+verlopen



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LEMMINGS makes use of DNS traffic data (ENTRADA) to determine the likelihood that mail is still being addressed to a given domain name after its cancellation. Where appropriate, LEMMINGS sends the former registrant an e-mail warning of the potential hazards associated with domain name cancellation and highlighting the fact that mail appears to still be going to the domain name in question. The alert is worded so as to be understandable for people with little expertise regarding domain names or e-mail technology. The corresponding registrar is sent a list of the domain names whose former registrants have been alerted. However, SIDN does not share the contents of the alert messages with registrars.

Personal data

LEMMINGS makes use of the following data, which has the potential to be personally identifiable information:

## DRS

- Domain name
- Cancellation date
- Name of former registrar
- Name of former registrant
- E-mail address of former registrant

## **ENTRADA**

- Domain name (qname)
- Resolver IP address

Legitimate basis

LEMMINGS serves a general interest, namely enabling former registrants to be alerted to potential data breaches that could be exploited for malicious purposes.

LEMMINGS therefore contributes to the security of and trust in .nl and the internet.

Filters None

Retention

During the monitoring period that follows the cancellation of a domain name, we retain the data required for monitoring. At the end of the monitoring period, privacy-sensitive data is anonymised, and the anonymised data is retained for up to three years with a view to supporting the long-term impact of LEMMINGS.

Access The data is accessible only by authorised users within SIDN

Labs and SIDN's Support Department, by means of a username

and password.



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Publication/sharing The data will be used for statistical research, the results of

which may be published. The raw data will not be published or

shared.

Type R&D prototyping and research

secure VPN tunnel.