

# **Overview of selected KPN Security Policies**

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<b>Requirement</b>	<b>Retention periods</b>
<b>Description</b>	Data must be stored in accordance with legal retention periods.
<b>Supplement</b>	Internet traffic data may only be stored for a period of maximum 6 months.
<b>Related info</b>	See “Juridisch Doe-Het-Zelf” on TEAMKPN
<b>ID</b>	KSP-RE-631
<b>Version</b>	1.0
<b>Date</b>	December 11, 2017
<b>Rationale</b>	Law and regulation

Requirement	Opt-in and Opt-out
<b>Description</b>	KPN has a legitimate interest in processing customer data for (direct) marketing and analysis. A trade-off should be made between the interest of KPN and the privacy of the customer. If the information is less sensitive the balance is in favour of KPN. KPN may use this information, but the customer must have an opportunity to object (hence opt-out). If the information is more sensitive they can only be used with the prior permission of the customer (hence opt-in). Examples of less sensitive data are customer registration data, installed base, product/service usage. Examples of more sensitive data are traffic data or data regarding online behaviour.
<b>Supplement</b>	An analysis of mobile traffic data for marketing purposes may only be made with prior permission of the customer.
<b>Related info</b>	See factsheet Customer Privacy – Opt-in / Opt-out Compliancy Beleid  <a href="http://teamkpn.kpn.org/group/kpninfo-read/groep-juridisch-doe-het-zelf/pS_T9DOv9QKXINVQTtBaRB2wsGtqMnl7_v-yxpjqZk0H_CmybaW2BA**/">http://teamkpn.kpn.org/group/kpninfo-read/groep-juridisch-doe-het-zelf/pS_T9DOv9QKXINVQTtBaRB2wsGtqMnl7_v-yxpjqZk0H_CmybaW2BA**/</a>
<b>ID</b>	KSP-RE-640
<b>Version</b>	1.0
<b>Date</b>	December 11, 2017
<b>Rationale</b>	Law and regulation

<b>Requirement</b>	<b>Identity Management Systems</b>
<b>Description</b>	Identity Management systems (and chains of systems), such as (but not limited to) Active Directory Servers, Kerberos Servers, Identity & Access Management systems must be located within KPN premises and maintained by KPN (EP) employees.
<b>Supplement</b>	<p>KPN must be in ultimate control of who can access information of KPN's customers and KPN.</p> <p>An application owner must be able to grant or deny access to the information systems under his control, without possible intervention by third parties.</p>
<b>ID</b>	KSP-RE-375
<b>Version</b>	1.0
<b>Date</b>	December 11, 2017
<b>Rationale</b>	Central identity and access management

Requirement	Encryption Algorithms
<b>Description</b>	<p>One of the following encryption primitives must be used for encryption and decryption:</p> <p>AES-256, AES-192 and AES-128</p> <p>XSalsa20/20</p> <p>Salsa20/20</p> <p>Twofish</p> <p>IDEA; the key must be generated using a hash algorithm from KSP-RE-483, like SHA2.</p> <p>For AES use known good AES-authenticated modes:</p> <p>GCM</p> <p>CCM</p> <p>Use non-authenticated AES modes only in combination with an authentication method, like HMAC:</p> <p>CTR</p> <p>XTS</p> <p>The following encryption primitives should not be used. Use only for legacy support or explicit compatibility requirements:</p> <p>AES-256-CBC, AES-192-CBC and AES-128-CBC</p> <p>Three-key Triple DES</p> <p>Blowfish</p> <p>All not explicitly mentioned encryption algorithms are not allowed. Example are:</p> <p>RC4</p> <p>All EXPORT ciphers</p> <p>All encryption algorithms resulting in less than 112 security bits</p> <p>The use of a random nonce or initialisation vector (IV) with sufficient length is mandatory with each of these encryption algorithms. To generate a good nonce or IV use a good random bit generator.</p>
<b>Related info</b>	<p>NIST Special Publication 800-131Ar1: Transitions: Recommendation for Transitioning the Use of Cryptographic Algorithms and Key Lengths</p>
<b>ID</b>	<p>KSP-RE-479</p>

<b>Version</b>	1.1
<b>Date</b>	August 16, 2018
<b>Rationale</b>	Cryptography generic

<b>Requirement</b>	<b>Pseudonymization</b>
<b>Description</b>	Personal data must be stripped from directly identifying characteristics by using hashing.
<b>Supplement</b>	Personal data must be processed in such a way, that the identifiable personal information is encrypted. People may no longer be identifiable without undoing the encryption.
<b>ID</b>	KSP-RE-706
<b>Version</b>	1.0
<b>Date</b>	June 18, 2018
<b>Rationale</b>	Law and regulation

<b>Requirement</b>	<b>Data minimization</b>
<b>Description</b>	Only strictly necessary information may be collected and only for the purposes for which they are processed.
<b>Supplement</b>	During the development of new services and products must be considered what personal data are needed to provide the service or product to realize data minimization.
<b>ID</b>	KSP-RE-703
<b>Version</b>	1.0
<b>Date</b>	June 18, 2018
<b>Rationale</b>	Law and regulation



<b>Requirement</b>	<b>Facilitate stakeholder rights</b>
<b>Description</b>	In the privacy statement must be listed how customers exercise their rights.
<b>Supplement</b>	To be able to provide or erase personal information it must be possible to provide a person concerned with data in a machine readable format (right to data portability or the right to oblivion).
<b>ID</b>	KSP-RE-705
<b>Version</b>	1.0
<b>Date</b>	June 18, 2018
<b>Rationale</b>	Law and regulation

<b>Requirement</b>	<b>Anonymization</b>
<b>Description</b>	All (in)directly identifiable information must be removed.
<b>Supplement</b>	Personal data must be processed in such a way, that they are no longer usable to identify a natural person. This means that the processing should be irreversible.
<b>ID</b>	KSP-RE-702
<b>Version</b>	1.0
<b>Date</b>	June 18, 2018
<b>Rationale</b>	Law and regulation