Driving innovation together

DPIA TOPdesk

Technical Appendix

Author(s)): Winfried Tilanus, Evan Blommaert
Version: 1.0
Date: 15 January 2025

This publication is licensed under a Creative Commons Attribution 4.0 International.

Table of Contents

Summary

In most cases TOPdesk only makes connections to first party hosts and places only functional cookies. Exceptions are when via web integrations a link is made to an external source, like YouTube, or when the status.topdesk.com page is opened via the admin site. In both cases, third party requests are made and tracking cookies are placed. During testing, Cloudflare redirected through recaptcha, which is also setting cookies.

The logfiles are extensive and the policies around the use of the various loglevels and inclusion of Personal Data at various loglevels seem to be inconsistent.

Relevant parts of the communication surrounding the Data Subject Access Request are attached in Chapter 5 of this Technical Appendix. Full copies of communication are available at the request of SURF.

1 Test setup

The testing was done on the staging environment of a organisation for higher education. TOPdesk is a webapplication, so all traffic interception was done with a browser that proxied both the HTTP and the HTTPS connections through a man in the middle proxy (MITMproxy), using the proxy function of the connection field of the browser. All observed connections were HTTPS encrypted.

To enable HTTPS decryption, a wildcard SSL-certificate of MITMproxy was installed in the underlying Operating System. Each user had an own, dedicated, browser profile. Each profile was setup newly. All settings that might cause blocking of traffic were disabled and as much as possible functions that might browser initiated traffic to third parties were also disabled.

Table 1: Test environment

Name	Details	Description
Platform	TOPdesk	Patch level 2025-07-15
Web browser	Firefox	Patch level 2025-07-15
Proxy	Man-in-the-middle proxy 12.1.1	
VPN	OpenVPN	Via mobile connection, endpoint at private connection of one of the investigators, IPv4 and IPv6 connectivity
OS	Windows 10	Patch level 2025-07-15, underlying OS of both Browser and Proxy

Table 2: Test accounts

Name	E-mail	Username	Role
Sanne Ouburg	sanne.ouburg@privacycompany.nl	SEOG	Support
Arnold Roosendaal	arnold.roosendaal@privacycompany.nl	ADRL	Security Officer
Winfried Tilanus	winfried.tilanus@privacycompany.nl	WDTS	School Safety Coordinator
Evan Blommaert	evan.blommaert@privacycompany.nl	ENBT2	Supervisor/Administrator

2 Test scenario's

2.1 Summary

Table 3: Overview test scenario's

Test	Users/Roles	Use case	Details
1	Security Officer & Support	TOPdesk as a ticketing system for IT services	1. Request for IT support by Security Officer 2. Processing the Call by Support
2	Security Officer, Support & Supervisor / Administrator	TOPdesk for processing sensitive information relating to device, incident and application management and complaint handling	1. Request for Change (RfC) by Security Officer 2. View RfC by Support 3. Process RfC by Supervisor/Administrator
3	All roles	TOPdesk as system for incident management (handling of information security incidents and personal data breaches)	1. Report personal data breach by School Safety Coordinator 2. All roles attempt to view Call 3. Process Call by Supervisor/Administrator
4	Support, School Safety Coordinator & Supervisor / Administrator	TOPdesk for registration of accidents/inappropriate behaviour in the context of social safety TOPdesk within the HR department for the handling of inquiries, integral safety, complaints and confidentiality issues	1. Report inappropriate behaviour by Support 2. Process Call by School Safety Coordinator 3. Attempt to open Call as Supervisor/Administrator
5	Supervisor / Administrator	- Application and audit logging - The establishment of authorisation and access rights within TOPdesk by organisations.	1. Search through modules, dashboards, configuration options (including authorisations) etc. 2. Download log files
Additional tested scenarios			

6	Support	TOPdesk as Knowledge Base	Create Knowledge Item from Call

A Dutch educational organisation created four accounts for the test users. These accounts were registered under the names of existing persons so that there would be no dispute about whether the test accounts contained personal data, for example in the event of access requests. This concerned four accounts registered under the names of four Privacy Company employees, see Table 2 above. The other test data, such as the information entered into/contained in a Call, RfC or an attachment, was fictitious.

Each test was performed in the dedicated profile for that user of the Firefox browser and logging in was done with one of the four test accounts. Only one browser window was opened at the time and before closing a browser window, the authenticated user was signed of. This meant that each test also started with the user being re-authenticated.

2.2 Full test scenarios

Table 4: Full test scenarios

#	Test scenario	User	Steps
1	TOPdesk as a ticketing system for IT services Security Officer & Additional: TOPdesk as Knowledge Base	Security Officer Analysis in: 01 indienen melding	1. Access TOPdesk portal as Security Officer via login interface 2. Enter credentials 3. Create Call via SSP, including an attachment containing sensitive personal data 4. Submit Call 5. Sign out
		Support Analysis in: 02 afhandelen	6. Access TOPdesk backend as Support 7. Enter credentials 8. Open Call via First Line Call overview to provide response to Security Officer 9. Assign Call to Sanne Ouburg 10. Write response to Security Officer in Call 11. Write 'hidden response'[1] 12. Sign out

[1] As an agent in TOPdesk, you can hide your response to a Call from the caller who submitted it.

		Security Officer Analysis in: 03 reageren op melding	13. Access TOPdesk portal as Security Officer via Call's hyperlink 14. Enter credentials 15. Open Call via homepage 16. Respond to Call 17. Share Call with Supervisor/Administrator 18. Sign out
		Supervisor/Administrator Analysis in: 04 bekijken gedeelde melding	19. Access TOPdesk portal as Supervisor/Administrator via Call's hyperlink 20. Enter credentials 21. View shared Call[2] 22. Sign out
		Support Analysis in: 05 afhandelen en sluiten melding	23. Access TOPdesk backend as Support 24. Enter credentials 25. Open Call via First Line Call overview 26. Escalate and deescalate Call 27. Create Knowledge Item 28. Translate Knowledge Item to English 29. Save Knowledge Item 30. Close Call 31. Send closing e-mail 32. Sign out
2	TOPdesk for processing sensitive information relating to device, incident and application management and complaint handling	Security Officer Analysis in: 06 ARBO aanvraag	1. Access TOPdesk portal as Security Officer 2. Enter credentials 3. Create RfC via SSP, including sensitive personal data in open text field 4. Submit RfC 5. Sign out

[2] As the Call was accessed through the hyperlink, it opened directly without having to access/search for it in the First Line Call overview.

		Support Analysis in: 07 ARBO aanvraag niet gevonden	6. Access TOPdesk backend as Support 7. Enter credentials 8. Open and view RfC via Simple Changes overview 9. Sign out
		Supervisor/Administrator Analysis in: 08 ARBO aanvraag goedkeuren	10. Access TOPdesk backend as Supervisor/Administrator 11. Open RfC via via Simple Changes overview 12. Assign RfC to Supervisor/Administrator 13. Approve RfC 14. Forward RfC to supplier 15. Change RfC status to 'Implemented' 16. Close RfC 17. Send closing e-mail 18. Sign out
3	TOPdesk as system for incident management (handling of information security incidents and personal data breaches)	Safety Coordinator Analysis in: 09 melden datalek	1. Access TOPdesk portal as Safety Coordinator 2. Enter credentials 3. Open in SSP "melding vermissing/diefstal apparatuur of data" 4. Enter databreach notification, attach police report and drivers license. 5. Submit ticket 6. Sign out **Organisation received mail about submitted report.**
		Security officer Analysis in: 10 datalek niet gevonden	7. Access TOPdesk backend as Security Officer 8. Enter credentials 9. Open and view list with card to process databrach **card was not visible**

			10. Sign out
		Support Analysis in: 11 datalek niet gevonden	11. Access TOPdesk backend as Support 12. Enter credentials 13. Open and view list with card to process databrach **card was not visible** 14. Sign out
		Supervisor/Administrator Analysis in: 12 datalek niet gevonden	15. Access TOPdesk backend as Supervisor/Administrator 16. Enter credentials 17. Open and view list with card to process databrach **card was not visible** 18. Sign out
		Administrator of organisation investigated the missing databreach from their admin account. Nobody was assigned to process the data breach, probably due to a mixup of authorisations in the flow while creating the test accounts. Manually registered ticket number of the databreach.	
		Security officer Analysis in: 17 afhandelen datalek	19. Access TOPdesk backend as Security Officer 20. Enter credentials 21. Search on ticket number of the data breach. 22. Process data breach **additional activities for follow up are created** 23. Close card **TOPdesk prepares notification mail** *24.* Sign out
4	TOPdesk for registration of accidents/inappropriate behaviour in the context of social safety	Support Analysis in: 13 melden aanranding	1. Access TOPdesk portal as support 2. Enter credentials 3. Open in SSP “Melding incident / ongeval /

	TOPdesk within the HR department for the handling of inquiries, integral safety, complaints and confidentiality issues		ongewenste situatie op school (TIMO)" 4. Enter notification of incident. 5. Submit ticket 6. Sign out
		Safety Officer Analysis in: 14 in behandeling nemen aanranding	7. Access TOPdesk backend as Safety Officer 8. Enter credentials 9. Open and view card via 'eerstelijns melding' overview 10. Process card 11. Store card *12.* Sign out
		Supervisor/Administrator Analysis in: 15 melding aanranding niet gevonden	13. Access TOPdesk backend as Supervisor/Administrator 14. Enter credentials 15. Open and view list with cards. **card was not visible (as expected)** *16.* Sign out
5	Admin site: Application and audit logging, the establishment of authorisation and access rights within TOPdesk by organisations.	Supervisor/Administrator Analysis in: 16a admin 1.flows	1. Access TOPdesk backend as Supervisor/Administrator 2. Enter credentials 3. Watch planning view 4. Watch tasks view 5. Walk through of dashboards 6. Walk through of modules and module configurations 7. Watch with web integration embedded movie.
		Continuation Supervisor/Administrator	8. Download used search words

		Analysis in: 16b admin 2	9. Walk through of modules and module configurations 10. Setting, import setting, SaaS settings
		Continuation Supervisor/Administrator Analysis in: 16c status.flows	11. Opening of status.topdesk.com 12. Download logfiles (zip) via 'Menu' 13. Sign off

During testing, a configuration error in the staging environment prevented the other users to view the data breach notification. After intervention by the system administrator of the organisation where the tests were performed, the test could be finalised. No other issues arised during the testing.

The staging environment was configured to send all mails to a shared mailbox at the organisation where the tests were performed. This mails were forwarded as attachments to the investigators.

2.3 Analysis

For analysis the captures of the tests are split into chunks of network traffic. Each chunk contains the network traffic of one user session, from logging in, performing the task(s) to logging out.

The admin site was split into multiple parts:
16a admin 1.flows - walk through of the admin site, including the web integration with YouTube.
16c status.flows – continuation of the walk through, including opening the external topdesk services status page.
16b admin 2.flows – remainder of the walk through of the admin site, no external links openend.

The captures of the network traffic (flow files) were analysed with a standard script. This script presents and summarizes the traffic in several ways and enables searching the traffic on key words. The most relevant views are the endpoints the browser connected to and the processed cookies. For each test, these are included in the in the results. Al other views did not reveal any relevant information.

The source code of the mails sent out, were analysed on beacons and other possible additional data processing activities.

The logfiles were each inspected qualitatively for exploring the kind of content and information it contained. Based on the first exploration, string search and word counting was used to get an overview of the types and amounts of data contained in the logfiles.

3 Test results of traffic interception

3.1 Summary

Table 5: Test results - endpoints

	mboutrecht-test.topdesk.net	www.youtube.com	i.ytimg.com	fonts.gstatic.com	www.google.com	jnn-pa.googleapis.com	yt3.ggpht.com	rr4---sn-5hnekn7l.googlevideo.com	status.topdesk.com	dka575ofm4ao0.cloudfront.net	www.recaptcha.net	cdnjs.cloudflare.com	www.gstatic.com	atlassian-cookies--categories.us-east-1.prod.public.atl-	dka575ofm4ao0.cloudfront.net
01 indienen melding	x														
02 afhandelen melding	x														
03 reageren op melding	x														
04 bekijken gedeelde melding	x														
05 afhandelen en sluiten melding	x														
06 ARBO aanvraag	x														
07 ARBO aanvraag niet gevonden	x														

	mboutrecht-test.topdesk.net	www.youtube.com	i.ytimg.com	fonts.gstatic.com	www.google.com	jnn-pa.googleapis.com	yt3.ggpht.com	rr4---sn-5hnekn7l.googlevideo.com	status.topdesk.com	dka575ofm4ao0.cloudfront.net	www.recaptcha.net	cdnjs.cloudflare.com	www.gstatic.com	atlassian-cookies--categories.us-east-1.prod.public.atl-	dka575ofm4ao0.cloudfront.net
08 ARBO aanvraag goedkeuren	x														
09 melden datalek	x														
10 datalek niet gevonden	x														
11 datalek niet gevonden	x														
12 datalek niet gevonden	x														
17 afhandelen datalek	x														
13 melden aanranding	x														
14 in behandeling nemen aanranding	x														

	mboutrecht-test.topdesk.net	www.youtube.com	i.ytimg.com	fonts.gstatic.com	www.google.com	jnn-pa.googleapis.com	yt3.ggpht.com	rr4---sn-5hnekn7l.googlevideo.com	status.topdesk.com	dka575ofm4ao0.cloudfront.net	www.recaptcha.net	cdnjs.cloudflare.com	www.gstatic.com	atlassian-cookies--categories.us-east-1.prod.public.atl-	dka575ofm4ao0.cloudfront.net
15 melding aanranding niet gevonden	x														
16a admin 1.flows	x	x	x	x	x	x	x	x							
16b admin 2	x														
16c status.flows	x			x					x	x	x	x	x	x	x

Table 6: Test results - cookies

	JSESSIONID_PUBLIC	authsession	topdeskidpforwardcacheid	JSESSIONID_ROOT	JSESSIONID_SECURE	mango_window_size	@topdesk/topdesk-app/principal-hash	PREF	VISITOR_INFO1_LIVE	VISITOR_PRIVACY_METADATA	YSC	__Secure-ROLLOUT_TOKEN	_GRECAPTCHA
01 indienen melding	x	x	x										
02 afhandelen melding		x	x	x	x	x							
03 reageren op melding	x	x	x	x	x	x							
04 bekijken gedeelde melding	x	x	x										
05 afhandelen en sluiten melding		x	x		x	x							
06 ARBO aanvraag	x	x	x										
07 ARBO aanvraag niet gevonden		x	x		x	x							
08 ARBO aanvraag goedkeuren		x	x		x	x							
09 melden datalek	x	x	x										
10 datalek niet gevonden		x	x		x	x							
11 datalek niet gevonden		x	x		x	x							

	JSESSIONID_PUBLIC	authsession	topdeskidpforwardcacheid	JSESSIONID_ROOT	JSESSIONID_SECURE	mango_window_size	@topdesk/topdesk-app/principal-hash	PREF	VISITOR_INFO1_LIVE	VISITOR_PRIVACY_METADATA	YSC	__Secure-ROLLOUT_TOKEN	_GRECAPTCHA
12 datalek niet gevonden	x	x	x										
17 afhandelen datalek		x	x		x	x							
13 melden aanranding	x	x	x										
14 in behandeling nemen aanranding		x	x		x	x							
15 melding aanranding niet gevonden		x	x		x	x							
16a admin 1.flows		x	x	x	x	x	x	x	x	x	x	x	
16b admin 2		x		x	x	x							
16c status.flows		x		x	x								x

3.2 Results per test

This section contains the results split per chunk of network traffic.

3.2.1 01 indienen melding

3.2.1.1 01 indienen melding Eindpunten

Referer	Eindpunt	Aantal opvragingen

None	mboutrecht-test.topdesk.net	127
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	33
	mboutrecht-test.topdesk.net	2

3.2.1.2 01 indienen melding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	2	161
	authsession	1	143
	topdeskidpforwardcacheid	2	1

3.2.2 02 afhandelen melding

3.2.2.1 02 afhandelen melding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	367
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	554
	mboutrecht-test.topdesk.net	3

3.2.2.2 02 afhandelen melding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_ROOT	1	634
	JSESSIONID_SECURE	3	923
	authsession	2	897

	mango_window_size	5	6
	topdeskidpforwardcacheid	2	1

3.2.3 03 reageren op melding

3.2.3.1 03 reageren op melding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	497
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	601
	mboutrecht-test.topdesk.net	5

3.2.3.2 03 reageren op melding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	3	175
	JSESSIONID_ROOT	1	634
	JSESSIONID_SECURE	3	923
	authsession	4	1060
	mango_window_size	7	9
	topdeskidpforwardcacheid	4	12

3.2.4 04 bekijken gedeelde melding

3.2.4.1 04 bekijken gedeelde melding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	139

mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	19
	mboutrecht-test.topdesk.net	2

3.2.4.2 04 bekijken gedeelde melding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	3	159
	authsession	2	138
	topdeskidpforwardcacheid	2	1

3.2.5 05 afhandelen en sluiten melding

3.2.5.1 05 afhandelen en sluiten melding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	359
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	1338
	mboutrecht-test.topdesk.net	2

3.2.5.2 05 afhandelen en sluiten melding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	1698
	authsession	2	1677
	mango_window_size	6	7
	topdeskidpforwardcacheid	2	1

3.2.6 06 ARBO aanvraag

3.2.6.1 06 ARBO aanvraag Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	113
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	22
	mboutrecht-test.topdesk.net	2

3.2.6.2 06 ARBO aanvraag Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	3	136
	authsession	2	115
	topdeskidpforwardcacheid	2	2

3.2.7 07 ARBO aanvraag niet gevonden

3.2.7.1 07 ARBO aanvraag niet gevonden Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	191
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	276
	mboutrecht-test.topdesk.net	2

3.2.7.2 07 ARBO aanvraag niet gevonden Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden

mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	468
	authsession	2	442
	mango_window_size	6	7
	topdeskidpforwardcacheid	2	1

3.2.8 08 ARBO aanvraag goedkeuren

3.2.8.1 08 ARBO aanvraag goedkeuren Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	281
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	629
	mboutrecht-test.topdesk.net	2

3.2.8.2 08 ARBO aanvraag goedkeuren Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	911
	authsession	2	888
	mango_window_size	6	7
	topdeskidpforwardcacheid	2	1

3.2.9 09 melden datalek

3.2.9.1 09 melden datalek Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	116

mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	19
	mboutrecht-test.topdesk.net	2

3.2.9.2 09 melden datalek Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	3	136
	authsession	2	116
	topdeskidpforwardcacheid	2	1

3.2.10 10 datalek niet gevonden

3.2.10.1 10 datalek niet gevonden Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	186
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	150
	mboutrecht-test.topdesk.net	2

3.2.10.2 10 datalek niet gevonden Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	337
	authsession	2	321
	mango_window_size	4	5
	topdeskidpforwardcacheid	2	1

3.2.11 11 datalek niet gevonden

3.2.11.1 11 datalek niet gevonden Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	92
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	129
	mboutrecht-test.topdesk.net	2

3.2.11.2 11 datalek niet gevonden Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	222
	authsession	2	203
	mango_window_size	4	5
	topdeskidpforwardcacheid	2	1

3.2.12 12 datalek niet gevonden

3.2.12.1 12 datalek niet gevonden Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	90
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	181
	mboutrecht-test.topdesk.net	2

3.2.12.2 12 datalek niet gevonden Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden

mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	272
	authsession	2	253
	mango_window_size	4	5
	topdeskidpforwardcacheid	2	1

3.2.13 13 melden aanranding

3.2.13.1 13 melden aanranding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	132
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	59
	mboutrecht-test.topdesk.net	2

3.2.13.2 13 melden aanranding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_PUBLIC	3	192
	authsession	2	171
	topdeskidpforwardcacheid	2	1

3.2.14 14 in behandeling nemen aanranding

3.2.14.1 14 in behandeling nemen aanranding Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	225
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	499

	mboutrecht-test.topdesk.net	2

3.2.14.2 14 in behandeling nemen aanranding Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	725
	authsession	2	709
	mango_window_size	4	5
	topdeskidpforwardcacheid	2	1

3.2.15 15 melding aanranding niet gevonden

3.2.15.1 15 melding aanranding niet gevonden Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	355
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	624
	mboutrecht-test.topdesk.net	4

3.2.15.2 15 melding aanranding niet gevonden Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	6	981
	authsession	4	942
	mango_window_size	8	10
	topdeskidpforwardcacheid	4	2

3.2.16 16a admin 1.flows

3.2.16.1 16a admin 1.flows Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	1903
	www.youtube.com	1
	i.ytimg.com	1
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	5155
	mboutrecht-test.topdesk.net	4
www.youtube.com	www.youtube.com	17
	fonts.gstatic.com	4
	www.google.com	1
	i.ytimg.com	20
	jnn-pa.googleapis.com	4
	yt3.ggpht.com	2
	rr4---sn-5hnekn7l.googlevideo.com	21

3.2.16.2 16a admin 1.flows Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	@topdesk/topdesk-app/principal-hash	111	169
	JSESSIONID_ROOT	1	6383
	JSESSIONID_SECURE	2	7061
	authsession	1	7050
	mango_window_size	26	27

	topdeskidpforwardcacheid	2	1
www.youtube.com	PREF	0	12
	VISITOR_INFO1_LIVE	1	17
	VISITOR_PRIVACY_METADATA	1	17
	YSC	1	17
	__Secure-ROLLOUT_TOKEN	1	17

3.2.17 16c status.flows

3.2.17.1 16c status.flows Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	status.topdesk.com	2
status.topdesk.com	dka575ofm4ao0.cloudfront.net	17
	www.recaptcha.net	13
	cdnjs.cloudflare.com	1
	status.topdesk.com	2
	www.gstatic.com	1
	atlassian-cookies--categories.us-east-1.prod.public.atl-paas.net	1
dka575ofm4ao0.cloudfront.net	dka575ofm4ao0.cloudfront.net	1
www.recaptcha.net	www.gstatic.com	4
	www.recaptcha.net	8
	fonts.gstatic.com	8
www.gstatic.com	www.gstatic.com	5
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	15

3.2.17.2 16c status.flows Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_ROOT	0	15
	JSESSIONID_SECURE	0	15
	authsession	0	15
www.recaptcha.net	_GRECAPTCHA	3	2

3.2.18 16b admin 2.flows

3.2.18.1 16b admin 2.flows Eindpunten

Referer	Eindpunt	Aantal opvragingen
mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	811
None	mboutrecht-test.topdesk.net	256

3.2.18.2 16b admin 2.flows Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_ROOT	0	1067
	JSESSIONID_SECURE	1	1067
	authsession	1	1059
	mango_window_size	3	3

3.2.19 17 afhandelen datalek

3.2.19.1 17 afhandelen datalek Eindpunten

Referer	Eindpunt	Aantal opvragingen
None	mboutrecht-test.topdesk.net	364

mboutrecht-test.topdesk.net	mboutrecht-test.topdesk.net	1043
	mboutrecht-test.topdesk.net	2

3.2.19.2 17 afhandelen datalek Cookies

Eindpunt	Naam cookie	Aantal keer gezet	Aantal keer gezonden
mboutrecht-test.topdesk.net	JSESSIONID_SECURE	3	1408
	authsession	2	1385
	mango_window_size	10	11
	topdeskidpforwardcacheid	2	1

4 Logging

Administrators can download a compressed package with logfiles. This package contains several types of logfiles.

4.1 Access logs

This log contains the authentication actions. A typical log line looks like this:

```
[2025-07-15 12:54:29,694]          | [AUTH] User: ENBT2 verified by
TopdeskAuthenticationProvider in the /tas/secure realm from remote host
185.238.129.232
```

The IP-address is the external IP-address from where the user connected, ENBT2 is the username.

4.2 Error logs

These logs contain warnings and errors. The use of identifiers like usernames or UIDs is not

```
[2025-07-15 11:20:12,525] WARN  (SEOG) Finished rendering context c32
(https://mboutrecht-
test.topdesk.net/tas/secure/mango/window/3?t=1752571211242) in 591 ms.
1752571095088 WebSession[5495; user=SEOG;
browserInformation=BrowserInformation{browser="Firefox"; version=140 on
```

```
[2025-07-15 12:42:14,172] WARN  Failed to do a logout with session cookie
JSESSIONID_SECURE
[2025-07-15 12:42:14,679] WARN  While logging out, PasslayerSessionId
attribute was not found in TAS session. Passlayer logout not initated.
[2025-07-15 12:42:15,940] WARN  User IdentifierValue[874952c0-5cb3-41aa-
9b58-829413dae240] could not be found; needsLogin=true,
allowArchived=false
[2025-07-15 12:42:16,317] ERROR Unknown chat tool: null
```

Some of the lines in these logs contain the filenames of the uploaded files:

```
[2025-07-15 11:38:55,505] WARN  File path is not an URI, treating it as a relative
String path instead: incident/2025/7/M250715 0001/rijbewijs.pdf
```

4.3 Import logs

These logs contain summaries of the import actions. In the tested environment this was the importing of the user database. These don't contain personal data, but do contain categories and counts:

```
Couple "Medewerkers_MBO_Utrecht" -> "person"
                MODIFY     SUCCESS 0      IGNORED 649     FAILED 0
                ADD        SUCCESS 0      IGNORED 0       FAILED 0
                DELETE     SUCCESS 0      IGNORED 0       FAILED 0
                LEFTOUT    SUCCESS 0      IGNORED 0       FAILED 0
```

4.4 Application logs

These contain a trace of the actions of the application. This includes the logging of database queries. Many of these are not comprehensible without deep knowledge of the database structure of TOPdesk or access to the source code.

The logged database queries are in many cases linked to the logged in user. For example test user ENBT2 had over 6000 database queries logged with the username in it.

```
$ grep ENBT2 log.*.txt | grep SELECT | wc -l
5136
$ grep ENBT2 log.*.txt | grep select | wc -l
1242
$ grep ENBT2 log.*.txt | grep select | grep DEBUG | wc -l
1229
$ grep ENBT2 log.*.txt | grep SELECT | grep DEBUG | wc -l
227
$ grep ENBT2 log.*.txt | grep SELECT | grep INFO | wc -l
4909
$ grep ENBT2 log.*.txt | grep select | grep INFO | wc -l
8
```

There doesn’t seem to be a consistent policy why some of these queries are logged with loglevel DEBUG and others INFO, nor a consistent policy of the registration of usernames at the various loglevels:

winfried $ grep -i arbo *

log.2025-07-15_1321.txt:[2025-07-15 12:46:12,843] INFO 67|ADRL |24831 /3983#newchange_card:dataSave 5 out of 31 event(s) triggered for NEW: [1 Aanmaken Voorlopige Wijzigingsaanvraag, Toewijzing sjabloon Ws 068-ARBO aanvraag, Toewijzing sjabloon Ws 077/8/9-thuiswerkfaciliteit, Toewijzing sjabloon Ws 080-Extra opening gebouw, Toewijzing sjabloon Ws 081-ma-di-za opening gebouw] | com.topdesk.event.EventBuilder
log.2025-07-15_1321.txt:[2025-07-15 12:46:13,085] DEBUG 527|ADRL | /3983#newchange_card:dataSave/0#execute-events/0#execute-actions Scheduling 3 email action(s) for card W250715 0002: [Aanbieden autorisatieverzoek -> ARBO-Coörd., Aanmelden voorl. wijzigingsaanvraag -> aanmelder, Mailbericht ontvangst aanvraag ARBO -> ARBO-coörd.] | com.topdesk.actionevent.action.ActionBuilder
log.2025-07-15_1321.txt:[2025-07-15 12:46:13,086] DEBUG 530|ADRL | /3983#newchange_card:dataSave/0#execute-events/0#execute-actions/2#action-builder Executing email action Aanbieden autorisatieverzoek -> ARBO-Coörd. | com.topdesk.actionevent.action.EmailActionBuilder
log.2025-07-15_1321.txt:[2025-07-15 12:46:14,212] DEBUG 530|ADRL | /3983#newchange_card:dataSave/0#execute-events/0#execute-actions/2#action-builder Executing email action Mailbericht ontvangst aanvraag ARBO -> ARBO-coörd. | com.topdesk.actionevent.action.EmailActionBuilder
log.2025-07-15_1321.txt:Subject: Aanvraag voor ARBO/Werkplekadvies ontvangen in Topdesk W250715 0002 - Aanvraag
log.2025-07-15_1321.txt:[2025-07-15 12:46:14,259] DEBUG 527|ADRL | /3983#newchange_card:dataSave/0#execute-events/0#execute-actions Executing Aanbieden autorisatieverzoek -> ARBO-Coörd. for W250715 0002 | com.topdesk.actionevent.action.XfgUserInteractionHandler
log.2025-07-15_1321.txt:[2025-07-15 12:46:14,909] DEBUG 527|ADRL | /3983#newchange_card:dataSave/0#execute-events/0#execute-actions Executing Mailbericht ontvangst aanvraag ARBO -> ARBO-coörd. for W250715 0002 | com.topdesk.actionevent.action.XfgUserInteractionHandler
log.2025-07-15_1321.txt:<hea...',N'Mailbericht ontvangst aanvr...',NULL,N'noreply@mboutrecht.nl',0,0,'',NULL,1,N'2025-07-15 12:46:15',NULL,N'm.vande.wiel@mboutrecht.nl',0,0,NULL,3,N'Aanvraag voor ARBO/Werkplek...',N'2025-07-15 12:46:14',0,0,0,N'2025-07-15 12:46:15',1) T[484230,MC,WR,C[131,SR]] | com.topdesk.database.connection.jdbc.JDBCDatabase

[ ]

Some of the logged database queries, log the values of the parameters for the queries, while other queries only log the parameter name, but not its value. There doesn't seem to be to a policy for including the values of the parameters, nor does it correlate to the loglevel.

```
INFO   295|TOPDESKACTIEREEKS|24860   /3999#API/0#newchange_card:dataSave
UPDATE [dbo].[change] SET [ref_type_name]=N'Standaard
wijziging',[ref_req_authoperator_name]=N'Marjon van de
Wiel',[uidwijzig]='59c3c48d-45b2-4eb8-8f7c-aa2a3f758070',[typeid]='85be3c61-
8403-501e-9bf2-659975ea1e8d',[subcategoryid]='9d832d3c-c5de-45e5-bcdf-
898bc5a8b2ba',[ref_subcategory_name]=N'Werkplek',[req_authoperatorid]='1754fc
36-37b2-45ea-a70c-ad8f1154803e',[ref_req_authperson_name]=N'Geen autorisatie
direct lei...',[briefdescription]=N'Aanvraag ARBO
advies/middel',[req_authpersonid]='eb155160-26b4-4e63-aa9b-
16adc81498cc',[ref_category_name]=N'Gebouwen en
facilitair',[templateid]='769e7677-fc50-40e5-8833-
d83212d3392f',[plannedimpldate]=N'2025-07-15
12:46:00',[entityversion]=1,[mayauthorize_rfc]=1,[plannedfinaldate]=N'2025-07-15
12:46:00',[ref_operatorname]=N'Servicedesk
F&H',[currentphase]=2,[plannedstartdate]=N'2025-07-15
12:46:00',[categoryid]='50c90fa1-4142-5e94-ba6b-
127db2154f2c',[operatorgroupid]='2ec25510-34f1-4cc4-93d4-
b6f4b47f3300',[submitdate]=N'2025-07-15 12:46:00',[operatorid]='2ec25510-34f1-
4cc4-93d4-b6f4b47f3300',[datwijzig]=N'2025-07-15 12:46:17' WHERE
([unid]='dc204b4b-a861-40e5-9e34-65f5c68c060d') AND ((1=0) OR (([entityversion]
IS NULL) OR ([entityversion]=0))) T[484350,MC,UC,C[871,SR]]              |
com.topdesk.database.connection.jdbc.JDBCDatabase
log.2025-07-15_1321.txt:[2025-07-15 12:46:17,769]
```

These logs also contain the filenames of the uploaded files, both at loglevel DEBUG and at loglevel INFO:

```
log.2025-07-15_1203.txt:[2025-07-15 11:12:59,853]
DEBUG   269|ENBT2      |22356          %%%% fileName: \\eu2naac01-
5231.eu2.saas.loc\eu2c07customerdata01\ts005532\Upload\incident\2025
\7\M250715 0001\rijbewijs.pdf              |
nl.ogdsoftware.tas.documentmanager.DocumentDispatcherServlet
```

log.2025-07-15_1321.txt:[2025-07-15 13:10:54,931] INFO 269|WDTS |26393 Storing Test_Aangifte_verkeersovertreding_Arnold_Roosendaal_123098567.docx to \\eu2naac01-5231.eu2.saas.loc\eu2c07customerdata01\ts005532\Upload\change\2025\7\W2507150003\Test_Aangifte_verkeersovertreding_Arnold_Roosendaal_123098567.docx | com.topdesk.utils.fileupload.UploadDirectory

5 Data Subject Access Request

Below is a copy of the original Data Subject Access Request and screenshots of the communication regarding the Data Subject Access Request with Cloudflare and Microsoft respectively. Cloudflare's and Microsoft's full responses are available at the request of SURF.

5.1 Request

Figure 1: Copy of original Access [3]

In deze periode hebben deze gebruikers vanaf de IP-adressen IPv4 85.238.129.232 en IPv6 2a10:3781:1fb::/32 verbinding gemaakt. Dit zijn vaste IP-adressen voor persoonlijk gebruik.

Deze gebruikers hebben contact gelegd met de omgeving: mboutrecht-test.topdesk.net. Wij hebben de identiteit van de gebruikers vastgesteld en hebben vastgesteld dat de genoemde IP-adressen inderdaad in gebruik zijn bij de genoemde gebruikers.

Daarnaast vragen de gebruikers:

Voor welk doel u de persoonsgegevens van deze betrokkenen (heeft) gebruikt.
Aan welke organisaties of soorten organisaties u de persoonsgegevens van deze betrokkenen eventueel heeft doorgegeven.
Of u de persoonsgegevens van deze betrokkenen heeft doorgegeven aan een land buiten de Europese Economische Ruimte (EER) of aan een internationale organisatie. En, zo ja, welke maatregelen u heeft genomen om zorgvuldig met de persoonsgegevens om te gaan (passende waarborgen voor doorgifte).
Hoe lang u de persoonsgegevens van deze betrokkenen bewaart.
Hoe u aan de persoonsgegevens van deze betrokkenen bent gekomen, als zij hun gegevens niet zelf aan u hebben doorgegeven.
Of u automatische besluiten over mensen neemt, inclusief profilering. En zo ja, waarom u dat doet, op basis van welke logica en welke gevolgen dat voor deze betrokkenen kan hebben.

Kunt u deze informatie ook opzoeken?

In verband met de termijnen van de AVG, verzoek ik u om binnen een maand deze gegevens op te zoeken. Mochten er problemen bij het halen van deze termijn of mocht de afhandeling onverhoopt langer duren, dan horen wij dat graag binnen 2 weken, zodat wij aan onze verplichtingen kunnen voldoen.

Kunt u bij het beantwoorden van dit verzoek een overzicht geven van de bestanden waarin u gezocht heeft en ook een negatief zoekresultaat vermelden?

Veel dank en met vriendelijke groet,

Eleonora van Eijk & Patrick de Klein
MBO Utrecht
Australiëlaan 25
3526AB Utrecht

[3] An English translated version of the request is available at the request of SURF.

5.2 Response

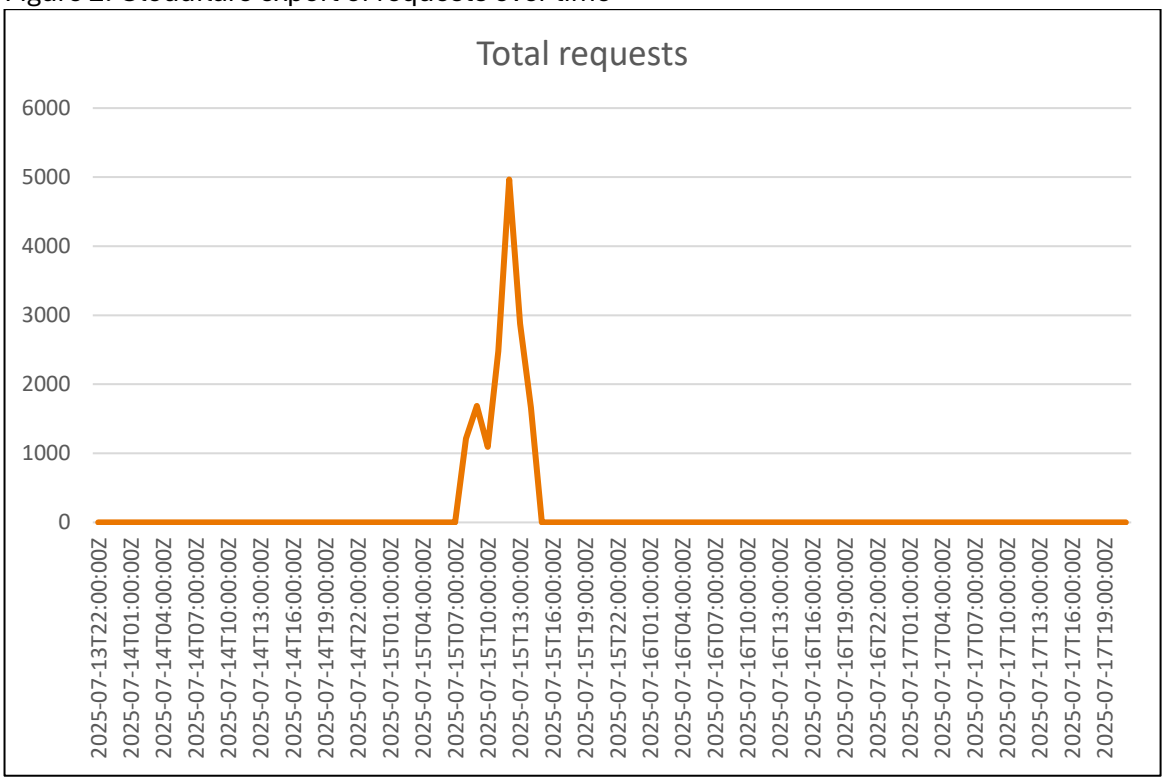
5.2.1 Provided response – Cloudflare

Screenshot 1: Excerpt of Cloudflare's export of first 1000 lines of traffic data[4]


```
{
  "data": {
    "viewer": {
      "zones": [
        {
          "httpRequestsAdaptive": [
            {
              "cacheStatus": "dynamic",
              "clientIP": "185.238.129.232",
              "clientRequestHTTPHost": "mboutrecht-test.topdesk.net",
              "clientRequestPath": "/tas/secure/mango/image",
              "datetime": "2025-07-15T14:19:20Z",
              "edgeResponseStatus": 200,
              "rayName": "95f9e4eaa9579deb",
              "userAgent": "Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:140.0) Gecko/20100101 Firefox/140.0"
            },
            {
              "cacheStatus": "dynamic",
              "clientIP": "185.238.129.232",
              "clientRequestHTTPHost": "mboutrecht-test.topdesk.net",
              "clientRequestPath": "/tas/secure/mango",
              "datetime": "2025-07-15T14:19:19Z",
              "edgeResponseStatus": 200,
              "rayName": "95f9e4e3e9b89deb",
              "userAgent": "Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:140.0) Gecko/20100101 Firefox/140.0"
            },
            {
              "cacheStatus": "dynamic",
              "clientIP": "185.238.129.232",
              "clientRequestHTTPHost": "mboutrecht-test.topdesk.net",
              "clientRequestPath": "/tas/secure/mango",
              "datetime": "2025-07-15T14:19:17Z",
              "edgeResponseStatus": 200,
              "rayName": "95f9e4d8fa5f9deb",
              "userAgent": "Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:140.0) Gecko/20100101 Firefox/140.0"
            },
            {
              "cacheStatus": "dynamic",
              "clientIP": "185.238.129.232",
              "clientRequestHTTPHost": "mboutrecht-test.topdesk.net",
              "clientRequestPath": "/tas/secure/mango",
              "datetime": "2025-07-15T14:18:49Z",
              "edgeResponseStatus": 200,
              "rayName": "95f9e4292e089deb",
              "userAgent": "Mozilla/5.0 (Windows NT 10.0; Win64; x64; rv:140.0) Gecko/20100101 Firefox/140.0"
```

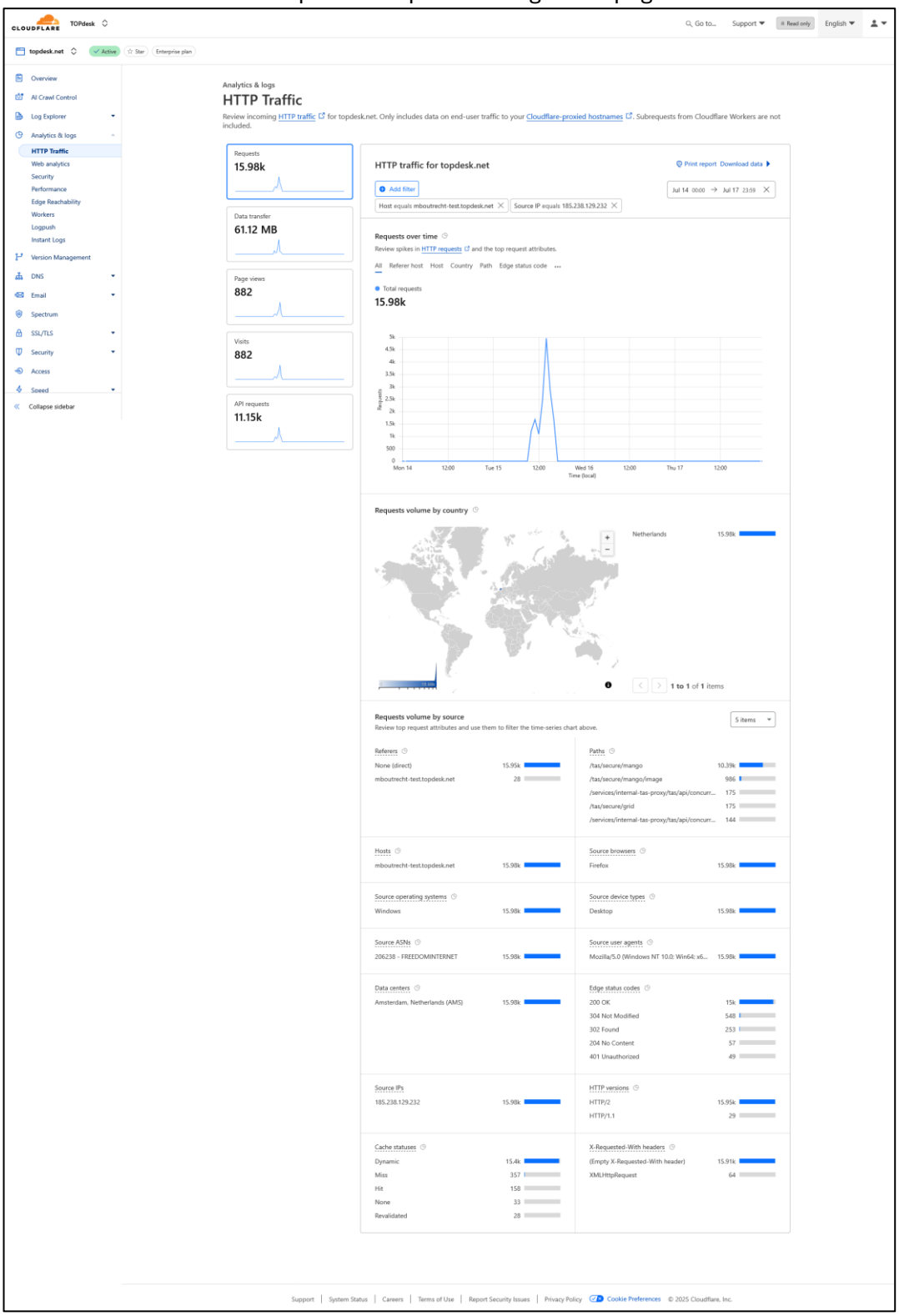

[4] The full export is available at the request of SURF.

Figure 2: Cloudflare export of requests over time[5]



[5] The full export is available at the request of SURF.

Screenshot 2: Cloudflare http traffic export - Management page



5.2.2 Provided response – Microsoft

The full e-mail conversation between TOPdesk and Microsoft (d.d. 26-09-2025 – 10-10-2025) is confidential and can only be shared with TOPdesks approval.