

GDPR: When the Right to Access Personal Data Becomes a Threat

Luca Bufalieri, Massimo La Morgia, Alessandro Mei, Julinda Stefa

Speaker

Massimo La Morgia

lamorgia@di.uniroma1.it



SAPIENZA
UNIVERSITÀ DI ROMA

The General Data Protection Regulation

- Inbox Squarespace is ready for the GDPR - Stores GDPR goes into effect on May 25th /> The General Data Protection Regulation, or GDPR, creates a single set of rules to modernize data protection across Europe.
- Inbox We've Updated Our Privacy Policy - Regulation (GDPR) coming into effect on May 25th 2018. GDPR creates a single set of rules to modernize data protection across Europe.
- Inbox We've updated our Privacy Policy - UK (GDPR). What is GDPR?
- Inbox Update Your Newsletter Preferences - ('GDPR') is coming into effect, and you've probably already gotten a few emails about this from other companies.
- Inbox Updates to Spotify Privacy Policy - the ('GDPR') We have always strived to provide you with clear and simple information about the personal data we collect and how we use it.
- Inbox Updates to our Privacy Statement - Regulation (GDPR) the new European Union privacy laws, SEEK has made relevant changes to our privacy statement.
- Inbox We've updated our Privacy and Cookie Policy. Here's what you need to know... - Regulation (GDPR) law takes effect. In a nutshell, it gives individuals more control over their personal data.
- Inbox Act now or lose all this good stuff - View online <http://view.i.tpxpress.co.uk/?qs=1>
- Inbox An update on our Privacy Policy - Regulation (GDPR) which comes into effect on the 25th May 2018. At Papa John's, we are committed to protecting your personal data and ensuring it is used fairly and lawfully.
- Inbox You're not alone... - a-gdpr-intervention] A GDPR intervention [<https://www.lawscot.org.uk/news-and-events/news/a-gdpr-intervention>
- Inbox You're in control - Your partial postcode: 9AP Royal Bank of Scotland If you are reading this message, either your email or your mobile phone.
- Inbox Improvements to our Privacy Policy and Privacy Controls - Regulation (GDPR) takes effect across the European Union. Designed to harmonize data protection rules and give individuals more control over their personal data.
- Inbox Notice of Terms of Service and Policy Updates - Regulation (GDPR) which goes into effect on May 25, 2018. We've posted these updates to our website and will be sending them to you via email.
- Inbox Survey of EU/devolved powers, CPD events and more - under-gdpr] GDPR: What's new for controllers and processors? [<https://www.lawscot.org.uk/news-and-events/news/gdpr-whats-new-for-contro>
- Inbox Mr Callery, data privacy law is changing - Mr Callery, data privacy law is changing

GDPR



Data Protection
Officer (DPO)



Compliance



25 May 2018



Data Breaches



Personal Data

Which is the actual deployment of the [GDPR](#)?

How they identify the requester?

How they transmit the personal data?

Do they transmit all the data?



The top 500 sites on the web ?

334 Web sites

[Global](#)[By Country](#)[By Category](#)

Adult	7.5%	Health	1.8%	Science	3.9%
Arts	5.1%	Kids and Teens	2.8%	Shopping	15.6%
Business	7.8%	News	7.2%	Society	6%
Computers	9.6%	Recreation	12.9%	Sports	5.4%
Games	8.4%	Reference	5.7%		

Chapter 1

Performing the Data Subject Access Request

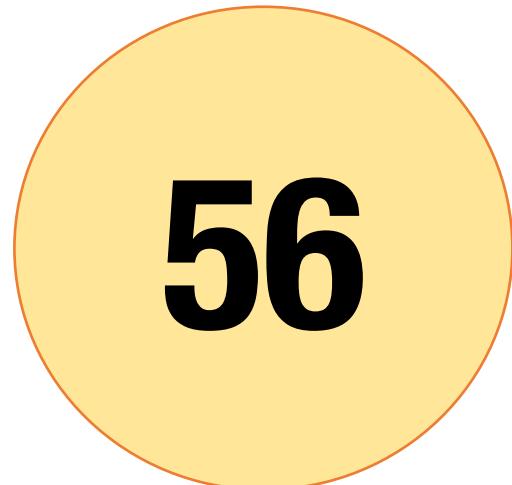
Privacy Policy Compliance

The controller shall provide the data subject the following information:

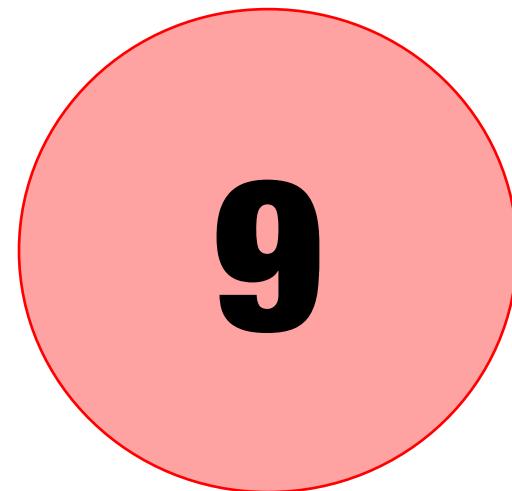
- The contact details of the DPO
- The existence of the right to request data



Everything OK!



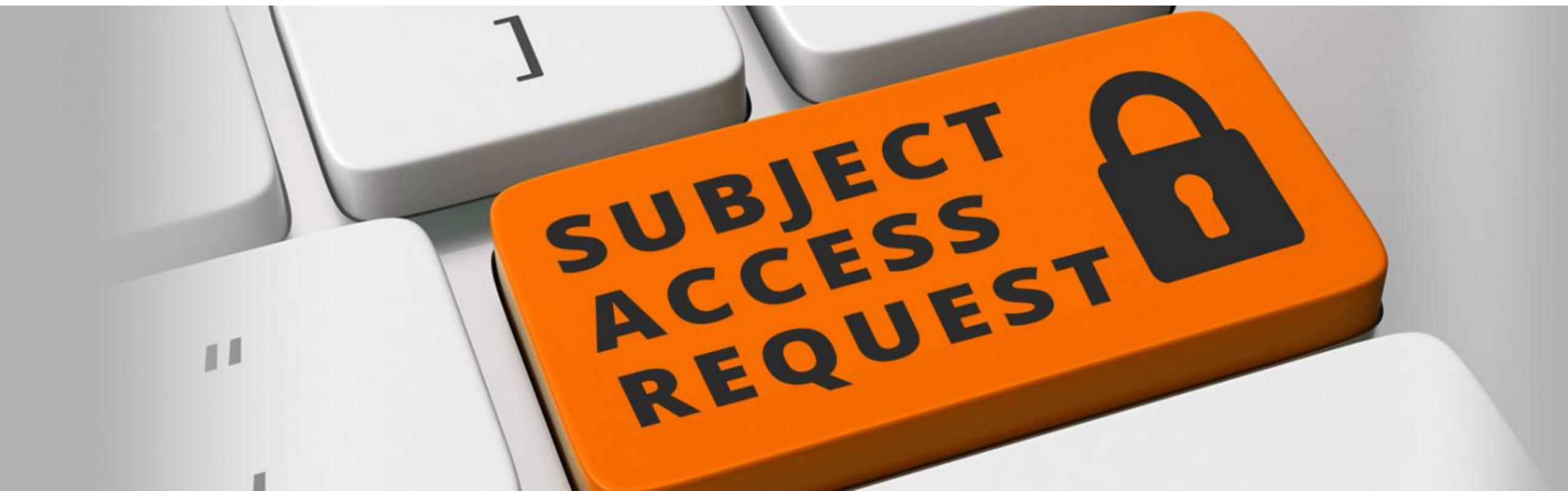
No user rights (53)
Or
No Contact point (3)



NO GDPR (6)
Or
PP not working (3)

Request methodology

- Email (66%)
- Compile Form and send it via email (3.3%)
- Online Form (28.9%)
- Phone call or standard mail (1.81%)

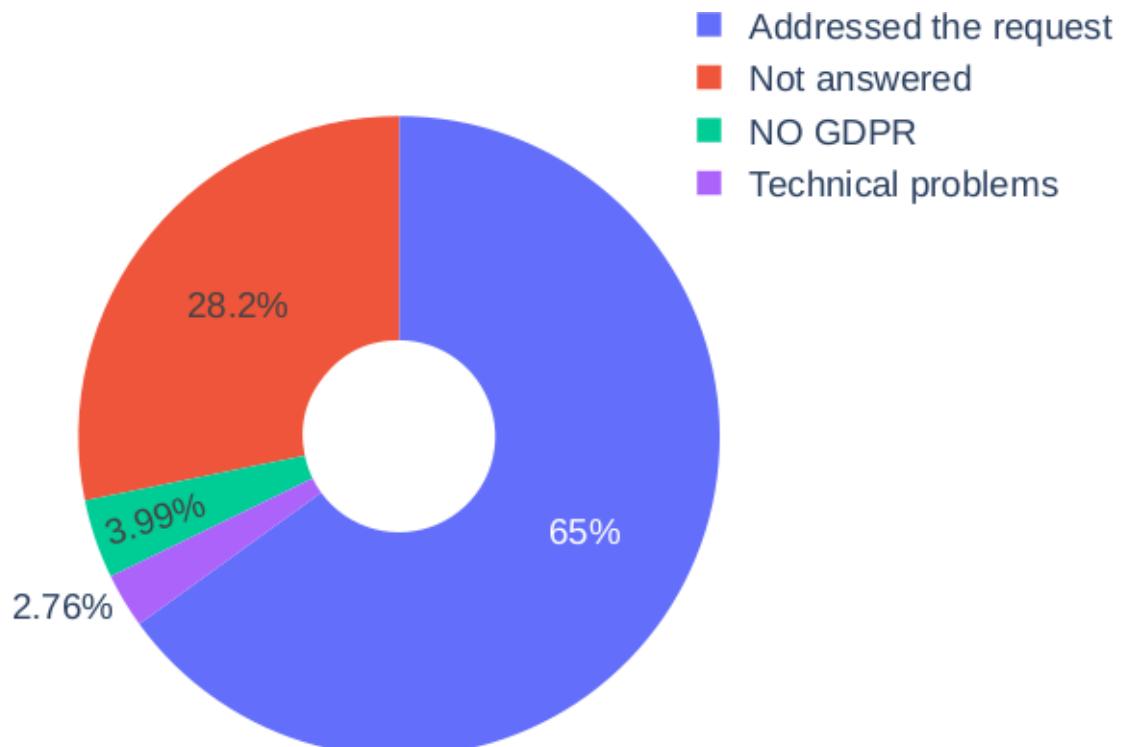


User Identification

- Identity document (33)
 - Knowledgeable Questions (19)
 - Cookie (3)
 - Sworn declaration (3)
 - Email confirmation (21)
 - Phone call (3)
- Trust the email address of the requester (51)



Response Obtained



	GDPR Rights	NO GDPR Rights
Addressed the request	195	17
Did not answer	69	23
Refused	0	13
Total	264	53

Response time

Article 12

The controller shall provide information within one month of receipt of the request. That period may be extended by two further months where necessary.

Average response time: 16.4 days

17.54% answered the same day

89.15% answered in time



Data Format

No standard response format

- Email body
- PDF
- Standard mail
- Json
- txt
- HTML
- Docx
- XML



Data Format

Article 20

The data subject shall have the right to access to the personal data **in a structured, commonly used and machine-readable format.**

52.7%

Probably the same way to handle the data access and data portability requests



Information (*not*) achieved

alue8,0,,15, Foo; CR LF

ount,1,9,0,,; CR LF

1,1,1024,1,0,3,0,0,1,60, HDM-1,,0,,0,,; CR LF

_FRQ,3,1e9,0,,; CR LF

OH¤SOH°œ@SOH; | ª SOHèO£ SOH_ÃžSOH«vÝSOHþ
M|£ SOH4«\\$SOHáš; SOHók¢ SOH'í¥SOH¶š@SOH?™
HK~\\$SOHXL F

; SOH—° SOH°%£ SOHÝb `` SOH) þ-SOH< “—SOHóù ; S
þÝSOH> [¤ SOH, Y\\$SOHPn@SOHRH@SOHE1@SOHA® S

¤\\$SOH; *\\$SOH£EM¢ SOHá“œSOHixÝSOHDC3“£SOH
H¶EM|SOH' * SOHSIÁžSOH·y£SOH—¶¤SOHOÍÝSOH
¤SOHJG¤SOHISOHu¤SOH_Ñ¤SOHBELDC1@SOH® ; ¥\\$

RESPONSE READABILITY

; SOH>ö ; SOHü†¤¤SOHZU SOH¥/¥SOHZO¤SOHñ+¤¤



Information (*not*) achieved

- Google Analytics
- Turn
- Prime Real Time
- Google Adwords
- Yahoo
- Doubleclick
- ClickPoint
- Criteo
- Zanox
- Facebook
- Amazon
- Microsoft
- Adform
- Rocketfuel
- Turbo Adv
- AppNexus
- HiMedia
- Adgo!
- Webperformance

Tradelab
Quantcast
Blogo
Outbrain
Emailing Network
Chameleon
Valuedem
Webads
MediaMob
Clickpoint
Ketchup ADV
Adpulse
Italia Online

Only 6 data controllers provide data about 3rd party trackers.

On average private news media use more than 30 third-party services

Chapter 2

Privacy concerns & experiments

Sharing data

2

No TLS!

Sniffing or man in the middle attacks

Sharing data

82

TLS

+

Plain file

Compromised server Or Incorrect recipient

Sharing data

20

TLS

+

Encrypted data

Password send on the same email

Sharing data

3

TLS

+

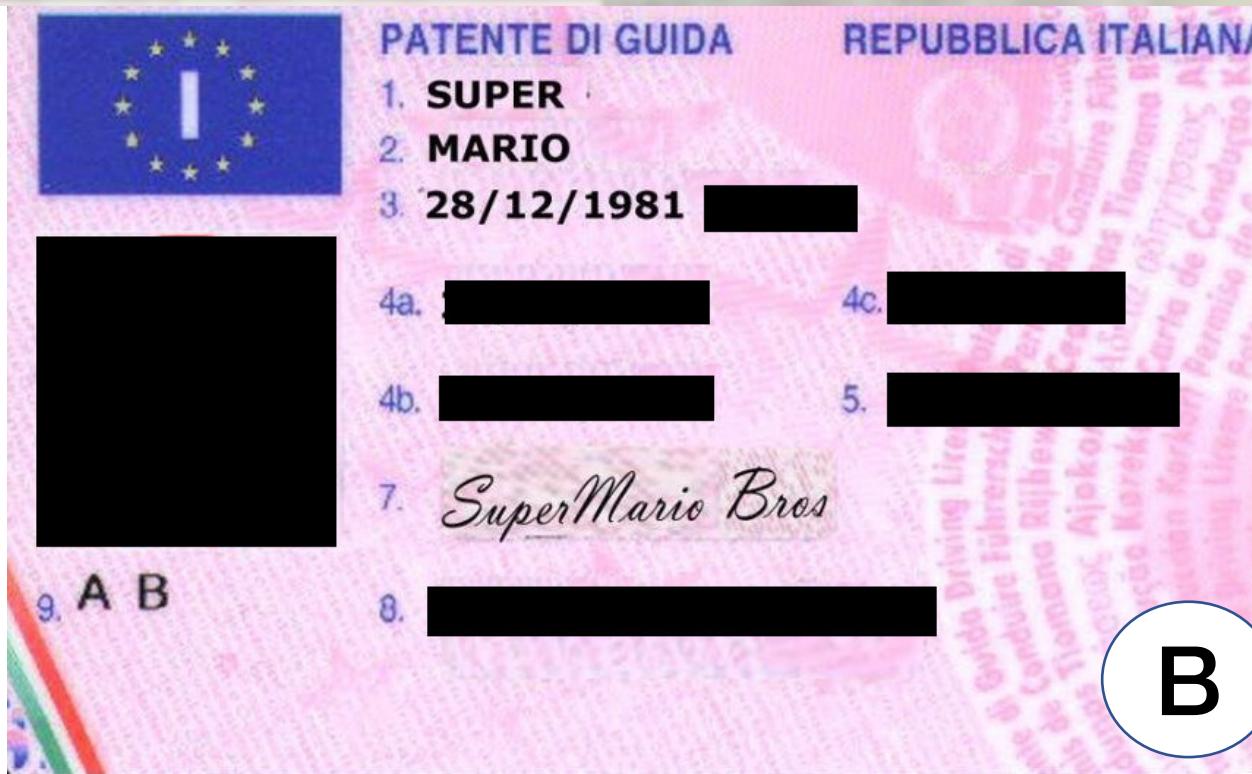
Encrypted data

+

Different channel

Same pattern to create the password

Tampering the Identity card



Tampering the Identity card

21 out of 25 accepted the
Pixelized + obfuscated document

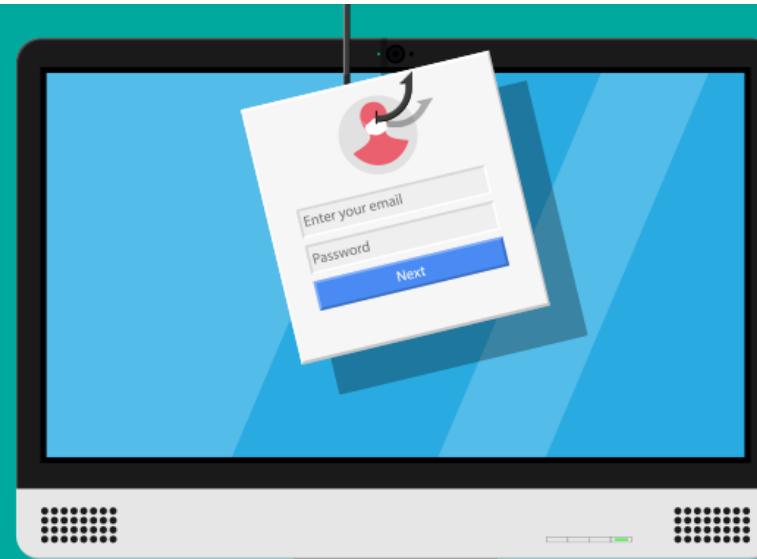
The remaining **4** accepted
the **pixelized** one

Email as authentication

51 data controllers based the user identification on the email address

johndoe@provider.com

johnndoe@provider.com



Email as authentication

19 out of 51 sent us the data

1 data controller **deleted the account**



Data escalation

Starting from few initial information, attackers can build up a **chain of request** and **jeopardize** the privacy of the user.





The end

Thank you for your attention!