

This additional document contains the descriptions and examples of the newly proposed 11 common privacy weaknesses that have not covered in the existing CWEs (see Section 5 in the Common Privacy Weaknesses and Vulnerabilities in Software Applications manuscript for more details). Their detailed information is presented below.

Table 1: An example of unauthorised personal data modification weakness.

<p><b>Subcategory:</b> Insecurity</p> <p><b>Class:</b> Allowing unauthorised actors to modify personal data</p> <p><b>Name:</b> Unauthorised personal data modification</p> <p><b>Description:</b> The software lacks mechanisms to protect personal data from actors who are not authorised to modify personal data.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused by missing the implementation of personal data protection mechanisms to restrict actors who can modify personal data.</p> <p><b>Common consequence:</b> Scope: Integrity. Impact: Unauthorised modification. Note: This weakness violates user privacy as the personal data is modified without authorisation and user awareness. This may also affect the processing that uses this personal data in the software.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Evaluate parts in software that involve with modifying personal data and check whether the protection mechanisms are applied.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Implement an authorisation mechanism. Description: The software development team should implement a proper personal data protection mechanism to allow only authorised actors to modify personal data.</p> <p><b>Demonstrative example:</b> Issue 83010 in Chrome reports that the system allows the attackers to access and modify personal data via a malicious extension. The affected data includes saved passwords, preferences and permissions. References: <a href="https://bugs.chromium.org/p/chromium/issues/detail?id=83010">https://bugs.chromium.org/p/chromium/issues/detail?id=83010</a> and <a href="https://src.chromium.org/viewvc/chrome/branches/742/src/chrome/common/extensions/extension.cc?r1=86315&amp;r2=86314&amp;pathrev=86315">https://src.chromium.org/viewvc/chrome/branches/742/src/chrome/common/extensions/extension.cc?r1=86315&amp;r2=86314&amp;pathrev=86315</a>.</p>
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<pre> # Line 2709 2709 bool Extension::HasHostPermission(const GURL&amp; url) const { 2710   for (URLPatternList::const_iterator host = host_permissions().begin(); 2711        host != host_permissions().end(); ++host) { 2712 2713 2714 2715 2716 2717 2718 2719   if (host-&gt;MatchesUrl(url)) 2720     return true; 2721   } </pre>	<pre> Line 2709 bool Extension::HasHostPermission(const GURL&amp; url) const {   for (URLPatternList::const_iterator host = host_permissions().begin();        host != host_permissions().end(); ++host) {     // Non-component extensions can only access chrome://favicon and no other     // chrome:// scheme urls.     if (url.SchemeIs(chrome::kChromeUIScheme) &amp;&amp;         url.host() != chrome::kChromeUIFaviconHost &amp;&amp;         location() != Extension::COMPONENT)       return false;      if (host-&gt;MatchesUrl(url))       return true;   } </pre>
<pre> # Line 2785 2792   return false; 2793 } 2794 2795 2796 2797 2798 2799 // If a script is specified, use its matches. 2800 if (script) 2801   return script-&gt;MatchesUrl(page_url); </pre>	<pre> Line 2792     return false;   }    if (page_url.SchemeIs(chrome::kChromeUIScheme) &amp;&amp;       !CanExecuteScriptEverywhere())     return false;    // If a script is specified, use its matches.   if (script)     return script-&gt;MatchesUrl(page_url); </pre>

Figure 1: An example of unauthorised personal data modification in Chrome (Issue 83010).

Table 2: An example of missing user privacy preference settings weakness.

<p><b>Subcategory:</b> Exclusion</p> <p><b>Class:</b> Not showing options asking for user privacy preferences</p> <p><b>Name:</b> Missing user privacy preference settings</p> <p><b>Description:</b> The software does not show options asking the users to set their privacy preferences (e.g. audience who can view their profiles). The users should be able to select how they prefer to manage their user privacy preference settings.</p> <p><b>Mode of introduction:</b> Phase: Architecture and Design. Description: This weakness is caused by not considering user privacy preference settings in the architecture and design phase.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: Users cannot determine their user privacy preferences in the software.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Evaluate the functions related to personal data processing.</p> <p><b>Potential mitigation:</b> Phase: Architecture and Design. Strategy: Consider user privacy preferences. Description: The software development team should consider which functions in the system need to provide options for users to determine their user privacy preferences.</p> <p><b>Demonstrative example:</b> Issue SAK-21599 in Sakai repository (e-learning platform) reports that the software does not show options for users to set privacy status preferences in selected courses. References: <a href="https://jira.sakaiproject.org/browse/SAK-21599">https://jira.sakaiproject.org/browse/SAK-21599</a> and <a href="https://github.com/sakaiproject/sakai/commit/c1ae444">https://github.com/sakaiproject/sakai/commit/c1ae444</a>.</p>
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```

user/user-tool-prefs/tool/src/java/org/sakaiproject/user/tool/PrivacyBean.java
@@ -257,8 +257,12 @@ public void setCheckBoxText(String checkBoxText) {
257      * @return true if there are no sites for the current user OR
258      false otherwise
259      */
260      public boolean getSitesEmpty() {
261          // sites has 1 item in it even if there are no sites in it
262          return (this.sites == null || this.sites.length <= 1);
263      }
264      /** ===== processes interaction on UI ===== */
265
266      * @return true if there are no sites for the current user OR
267      false otherwise
268      */
269      public boolean getSitesEmpty() {
270          // getSites always adds My Workspace, so we know whether
271          it has run or
272          // not by checking if sites is empty; this avoids an
273          extra query if it has.
274          if (sites == null || sites.length == 0) {
275              getSites();
276          }
277          return (sites == null || sites.length <= 1);
278      }
279      /** ===== processes interaction on UI ===== */

```

Figure 2: An example of missing privacy preference settings in Sakai repository (Issue SAK-21599).

Table 3: An example of unsuccessful privacy preferences modification weakness.

<p><b>Subcategory:</b> Exclusion</p> <p><b>Class:</b> Not allowing a user to modify his/her privacy preferences</p> <p><b>Name:</b> Unsuccessful privacy preferences modification</p> <p><b>Description:</b> The software does not allow users to modify their privacy preferences.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused when the users cannot change their privacy preferences in the software.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: User privacy is violated since the users cannot modify their privacy preferences.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Investigate the functions that involve with privacy preference settings.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Allow to modify privacy preference settings. Description: The software development team should provide a function letting users to modify their privacy preferences.</p> <p><b>Demonstrative examples:</b> Issue 1048121 in Chrome reports that a user could not modify their <i>block third parties cookies</i> setting, which can be considered as a privacy preference. The browser showed the icon for the user to change his privacy preference setting, however nothing happened after he clicked that icon. References: <a href="https://bugs.chromium.org/p/chromium/issues/detail?id=1048121">https://bugs.chromium.org/p/chromium/issues/detail?id=1048121</a> and <a href="https://chromium.googlesource.com/chromium/src.git/+e942d725842c0572e99321232541a5d16c6319a9\%5E\%21/\#F0">https://chromium.googlesource.com/chromium/src.git/+e942d725842c0572e99321232541a5d16c6319a9\%5E\%21/\#F0</a>. Issue SAK-29299 in Sakai repository reports that a user failed to modify his privacy preference in the system. The user had modified his privacy status to hide himself in the system, however the system still showed his account. References: <a href="https://jira.sakaiproject.org/browse/SAK-29299">https://jira.sakaiproject.org/browse/SAK-29299</a> and <a href="https://github.com/sakaiproject/sakai/commit/84b7332">https://github.com/sakaiproject/sakai/commit/84b7332</a>.</p>
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```

diff --git a/chrome/browser/resources/ntp4/incognito_tab.html b/chrome/browser/resources/ntp4/incognito_tab.html
index c4ca611..b666b0c 100644
--- a/chrome/browser/resources/ntp4/incognito_tab.html
+++ b/chrome/browser/resources/ntp4/incognito_tab.html

@@ -39,7 +39,8 @@
         icon-aria-label="${i18n(cookieControlsTitle)}"
         icon-class="${i18n(cookieControlsToolTipIcon)}"
         tooltip-text="${i18n(cookieControlsToolTipText)}"
-         style="cursor: pointer;" ${i18n(hideToolTipIcon)}</cr-tooltip-icon>
+         role="link" style="cursor: pointer;" ${i18n(hideToolTipIcon)}>
+     </cr-tooltip-icon>
+     <cr-toggle id="cookie-controls-toggle"
+         aria-label="${i18n(cookieControlsTitle)}"
+         ${i18n(cookieControlsToggleChecked)} dark></cr-toggle>

diff --git a/chrome/browser/resources/ntp4/incognito_tab.js b/chrome/browser/resources/ntp4/incognito_tab.js
index b89ecb8..c7bce60 100644
--- a/chrome/browser/resources/ntp4/incognito_tab.js
+++ b/chrome/browser/resources/ntp4/incognito_tab.js

@@ -20,6 +20,12 @@
    $('cookie-controls-toggle').addEventListener('change', event => {
        chrome.send('cookieControlsToggleChanged', [event.detail]);
    });
+    // Make cookie-controls-tooltip-icon respond to the enter key.
+    $('cookie-controls-tooltip-icon').addEventListener('keyup', event => {
+        if (event.key === 'Enter') {
+            $('cookie-controls-tooltip-icon').click();
+        }
+    });
    $('cookie-controls-tooltip-icon').onclick = () => {
        window.location.href = 'chrome://settings/content/cookies';
    });

```

Figure 3: An example of unsuccessful privacy preferences modification in Chrome (Issue 1048121).

roster2/src/java/org/sakaiproject/roster/impl/SakaiProxyImpl.java	
<pre> 486 @@ -486,11 +486,12 @@ public RosterMember getMember(String siteId, String userId, String enrollmentSet 487     for (Iterator&lt;RosterMember&gt; i = members.iterator(); i.hasNext(); ) { 488         RosterMember member = i.next(); 489 490 -        userIds.add(member.getId()); 491 492         // If this member is not in the authzGroup, remove them. 493 -        if (authzGroup.getMember(member.getId()) == null) { 494             i.remove(); 495         } 496     } </pre>	<pre> 486     for (Iterator&lt;RosterMember&gt; i = members.iterator(); i.hasNext(); ) { 487         RosterMember member = i.next(); 488         String userId = member.getId(); 489 490 +        userIds.add(userId); 491 492         // If this member is not in the authzGroup, remove them. 493 +        if (authzGroup.getMember(userId) == null) { 494             i.remove(); 495         } 496     } </pre>
<pre> 509 @@ -509,9 +510,10 @@ public RosterMember getMember(String siteId, String userId, String enrollmentSet 510     // determine filtered membership 511     for (RosterMember member : members) { 512 513 -        // skip if privacy restricted 514 -        if (hiddenUserIds.contains(member.getId())) { 515             continue; 516         } 517     } </pre>	<pre> 510     // determine filtered membership 511     for (RosterMember member : members) { 512         String userId = member.getId(); 513 514 +        // skip if privacy restricted and not the current user 515 +        if (!userId.equals(currentUserId) &amp;&amp; 516             hiddenUserIds.contains(userId)) { 517             continue; 518         } 519     } </pre>
<pre> 541 @@ -541,8 +543,7 @@ public RosterMember getMember(String siteId, String userId, String enrollmentSet 542     membership.addAll(site.getMembers()); 543 } else if (null != site.getGroup(groupId)) { 544     // get all members of requested groupId 545 -    membership.addAll(site.getGroup(groupId) 546         .getMembers()); 547 } else { 548     // assume invalid groupId specified 549     return null; </pre>	<pre> 543     membership.addAll(site.getMembers()); 544 } else if (null != site.getGroup(groupId)) { 545     // get all members of requested groupId 546 +    membership.addAll(site.getGroup(groupId).getMembers()); 547 } else { 548     // assume invalid groupId specified 549     return null; </pre>

Figure 4: An example of unsuccessful privacy preferences modification in Sakai repository (Issue SAK-29299).



Table 4: An example of missing a notice to notify changes in consent weakness.

<p><b>Subcategory:</b> Exclusion</p> <p><b>Class:</b> Not notifying an update notice of changes of consent</p> <p><b>Name:</b> Missing a notice to notify changes in consent.</p> <p><b>Description:</b> The software does not provide a function to notify users about any changes in consent. This makes users unaware of changes related to their personal data processing that they have given consent to.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused when the consent related to their personal data processing is changed, but the users are not notified.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: Personal data may be used in the processing that is not satisfied based on user consent.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Investigate the functions involve with user consent.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Notify users. Description: The software development team should provide a function to send out an update notice to users when the conditions in the consent are changed.</p> <p><b>Demonstrative example:</b> Issue MDL-61273 in Moodle reports several tasks related to the implementation of a consent page. One of the tasks is to notify users when the consent is changed. The users need to accept the new version of consent before accessing the site. References: <a href="https://tracker.moodle.org/browse/MDL-61273">https://tracker.moodle.org/browse/MDL-61273</a> and <a href="https://github.com/moodle/moodle/blob/511a87f">https://github.com/moodle/moodle/blob/511a87f</a>.</p>
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```

38 class acceptance_updated extends acceptance_base {
39
40     /**
41      * Initialise the event.
42      */
43     protected function init() {
44         parent::init();
45         $this->data['crud'] = 'u';
46     }
47
48     /**
49      * Returns event name.
50      *
51      * @return string
52      */
53     public static function get_name() {
54         return get_string('event_acceptance_updated', 'tool_policy');
55     }
56
57     /**
58      * Get the event description.
59      *
60      * @return string
61      */
62     public function get_description() {
63         if ($this->other['status'] == 1) {
64             $action = 'added consent to';
65         } else if ($this->other['status'] == -1) {
66             $action = 'revoked consent to';
67         } else {
68             $action = 'updated consent to';
69         }
70         return "The user with id '{$this->userid}' $action the policy with revision {$this->other['policyversionid']} ".
71             "for the user with id '{$this->relateduserid}'";
72     }
73 }

```

Figure 5: An example of accepting the new version of consent in Moodle (Issue MDL-61273).

Table 5: An example of unsuccessful consent modification weakness.

<p><b>Subcategory:</b> Exclusion</p> <p><b>Class:</b> Not allowing a user to modify his/her consent</p> <p><b>Name:</b> Unsuccessful consent modification</p> <p><b>Description:</b> The software does not allow users to modify their consent.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused when the users cannot modify their consent in the software.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: User privacy is violated since the users cannot make changes to their consent.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Investigate the functions involve with user consent.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Allow to modify consent. Description: The software development team should provide a function for users to successfully modify their consent.</p> <p><b>Demonstrative example:</b> Issue MDL-62062 in Moodle reports that a user cannot find a way to change her consent agreements once the consent agreements has been accepted. References: <a href="https://tracker.moodle.org/browse/MDL-62062">https://tracker.moodle.org/browse/MDL-62062</a> and <a href="https://github.com/moodle/moodle/commit/3d34aa5">https://github.com/moodle/moodle/commit/3d34aa5</a>. Issue MDL-63109 in Moodle reports that an administrator cannot successfully modify the consent status on behalf of the selected users. References: <a href="https://tracker.moodle.org/browse/MDL-63109">https://tracker.moodle.org/browse/MDL-63109</a> and <a href="https://github.com/moodle/moodle/commit/558126a">https://github.com/moodle/moodle/commit/558126a</a>.</p>
---

admin/tool/policy/classes/output/page_agreedocs.php	
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242	242
243	243
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Figure 6: An example of unsuccessful consent modification in Moodle (Issue MDL-62062).

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Figure 7: An example of unsuccessful consent modification in Moodle (Issue MDL-63109).

Table 6: An example of missing consent withdrawal weakness.

**Subcategory:** Exclusion

**Class:** Not allowing a user to withdraw his/her consent

**Name:** Missing consent withdrawal

**Description:** The software forces users to give consent before providing its services. These services may include personal data processing. However, the software does not provide a function for users to withdraw their consent. The users can only accept consent, but they cannot withdraw their consent when they wish to. This vulnerability seriously violates user privacy.

**Mode of introduction:** Phase: Architecture and Design. This weakness is caused by a missing privacy consideration about consent management and its related processes, which leads to the missing consent withdrawal function.

**Common consequence:** The software violates user privacy by not allowing users to express their agreement on the use of their personal data.

**Detection method:** Method: Manual analysis. Description: A consent management page or window in a software does not show an icon or option to withdraw consent.

**Potential mitigation:** Phase: Architecture and Design. Strategy: Consider a user consent withdrawal. Description: The software development team should consider which points in the software that should provide a user an ability to withdraw consent.

**Demonstrative example:** Issue MDL-62309 in Moodle reports that the users cannot withdraw consent and cannot enter the site without giving consent. This issue violates user privacy as the users should be able to freely withdraw consent. Reference: <https://tracker.moodle.org/browse/MDL-62309>.

..... ↓ ↑ .....	@@ -138,6 +135,8 @@ public function export_for_template(renderer_base \$output) {		
138	}	135	}
139		136	
140	\$data->policies = array_values(\$policies);	137	\$data->policies = array_values(\$policies);
		138	+ \$data->canrevoke = \tool_policy\api::can_revoke_policies(array_keys(\$versionids), \$this->userid);
		139	+ return \$data;
141	return \$data;	140	return \$data;
142	}	141	}
143	}	142	}

Figure 8: An example of missing consent withdrawal function in Moodle (Issue MDL-62309).

Table 7: An example of collecting personal data without user consent/permissions weakness.

**Subcategory:** Surveillance

**Class:** Collecting personal data without user consent/permissions

**Name:** Missing a consent check before collecting personal data

**Description:** The software does not check for a user consent prior to personal data collection. This makes the software collect personal data that users have not given consent to (e.g., location and speech).

**Mode of introduction:** Phase: Implementation. This weakness is caused by missing a consent check before collecting personal data.

**Common consequence:** The software violates user privacy since users have not given consent/permissions to collect their personal data.

**Detection method:** Method: Manual analysis. Description: Perform a code check at points of personal data collection.

**Potential mitigation:** Phase: Implementation. Strategy: Check for user consent before collecting data. Description: The software development team should perform a consent check at every point that collects personal data in the software.

**Demonstrative example:** A commit 0b09df0 in HumanDynamics/rhythm-server repository collects user speech without consent check. Reference: <https://github.com/HumanDynamics/rhythm-server/commit/0b09df0>.





Table 8: An example of using personal data for unspecified purposes weakness.

<p><b>Subcategory:</b> Secondary use</p> <p><b>Class:</b> Using personal data for unspecified purposes</p> <p><b>Name:</b> Using personal data for unspecified purposes</p> <p><b>Description:</b> The software uses personal data for any purpose other than the original purposes specified to the users. The users are not aware or have not given consent to the additional purposes.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused when the software uses personal data for any purposes other than the original purposes.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: User privacy is violated since the users are not aware or have not given consent to use their personal data for unspecified purposes.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Perform a check if the software uses personal data for other purposes that are not informed to the users.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Check for a purpose before use. Description: The software development team should implement a function to check for the personal data that can be used for a specific purpose.</p> <p><b>Demonstrative example:</b> Issue 636461 in Chrome reports that the autocomplete password fields in incognito mode automatically fill the saved passwords. The user has accepted to the purpose of passwords autofill in normal mode. However, the browser applied this purpose in incognito mode which was not the user's intention. In incognito mode, the browser should preserve user privacy by not logging any traceable activities or identifiable personal data. References: <a href="https://bugs.chromium.org/p/chromium/issues/detail?id=636461">https://bugs.chromium.org/p/chromium/issues/detail?id=636461</a> and <a href="https://codereview.chromium.org/2236413002/diff/1/components/autofill/content/renderer/password_autofill_agent.cc">https://codereview.chromium.org/2236413002/diff/1/components/autofill/content/renderer/password_autofill_agent.cc</a>.</p>
---

```

        (...skipping 606 matching lines...)
617 was_user_gesture_seen_ = false;
618 elements_.clear();
619 }
620
621 void PasswordAutofillAgent::PasswordValueGatekeeper::ShowValue(
622     blink::WebInputElement* element) {
623     if (!element->isNull()) && element->suggestedValue().isEmpty()
624         element->setValue(element->suggestedValue(), true);
625 }
626
627 bool PasswordAutofillAgent::TextFieldDidEndEditing(
628     const blink::WebInputElement& element) {
629     WebInputToPasswordInfoMap::const_iterator iter =
630         web_input_to_password_info_.find(element);
631     if (iter == web_input_to_password_info_.end())
632         return false;
633
634     const PasswordInfo& password_info = iter->second;
635     // Don't let autofill overwrite an explicit change made by the user.
636     if (password_info.password_was_edited_last)
637         return false;
638
639     const PasswordFormFillData& fill_data = password_info.fill_data;
640
641     // If wait_for_username is false, we should have filled when the text changed.
642     if (!fill_data.wait_for_username)
643         return false;
644
645     blink::WebInputElement password = password_info.password_field;
646     if (!isElementEditable(password))
647         return false;
648
649     blink::WebInputElement username = element; // We need a non-const.
650
651     // Do not set selection when ending an editing session, otherwise it can
652     // mess with focus.
653     FillUserNameAndPassword(username, &password, fill_data, true, false,
654                             &field_value_and_properties_map_,
655                             base::Bind(&PasswordValueGatekeeper::RegisterElement,
656                                         base::Unretained(&gatekeeper_)),
657                             nullptr);
658     return true;
659 }
660
661 bool PasswordAutofillAgent::TextDidChangeInTextField(
662     const blink::WebInputElement& element) {
663     // TODO(vabr): Get a mutable argument instead. http://crbug.com/397083
664     blink::WebInputElement mutable_element = element; // We need a non-const.
665     mutable_element.setAutofilled(false);
666
667     WebInputToPasswordInfoMap::iterator iter =
668         web_input_to_password_info_.find(element);
669     if (iter != web_input_to_password_info_.end()) {
670         iter->second.password_was_edited_last = false;
671         // If wait_for_username is true we will fill when the username loses focus.
672         if (iter->second.fill_data.wait_for_username)
673             return false;
674     }
675
676     bool PasswordAutofillAgent::TextDidChangeInTextField(
677         const blink::WebInputElement& element) {
678         // TODO(vabr): Get a mutable argument instead. http://crbug.com/397083
679         blink::WebInputElement mutable_element = element; // We need a non-const.
680         mutable_element.setAutofilled(false);
681
682         WebInputToPasswordInfoMap::iterator iter =
683             web_input_to_password_info_.find(element);
684         if (iter != web_input_to_password_info_.end()) {
685             iter->second.password_was_edited_last = false;
686         }
687     }

```

Figure 10: An example of using personal data for unspecified purposes in Chrome (Issue 636461).

Table 9: An example of missing a permission check before using personal data weakness.

<p><b>Subcategory:</b> Secondary use</p> <p><b>Class:</b> Using personal data without user permissions</p> <p><b>Name:</b> Missing a permission check before using personal data.</p> <p><b>Description:</b> The software does not check for user permissions before using their personal data in any personal data processing. Different users may allow the software to use their personal data for different purposes.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused by missing a check for user permissions before using personal data.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: Personal data is used without user permissions. This leads to user privacy violation.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Perform a code check at the functions that use personal data.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Check for user permissions before using personal data. Description: The software development team should implement a function to check for user permissions before using personal data in any personal data processing.</p> <p><b>Demonstrative example:</b> Issue SAK-26744 in Sakai repository reports that the requested friends function in the system does not check for user permissions before linking their profiles. Some users might not allow to show or link their profile publicly to preserve their privacy. The system therefore needs to check their privacy permissions before using their personal data. This issue was already fixed, but we do not have an access to the code of this issue. Reference: <a href="https://jira.sakaiproject.org/browse/SAK-26744">https://jira.sakaiproject.org/browse/SAK-26744</a>.</p>
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Table 10: An example of missing a permission check before transferring personal data weakness.

<p><b>Subcategory:</b> Secondary use</p> <p><b>Class:</b> Transferring personal data without user permissions</p> <p><b>Name:</b> Missing a permission check before transferring personal data</p> <p><b>Description:</b> The software does not check if users allow their personal data to be transferred.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused by missing a check for user permissions before transferring personal data.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy violation. Note: Personal data is transferred without user permissions. This leads to user privacy violation.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Perform a code check at the functions that transfer personal data.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Check for user permissions before using personal data. Description: The software development team should implement a function to check for user permissions before transferring personal data.</p> <p><b>Demonstrative example:</b> Issue MDL-62549 requests the system to warn users before transferring user data to YouTube or other external platforms. This function reminds the users about the data transfer. In addition, it also checks for user permissions before transferring data. This issue is still in progress, thus the code changes are not captured. Reference: <a href="https://tracker.moodle.org/browse/MDL-62549">https://tracker.moodle.org/browse/MDL-62549</a>.</p>
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Table 11: An example of improper personal data protection at third parties weakness.

<p><b>Subcategory:</b> Insecurity</p> <p><b>Class:</b> Applying lower levels of personal data protection at third parties</p> <p><b>Name:</b> Improper personal data protection at third parties</p> <p><b>Description:</b> The software transfers personal data to third parties for processing. However, the third parties apply lower levels of personal data protection than the sources do.</p> <p><b>Mode of introduction:</b> Phase: Implementation. Description: This weakness is caused when third parties apply lower levels of personal data protection than the sources do.</p> <p><b>Common consequence:</b> Scope: Privacy. Impact: Privacy leak. Note: This weakness may cause a privacy leak since personal data is not protected using the same or higher levels of protection.</p> <p><b>Detection method:</b> Method: Manual analysis. Description: Perform a check at the functions that process personal data at third parties site.</p> <p><b>Potential mitigation:</b> Phase: Implementation. Strategy: Implement equivalent personal data protection mechanisms. Description: The software development team has to inform third parties about the protection mechanisms that the source uses to protect personal data. The third parties then implement equivalent personal data protection mechanisms.</p> <p><b>Demonstrative example:</b> Issue SAK-41039 in Sakai repository reports that the IP addresses are not anonymised when using a third party plugin (i.e., Google Analytics). The users would like to anonymise their IP addresses when using the Google Analytics. References: <a href="https://jira.sakaiproject.org/browse/SAK-41039">https://jira.sakaiproject.org/browse/SAK-41039</a> and <a href="https://github.com/sakaiproject/sakai/commit/b1cedcd">https://github.com/sakaiproject/sakai/commit/b1cedcd</a>.</p>
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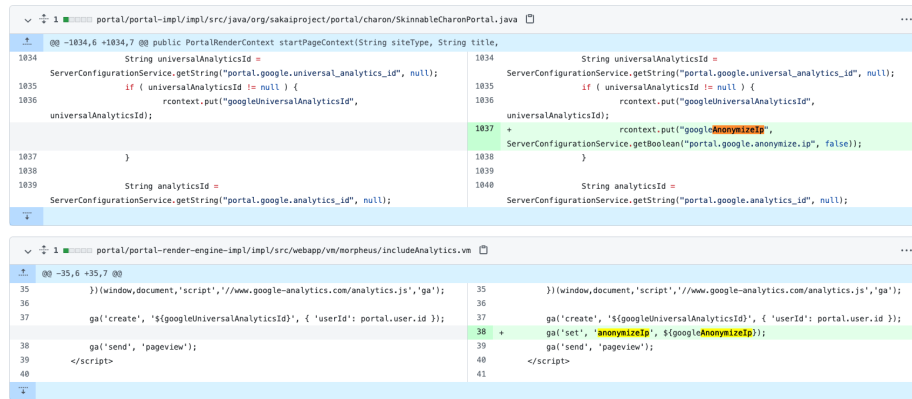


Figure 11: An example of improper personal data protection at third parties in Sakai repository (Issue SAK-41039).