MODULE *GDPR_Time*

EXTENDS *Naturals*, *TimeUtils*, *Sequences*

CONSTANTS
DataSubjects,
Data,
InitialEvents

$TimePoint \triangleq \{e.time : e \in InitialEvents\} \cup \{e.end\_time : e \in InitialEvents\}$

$EventRecordTypes \triangleq \{\text{"StartProcessing"}, \text{"GiveConsent"}, \text{"WithdrawConsent"}, \text{"StartContract"}, \text{"EndContract"}\}$

$Event \triangleq [type : EventRecordTypes, time : TimePoint, subject : DataSubjects, data : Data, end\_time : TimePoint]$

$LegalBasis \triangleq [type : \{\text{"Consent"}, \text{"Contract"}\}, subject : DataSubjects, data : Data, start : TimePoint, end : TimePoint]$

$Process \triangleq [subject : DataSubjects, data : Data, start : TimePoint, end : TimePoint]$

VARIABLES
currentTime,
eventsToProcess,
activeProcesses,
activeLegalBases,
breachesInProgress

$InitialTime \triangleq \text{IF } InitialEvents = \{\} \text{ THEN } [year \mapsto FixedEpochYear, month \mapsto 1, day \mapsto 1, hour \mapsto 0, minute \mapsto 0] \text{ ELSE } MinTime(InitialEvents)$

$EndTime \triangleq \text{IF } InitialEvents = \{\} \text{ THEN } [year \mapsto FixedEpochYear + 50, month \mapsto 12, day \mapsto 31, hour \mapsto 23, minute \mapsto 59] \text{ ELSE } MaxTime(InitialEvents)$

$$
\begin{aligned}
Init \triangleq\ & \land\ currentTime = InitialTime \\
& \land\ eventsToProcess = InitialEvents \\
& \land\ activeProcesses\ = \{\} \\
& \land\ activeLegalBases = \{\} \\
& \land\ breachesInProgress = \{\}
\end{aligned}
$$

$$
\begin{aligned}
& StartProcessing(e) \triangleq \\
& \quad \land\ e.type = \text{“StartProcessing”} \\
& \quad \land\ eventsToProcess' = eventsToProcess \setminus \{e\} \\
& \quad \land\ currentTime' = e.time \\
& \quad \land\ activeProcesses' = activeProcesses \cup \{[subject \mapsto e.subject, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad data \mapsto e.data, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad start \mapsto e.time, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad\ end \mapsto EndTime]\} \\
& \quad \land\ \text{UNCHANGED}\ \langle activeLegalBases,\ breachesInProgress \rangle
\end{aligned}
$$

$$
\begin{aligned}
& GiveConsent(e) \triangleq \\
& \quad \land\ e.type = \text{“GiveConsent”} \\
& \quad \land\ eventsToProcess' = eventsToProcess \setminus \{e\} \\
& \quad \land\ currentTime' = e.time \\
& \quad \land\ activeLegalBases' = activeLegalBases \cup \{[type \mapsto \text{“Consent”}, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad subject \mapsto e.subject, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad data \mapsto e.data, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad start \mapsto e.time, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\qquad\quad end \mapsto EndTime]\} \\
& \quad \land\ \text{UNCHANGED}\ \langle activeProcesses,\ breachesInProgress \rangle
\end{aligned}
$$

$$
\begin{aligned}
& WithdrawConsent(e) \triangleq \\
& \quad \land\ e.type = \text{“WithdrawConsent”} \\
& \quad \land\ \exists\, c \in activeLegalBases : \\
& \qquad c.type = \text{“Consent”} \land c.subject = e.subject \land c.data = e.data \\
& \quad \land\ \text{LET}\ consentToRemove \triangleq \text{CHOOSE}\ c \in activeLegalBases : \\
& \qquad\qquad\qquad\qquad\qquad\qquad c.type = \text{“Consent”} \land c.subject = e.subject \land c.data = e.data \\
& \qquad \text{IN} \\
& \qquad\quad \land\ eventsToProcess' = eventsToProcess \setminus \{e\} \\
& \qquad\quad \land\ currentTime' = e.time \\
& \qquad\quad \land\ activeLegalBases' = (activeLegalBases \setminus \{consentToRemove\}) \\
& \qquad\qquad\qquad\qquad\qquad\qquad \cup \{[type \mapsto consentToRemove.type, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\quad subject \mapsto consentToRemove.subject, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\quad data \mapsto consentToRemove.data, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\quad start \mapsto consentToRemove.start, \\
& \qquad\qquad\qquad\qquad\qquad\qquad\quad end \mapsto e.time]\} \\
& \qquad\quad \land\ \text{UNCHANGED}\ \langle activeProcesses,\ breachesInProgress \rangle
\end{aligned}
$$

$$
StartContract(e) \triangleq
$$

$\land\ e.type = \text{“StartContract”}$
$\land\ eventsToProcess' = eventsToProcess \setminus \{e\}$
$\land\ currentTime' = e.time$
$\land\ activeLegalBases' = activeLegalBases \cup \{[type \mapsto \text{“Contract”},$
$subject \mapsto e.subject,$
$data \mapsto e.data,$
$start \mapsto e.time,$
$end \mapsto e.end\_time]\}$
$\land$ UNCHANGED $\langle activeProcesses,\ breachesInProgress\rangle$

$EndContract(e) \triangleq$
$\land\ e.type = \text{“EndContract”}$
$\land\ \exists\, c \in activeLegalBases :$
$c.type = \text{“Contract”} \land c.subject = e.subject \land c.data = e.data$
$\land$ LET $contractToEnd \triangleq$ CHOOSE $c \in activeLegalBases :$
$c.type = \text{“Contract”} \land c.subject = e.subject \land c.data = e.data$
IN
$\land\ contractToEnd \in activeLegalBases$
$\land\ eventsToProcess' = eventsToProcess \setminus \{e\}$
$\land\ currentTime' = e.time$
$\land\ activeLegalBases' = (activeLegalBases \setminus \{contractToEnd\})$
$\cup \{[type \mapsto contractToEnd.type,$
$subject \mapsto contractToEnd.subject,$
$data \mapsto contractToEnd.data,$
$start \mapsto contractToEnd.start,$
$end \mapsto e.time]\}$
$\land$ UNCHANGED $\langle activeProcesses,\ breachesInProgress\rangle$

$IsLawful(p) \triangleq$
$\exists\, l \in activeLegalBases :$
$\land\ p.subject = l.subject$
$\land\ p.data = l.data$
$\land\ TimeBetween(l.start,\ l.end,\ currentTime)$
$\land\ TimeBetween(p.start,\ p.end,\ currentTime)$

$BreachOccurs \triangleq$
$\exists\, p \in activeProcesses :$
$\land\ \neg IsLawful(p)$
$\land\ [process \mapsto p,\ status \mapsto \text{“Pending”}] \notin breachesInProgress$
$\land\ breachesInProgress' = breachesInProgress$
$\cup \{[process \mapsto p,$
$status \mapsto \text{“Pending”},$
$breachTime \mapsto currentTime$
$]$
$\}$

$\land$ UNCHANGED $\langle currentTime,\ activeProcesses,\ activeLegalBases,\ eventsToProcess \rangle$

$ReportBreach \triangleq$
$\exists\, b \in breachesInProgress :$
$\land\ b.status = \text{“Pending”}$
$\land\ breachesInProgress' = (breachesInProgress \setminus \{b\}) \cup \{[b \text{ EXCEPT } !.status = \text{“Reported”}]\}$
$\land$ UNCHANGED $\langle currentTime,\ activeProcesses,\ activeLegalBases,\ eventsToProcess \rangle$

$Next \triangleq$
Event-driven actions
$\lor \exists\, e \in eventsToProcess :$
$\land\ e.time = MinTime(eventsToProcess)$
$\land\ \lor\ GiveConsent(e)$
$\lor\ WithdrawConsent(e)$
$\lor\ StartProcessing(e)$
$\lor\ StartContract(e)$
$\lor\ EndContract(e)$
State-driven actions
$\lor\ BreachOccurs$
$\lor\ ReportBreach$

$TypeInvariant \triangleq$
$\land\ currentTime \in TimePoint$
$\land\ eventsToProcess \subseteq InitialEvents$
$\land\ activeProcesses\ \subseteq Process$
$\land\ activeLegalBases \subseteq LegalBasis$
$\land\ breachesInProgress \subseteq [breachTime : TimePoint,\ status : \{\text{“Pending”},\ \text{“Reported”}\}]$

Rule 1: Legal Basis Requirement If personal data is being processed, there must be a legal basis for it.

$AllProcessingIsLawful \triangleq$
$\forall\, p \in activeProcesses :$
$\exists\, l \in activeLegalBases :$
$\land\ p.subject = l.subject$
$\land\ p.data = l.data$
$\land\ TimeBetween(l.start,\ l.end,\ currentTime)$

Rule 2: Legal Basis Types
A legal basis must be a recognized type, such as consent or contract.

$LegalBasesHaveValidType \triangleq$
$\forall\, l \in activeLegalBases : l.type \in \{\text{“Consent”},\ \text{“Contract”}\}$

Rule 3: *Consent* Timing
Consent must be obtained before processing starts and remain valid during processing.

$ConsentTimingIsValid \triangleq$
$\forall\, p \in activeProcesses :$
$(\exists\, l \in activeLegalBases :$

$$
\begin{aligned}
&\quad \wedge\ p.subject = l.subject \\
&\quad \wedge\ p.data = l.data \\
&\quad \wedge\ l.type\ = \text{“Consent”} \\
&\quad \wedge\ Before(l.start,\ p.start) \\
&\ )
\end{aligned}
$$

Rule 4: *Contract* Timing
Contract-based processing is only lawful during the contract term.

$$
\begin{aligned}
&ContractTimingIsValid\ \triangleq \\
&\quad \forall\, p \in activeProcesses : \\
&\quad (\exists\, l \in activeLegalBases : \\
&\quad \wedge\ p.subject = l.subject \\
&\quad \wedge\ p.data = l.data \\
&\quad \wedge\ l.type\ = \text{“Contract”} \\
&\quad \wedge\ TimeBetween(l.start,\ l.end,\ currentTime) \\
&\ )
\end{aligned}
$$

Rule 5: Breach Reporting Deadline
Guarantees that data breaches are reported within 72 hours of discovery.

$$
\begin{aligned}
&BreachReportedOnTime\ \triangleq \\
&\quad \forall\, b \in breachesInProgress : \\
&\quad (b.status = \text{“Pending”}) \Rightarrow Within72Hours(b.breachTime,\ currentTime)
\end{aligned}
$$