École Pour l'Informatique et les Techniques Avancées – EPITA

Masters program - 18 March 2022

Course: Data Privacy by Design



Data Privacy by Design (PbD)

Date & Time	No.	Topics	Duration (in hours)
04/03/2022 14:30-17:30	1	Data & its types, Information & knowledge, Introduction to Data Privacy by Design (PbD)	3 hours
18/03/2022 14:30-17:30	2	DPbd Case studies, Data privacy risks & solutions	3 hours
02/04/2022 10:00-13:00	3	Privacy Enhancing Technologies (PET's)	3 hours
22/04/2022 14:30-17:30	4	General Data Protection Regulation (GDPR), PbD and GDPR	3 hours
29/04/2022 14:30-17:30	5	Open session, Putting it all together, Quiz, Final project presentation	3 hours
Total Lecture (hours) 15			

Evaluation: 10% Class attendance + 10% Class participation + 30% Class/home exercises + 50% Final Evaluation



Lecture 2 Outline

- Data Privacy by Design (DPbD)
 - Class exercise solution
 - Methodology
 - Take-away

- Data privacy risks and solutions
 - Top privacy risks
 - Crypto package
 - Class exercise 3
 - Data masking (Anonymization vs Pseudonymisation)
 - Data masking (common techniques)
- Putting it altogether
 - Class exercise 4



Case Study 2: European Electronic Toll Service (EETS)

- Defined functionality:
 - Pay according to road use: time, distance, road type, ...
- Requirements:
 - Privacy & integrity risks to be mitigated:
 - 1. Third party access to traffic/location data of driver.
 - 2. Abuse of traffic data by authority performing the billing (location data cannot be easily anonymized).
 - The provider needs to know the final fee to charge
 - The provider must be reassured that this fee is correctly computed and users cannot commit fraud

Note: Location as a means to compute above points -> not intrinsic

Class exercise 2: activity

Form basic information model &

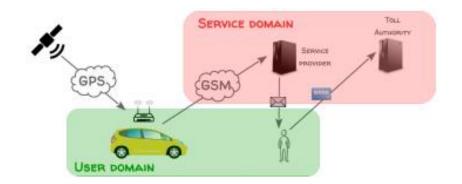
perform the 4 activities:

- 1. Classify entities in domains
- Identify necessary data for providing the service
- Distribute data in architecture
- 4. Select technological solutions





SOLUTION 1/2



Activity 1: Classify Entities in domains

User domain: Components under control of the user e.g., user devices, GPS receiver, ...

Service domain: Components outside the control of the user, e.g., backend system, ...

Activity 2: Identify necessary data for <u>providing to the service</u> <u>domain</u>

Location data - to compute bill

Billing data - to charge user

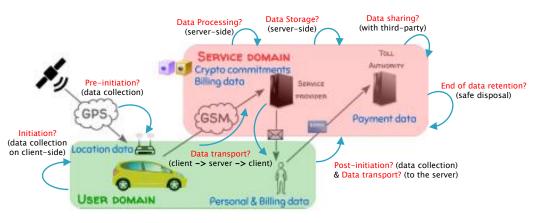
Personal data - to send bill

Payment data - to perform payment, ...



Activity 3: Distribute data in architecture

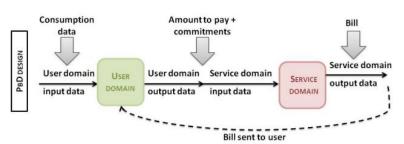
SOLUTION 2/2



- Is location data needed or only the amount to bill?
 - Crypto commitments?

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What can go wrong?



Risk analysis? (Likelihood vs Impact)

- Data compromises
- 2. Service compromises
- Data sharing
- 4. ...

Address threats in order of their priority (per risk analysis)

Activity 4: Select technological solutions

- Not sending the data (local computations)
- Encrypting the data / Advanced privacypreserving protocols
- 3. Obfuscate the data / Anonymize the data
- 4. ..

Keeping as much data as possible out of the service domain for satisfying the data integrity requirements



No fixed methodology

- Take privacy considerations and perform risk management at all levels of project management
- Assert data subject rights and integrate appropriate controls to mitigate privacy risks at all stages of development
 - E.g., requirements, specification, implementation, testing, deployment, maintenance
- Focus on raising Transparency of service/product:
 - Make your Privacy policy/Terms of service easy-tounderstand
 - Take clear user consent (e.g. no pre-ticked boxes) with no shady tactics (e.g., clickbait)

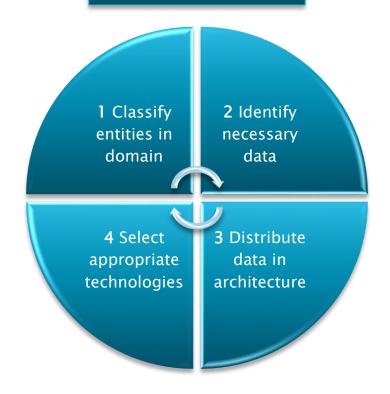
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Take away!

Assumptions:
Functionality &
requirement defined,
Basic ref. model, ...

Remember the Overall Goal, and 6 strategies!



Covering full life-cycle using Agile approach



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OWASP Top 10 Privacy Risks project

#	Туре	Title	Frequency	Impact	Description
P1		Web Application Vulnerabilities	High	Very high	Vulnerability is a key problem in any system that guards or operates on sensitive user data. Failure to suitably design and implement an application, detect a problem or promptly apply a fix (patch) is likely to result in a privacy breach. This risk also encompasses the OWASP Top 10 List of web application vulnerabilities and the risks resulting from them.
P2	2.00	Operator- sided Data Leakage	High	Very high	Failure to prevent the leakage of any information containing or related to user data, or the data itself, to any unauthorized party resulting in loss of data confidentiality. Introduced either due to intentional malicious breach or unintentional mistake e.g. caused by insufficient access management controls, insecure storage, duplication of data or a lack of awareness.
P3	2.00	Insufficient Data Breach Response	High	Very high	Not informing the affected persons (data subjects) about a possible breach or data leak, resulting either from intentional or unintentional events; failure to remedy the situation by fixing the cause; not attempting to limit the leaks.
P4	2	Consent on Everything	Very high	High	Aggregation or inappropriate use of consent to legitimate processing. Consent is "on everything" and not collected separately for each purpose (e.g. use of website and profiling for advertising).
P5	2	Non- transparent Policies, Terms and Conditions	Very high	High	Not providing sufficient information to describing how data is processed, such as its collection, storage, and processing. Failure to make this information easily-accessible and understandable for non-lawyers.

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P6	20	Insufficient Deletion of Personal Data	High	High	Failure to effectively and/or timely delete personal data after termination of the specified purpose or upon request.
P7	20	Insufficient Data Quality	Medium	Very high	The use of outdated, incorrect or bogus user data. Failure to update or correct the data.
P8		Missing or insufficient Session Expiration	Medium	Very high	Failure to effectively enforce session termination. May result in collection of additional user-data without the user's consent or awareness.
P9	20	Inability of users to access and modify data	High	High	Users do not have the ability to access, change or delete data related to them.
P1 0	2	Collection of data not required for the user- consented purpose	High	High	Collecting descriptive, demographic or any other user-related data that are not needed for the purposes of the system. Applies also to data for which the user did not provide consent.

Version 2.0 - 2021

Source: https://owasp.org/www-project-top-10-privacy-risks



Some Examples

<u>P2: Operator-</u> <u>sided Data</u> <u>Leakage</u>

- Lack of awareness
- Poor access management
- Unnecessary copies of personal data
- ...

Dark archives

Duplicates

Shadow IT

No consistent security

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<u>P5: Non-transparent Policies,</u> Terms & Conditions

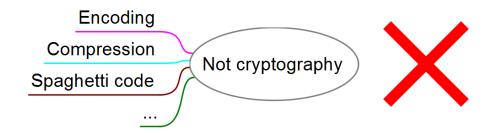
- Privacy Policies, Terms & Conditions are not up-todate, inaccurate, incomplete or hard to find e.g., Check https://pribot.org/polisis
- Data processing is not explained sufficiently
- Conditions are too long and users do not read them
- **...**





Overview of cryptography concepts







First Rule of Cryptography

Don't Implement it Yourself!

- Best left to the experts
 - Feel free to tinker
 - But don't deploy your experiments in production
- Always use a publicly scrutinized high-level crypto-library
- Crypto-library comparison:



Source: https://en.wikipedia.org/wiki/Comparison_of_cryptography_libraries



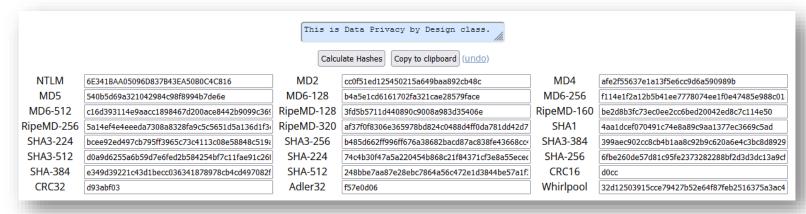
Cryptographic feature?

- Simply put: Using math to secure an application
- Cryptographic algorithms can generally be grouped by two criteria's:
 - 1. How much information must be supplied by the developer?
 - 2. What is the intended goal? (primitives to achieve):
 - Confidentiality? (use encryption)
 - Integrity? (use signature)
 - Authenticity? (use signature)
 - Non-repudiation? (use signature)
 - Deniability (or repudiation)? (use signature)



Keyless Cryptography

Hash function (one-way data transformations):



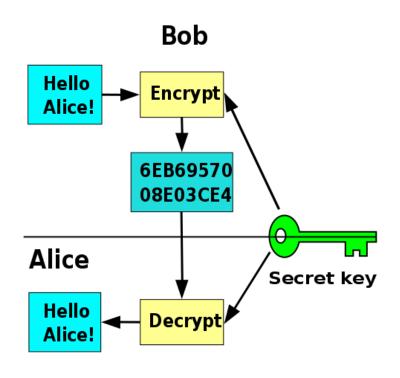
Source: https://www.browserling.com/tools/all-hashes

- Accepts one input & returns a fixed-size output (depending on the algorithm)
- Any change to the input will result in a drastically different hash output
- Cannot easily be reversed from hash output to the original message – and that's the goal



Secret Key Cryptography

- Typically require two pieces of input: The message and a secret key
 - A secret key should be a unique string of random bytes
 - The secret key must be only known to sender and intended recipient, and nobody else!



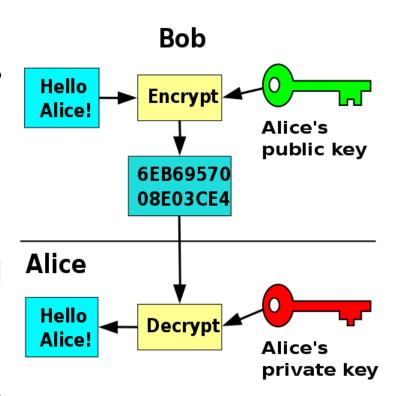
Source:

https://commons.wikimedia.org/wiki/ File:Symmetric_key_encryption.svg



Public Key Cryptography

- Unlike secret key encryption, in public key cryptography, each participant has two keys (or a keypair):
 - Private key: never shared, used for:
 - Signing a message
 - Decrypting a message
 - Public key: mathematically related to the private key, shared with everyone
 - Used for encrypting a message
 - Used for verifying digital signatures

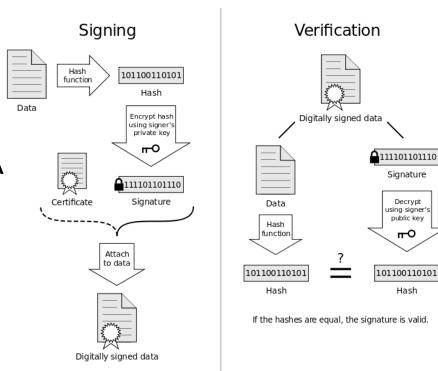


Source: https://en.wikipedia.org/wiki/Publickey_cryptography#/media/File:Public_key_encryption.svg



Digital Signatures

- A digital signature is calculated from a message and a private key:
 - Algorithm such as EdDSA (Edwards-curve Digital Signature Algorithm) or RSA (Rivest-Shamir-Adleman) are commonly used
 - Anyone else with a copy of respective public key can verify that a particular message was signed by someone's private key



Source:

https://commons.wikimedia.org/wiki/File:Digital_Signature_diagram.svg



Crypto hashes & Password hashes (don't confuse them)

Simple Hashes	Password Hash (schemes)
 Fast Only one input: The message E.g., SHA, Whirlpool, 	 Intentionally slow At least three inputs: The password A per-user salt A cost factor (how expensive to make the computation) i.e., random/fixed iterations E.g., Scrypt, Bcrypt,



Common pitfalls & good practices

- Encoding and compression algorithms are both reversible, keyless transformations of information – and are not cryptographic
- Managing/protecting keys is hard!
 - Key life cycle management (generation, distribution, rotation/destruction), compromise (or recovery, zeroization), storage, sharing agreement, ...
 - Make sure all of key management aspects are well-thought beforehand
- Do not just assume that your code providing crypto. commitments will just work
 - Perform proper testing and code review
- Check 'OWASP Top 10 privacy risks project' while determining possible data privacy risks: https://owasp.org/www-pdf-archive/OWASP_Top_10_Privacy_Countermeasures_v1.0.pdf
- > Always use trusted crypto library that has been scrutinized by experts
- Other: Instead of posting hashes, the software vendor can instead digitally sign their software package with their Private key and share their public key far and wide
 - When user downloads the file, the respective signature should also be downloaded and by using the verified public key, authenticity can be checked e.g., Minisign, GPG signature, ...

> . . .



Recommended ciphers & key length

Obsolete/Discouraged	Encouraged
RC4, DES, TDES, IDEA	AES (128, 256,)
RSA (768 , 1024) , El Gamal – DSA	RSA (2048, 4096,)
ECC (130 , 160)	ECC (224), ECDSA
MD5, SHA-0, SHA-1	SHA-2, SHA-3, Whirpool, Argon2



The crypto package

Don't implement it yourselves

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Use right key management tactics/appropriate system architecture

+

Use valid (non-obsolete) ciphers

+

Use valid (non-obsolete) cipher key lengths

+

Use reputed, publicly accepted and open-source cipher implementation

+

Keep crypto. libraries up-to-date

+

Perform testing & code review



Class exercise 3

1. Watch following video:

CPDP 2020: Privacy enhancing technologies and AI: https://www.youtube.com/watch?v=pl0oeLB370A

- 2. Write 10 points that you learned out of that video in a .txt or .doc file.
- 3. Save your .txt or .doc file and upload it to the 'Teams' assignment section (using your EPITA account).

Deadline: See 'Teams' Assignment section



Data masking

- Process of obfuscating original/sensitive data
- ▶ The two main categories include:



Anonymization

Information rendered anonymous, such that the data subject is no longer identifiable



Pseudonymization

Information rendered neither anonymous nor directly identifying



Anonymization vs Pseudonymisation

	Anonymization	Pseudonymization
Key difference (under usage scenario)	Anonymous data cannot be re-identified	Pseudonymous data allows for some form of re-identification
Data	Anonymization is mainly used for sensitive personal information such as: Names, IDs (CC, ID,), Addresses, Phone numbers, etc	Any data



Anonymization & PbD

Identity

First name: Bob Last name: Dyler Credit Card: 125 968

Unique identifiers: Apply Anonymization/ Pseudonymisation?

Other data

Age: 36 Gender: Male Nationality: Finnish Lang: C, Assembly Company: XXX

Quasi-identifiers: Apply Anonymization/ Pseudonymisation?

Full data

First name: Bob
Last name: Dyler
Age: 36
Credit Card: 125 968
Gender: Male
Nationality: Finnish
Lang: C, Assembly
Company: XXX

Pseudonymized data can be attributed when the identity is added to the data

Anonymization Techniques: Noise addition, Aggregation, ...

-> Pseudonymisation techniques can be extended to achieve anonymization



Pseudonymisation & PbD

- Pseudonymisation often satisfy requirements to implement "privacy by design and by default" and therefore is encouraged
 - Use of pseudonymous data is emphasized where personal data is used for historical or scientific research or for statistical purposes
- Data masking techniques:
 - Scrambling/Obfuscation (e.g., Name: Bob -> BBO)
 - Encryption/Hashing (e.g., Name: Tyler -> 8cbx2)
 - Substitution and/or shuffling (e.g., Credit Card no. : 125 978 -> X25 798; X=1, 97->79
 - Tokenization (e.g., Credit Card: 125 968 -> akjcn809)
 - Blurring (approximation): (e.g., Age: 36 -> Above 30)



Common data masking techniques

Category	Sub-category	Techniques	Application scenario	
		Noise addition	Numeric data	
	Randomization	Permutation Numeric data needs to be reversible	Numeric data needs to be reversible	
		Differential privacy	Big data statistics	
Anonymization		Aggregation		
	Generalization	K-anonymity Rig data statistics		
	Generalization	L-diversity	Big data statistics	
		T-closeness		
		Encryption (AES256)	Data needs to be reversible	
Pseudonymization		Hash (HMAC- SHA256)	Fixed length value	
		Tokenization	Keep data format such as ID	



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Putting it all together!

Data is a commodity

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Data Privacy by design (PbD) is essential

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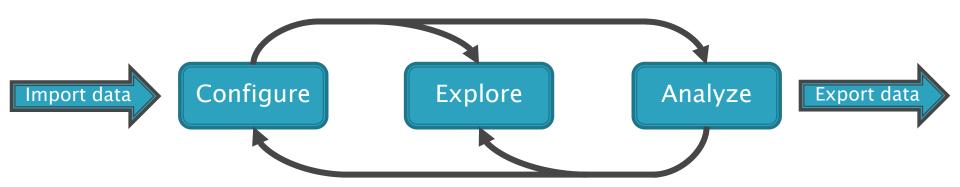
Always remember the Crypto package!

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To avoid data privacy risks, use appropriate Anonymization/pseudonymisation techniques



Class exercise 4 (ARX introduction)



- Iterative process to successively refine transformation until desired result is obtained
- Define transformation model, privacy and coding model [wizard assistance]
- Filter and analyze the solution space, and organize transformations [privacy and utility measures]
- Compare and analyze input and output, regarding risks and utility



Class exercise 4 (task)



Use 'Arx.deidentifier.org'

[Opensource; Apache "License" Version 2.0]

- Download (and install) Arx: <u>https://arx.deidentifier.org/downloads/</u>
- 2. Create a new project
- 3. Import **any example data set** (e.g., spreadsheet, csv, db file)
 - Preferably containing ~1000 entries
- 4. Perform data masking (using any transformation/technique of your choice)
- Export/download your project (firstname_lastname) & upload it to the 'Teams' assignment section (using your EPITA account)
 - If file size is ≥ 50MB, then upload it to OneDrive (make sure to grant read access to 'mohammad-salman.nadeem@epita.fr') and include the access link in 'Teams' assignment section

Deadline: See 'Teams' Assignment section



Lecture 2 ends here

- Course Slides: Go to MS Teams:
 'Data Privacy by Design Spring (S1) Spring 2022'
 -> Files section
- Send your questions by email: mohammad-salman.nadeem@epita.fr OR via direct message using MS Teams
- Thank You!

