

Personally Identifiable Information

Where (not) to find it

COM-402: Information Security and Privacy

(slide credits: Linus Gasser)

ÉCOLE POLYTECHNIQUE FÉDÉRALE DE LAUSANNE

Overview

What is Personally Identifiable Information?

- Sensitive and nonsensitive information
- Value for third parties
- Confidentiality Impact Levels
 - Definition
 - Factors to identify
- Management concepts
 - Pre-collection
 - Operating phase
 - Incident response
- Legislation in CH, Europe and US

http://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-122.pdf



Personally Identifiable Information

NIST Special Publication 800-122 defines PII as

any information about an individual maintained by an agency, including (1) any information that can be used to distinguish or trace an individual's

identity, such as name, social security number, date and place of birth,

mother's maiden name, or biometric records; and

(2) any other information that is linked or linkable to an individual, such as medical, educational, financial, and employment information.

- (1) is directly sensitive data
- (2) combines data from same service or from different services



What is Sensitive Data?

- Data that you don't want to be known by others, because:
 - It's embarrassing
 - Data about your private life
 - You might get a disadvantage if it is known
 - Medical data that could influence your job, social life, financial situation
 - Financial data (credit-card numbers)
 - It can put you in danger
 - Famous people's location
 - Allergies
 - Drone attacks
 - Medical implants



Question #1

Which of the following information is sensitive?

- A. Username and password
- B. Medical data
- C. Credit-card number
- D. Postal code
- E. Birthdate
- F. Contacts on a dating website



Breach in Sensitive Data

Ashley Madison The Observer

Life after the Ashley Madison affair

It's six months since hackers leaked the names of 30 million people who had used the infidelity website Ashley Madison. Resignations, divorces and suicides followed. Tom Lamont sifts through the wreckage





• End of the affairs: at the time of the leak, Ashley Madison claimed to have 37.6m members, all of them assured the site was totally discreet.



Ashley Madison Hack Stats

- 37 Million Number of Ashley Madison member account files that were criminally hacked worldwide
- 30 Days Number of days the Ashley Madison hackers gave Avid Life Media to shut down its site
- 10 Gigabytes Number of approximate gigabytes of the Ashley Madison hackers first release of stolen information
- 20 Gigabytes Number of approximate gigabytes of the Ashley Madison hackers second release of stolen information
- 300 Gigabytes The number of gigabytes of stolen Ashley Madison information the hackers claim to have taken in total
- 47 Countries The number of countries Ashley Madison operates in
- \$500 000 The reward offered by Ashley Madison for information leading to the arrest of the criminal hackers
- 3.7 million The number of estimated emails that have not been cracked from the Ashley Madison hack, thanks to strong user-created passwords

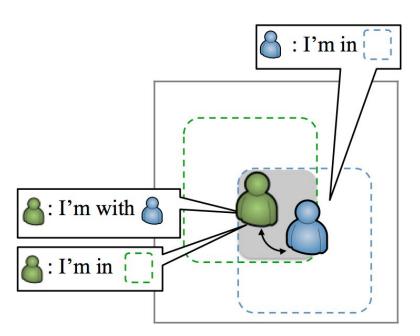


How Nonsensitive Info gets Sensitive

- By combining different sources:
 - colocation and position of the other party
 - o Pseudonymous comments on discussion-forum and disclosure of full name on another site
 - Anonymised database of movie-preferences and comments on movie-site like tomato
- By re-defining what is sensitive
 - Your job-description just got under scrutiny from government



Co-Location and Position



https://infoscience.epfl.ch/record/198297?ln=en



Reveals its position if position of Is known



Co-location can be inferred from

- Face-recognition on pictures
- IP-addresses when connecting to a service
- Available WLAN or GSM networks

So even if only

has his GPS on, the

position of



can be inferred.



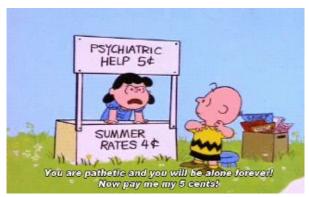
Why is Location so Privacy Sensitive?





Text messages warn Ukraine protesters they are 'participants in mass riot'

Mobile phone-users near scene of violent clashes in Kiev receive texts in apparent attempt by authorities to quell protests

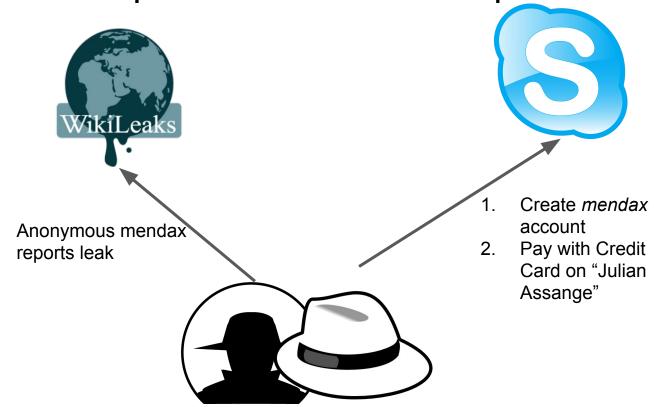




"Dear subscriber, you are registered as a participant in a mass riot."

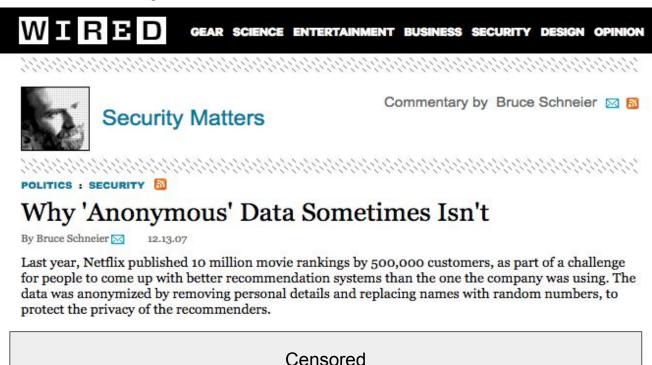


Common Unique Data - Fake Example!





Netflix De-Anonymization





Netflix Published Data - Anonymization

User	Movie	Date	Grade	
Foo	The Wall	1/2/2003	5/5	
Bar	Temps present	1/4/2004	4/5	
Foo	Big Bang Theory	1/5/2004	4/5	
Bar	Big Bang Theory	1/5/2004	5/5	
Foo	Brazil	1/1/2002	4/5	

User	Movie	Date	Grade
1234	554433	1/2/2003	5/5
4321	334455	1/4/2004	4/5
1234	16180	1/5/2004	4/5
4321	16180	1/5/2004	5/5
1234	773311	1/1/2002	4/5



Question #2

How do you think researchers de-anonymized the Netflix-data?

- A. Breaking into the Netflix-database
- B. Combining with other movie-related data
- C. Machine-learning on the data
- D. Breaking the hash used to anonymize the users



Netflix De-Anonymization





Security Matters

Commentary by Bruce Schneier M 5



POLITICS : SECURITY

Why 'Anonymous' Data Sometimes Isn't

By Bruce Schneier 12.13.07

Last year, Netflix published 10 million movie rankings by 500,000 customers, as part of a challenge for people to come up with better recommendation systems than the one the company was using. The data was anonymized by removing personal details and replacing names with random numbers, to protect the privacy of the recommenders.

Arvind Narayanan and Vitaly Shmatikov, researchers at the University of Texas at Austin, deanonymized some of the Netflix data by comparing rankings and timestamps with public information in the Internet Movie Database, or IMDb.



De-Anonymization - 1/2

User	Movie	Date	Grade
1234	554433	1/2/2003	5/5
4321	334455	1/4/2004	4/5
1234	16180	1/5/2004	4/5
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User	Movie	Date	Grade
Foo	The Wall	1/2/2003	4/5
Foo	Big Bang Theory	1/5/2004	4/5
Foo	Brazil	1/1/2002	4/5

IMDb

Netflix



De-Anonymization - 2/2

User	Movie	Date	Grade
Foo	The Wall	1/2/2003	5/5
Foo	Big Bang Theory	1/5/2004	4/5
Foo	Brazil	1/1/2002	4/5
Foo	Knightrider	1/6/2005	5/5

Attacker learns this new information



Re-defining what is sensitive

- Change of government and change of policy
 - Trump's government asking who visited clima-conferences
- If DNA is available and insurance companies find correlations between Genes and Illness
- https://www.theguardian.com/world/2014/jan/21/ukraine-unrest-text-message s-protesters-mass-riot



Value for Third Parties



Google: Serve better ads

Medical: Better treatments

Government: Better services

Ransom on divulging information Identity-theft or selling the data Killing in case of enemies of the state





Abusing PII to Hack



HOW APPLE AND AMAZON SECURITY FLAWS LED TO MY EPIC HACKING





State Data, Business Data, and PII

Low protection

High protection

Low transparency





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Confidentiality Impact Levels

From NIST: The PII confidentiality impact level - low, moderate, or high - indicates the potential harm that could result to the subject individuals and/or the organization if PII were inappropriately accessed, used, or disclosed.

Impact levels

- Low limited adverse effect
- Moderate serious adverse effect
- High severe or catastrophic adverse effect

Factors to identify

- Identifiability
- Quantity of PII 25 records or 25 million records?
- Sensitivity



Impact Levels

Low	Moderate	High	
limited adverse effect - cause a degradation in mission capability - result in minor damage to organizational assets - result in minor financial loss - result in minor harm to individuals.	serious adverse effect - cause a significant degradation in mission capability - result in significant damage to organizational assets - result in significant financial loss - result in significant harm to individuals that does not involve loss of life or serious life threatening injuries	severe or catastrophic - cause a severe degradation in or loss of mission capability - result in major damage to organizational assets - result in major financial loss - result in severe or catastrophic harm to individuals involving loss of life or serious life threatening injuries	

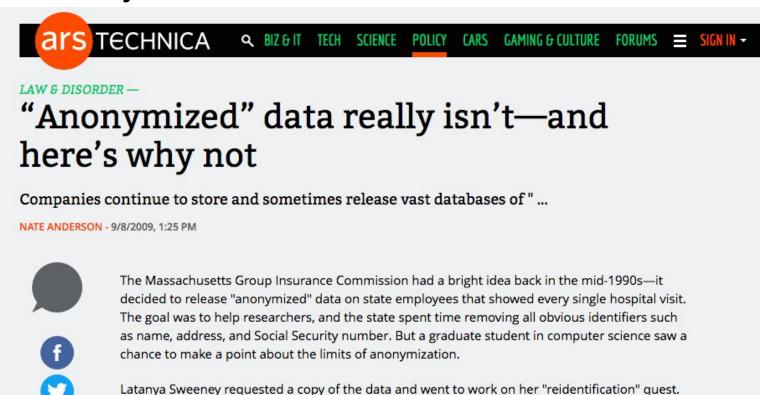


Factors to Identify

- Identifiability
 - Direct identifiability like Social Security, AHV-numbers (Switzerland)
 - Also consider linked PII if the attached data has a high impact level
- Quantity of PII 25 records or 25 million records?
 - Higher numbers give higher impact level
 - Don't neglect lower numbers
- Sensitivity
 - Consider data-fields in the context of other fields
 - Credit-card # alone has a low impact level, together with a name it's moderate
- Context of Use
 - What is the purpose of the collection?
 - Tel.-# and name mailing-list: low retirement benefits: moderate undercover agents: high



Identifiability with Postal Codes



It didn't prove difficult. Law professor Paul Ohm describes Sweeney's work:



How to De-Anonymize

At the time GIC released the data, William Weld, then Governor of Massachusetts, assured the public that GIC had protected patient privacy by deleting identifiers. In response, then-graduate student Sweeney started hunting for the Governor's hospital records in the GIC data. She knew that Governor Weld resided in Cambridge, Massachusetts, a city of 54,000 residents and **seven ZIP codes**. For twenty dollars, she purchased the complete voter rolls from the city of Cambridge, a database containing, among other things, the **name**, address, ZIP code, birth date, and sex of every voter. By combining this data with the GIC records, Sweeney found Governor Weld with ease. Only six people in Cambridge shared his birth date, only three of them men, and of them, only he lived in his ZIP code. In a theatrical flourish, Dr. Sweeney sent the Governor's health records (which included diagnoses and prescriptions) to his office.



NIST-Example: Intranet Activity Tracking

A company is logging the following information of **intra**web access:

- A. The user's IP address
- B. The URL and referring URL
- C. The date and time the user accessed the web site
- The web pages or topics accessed within the organization's web site (e.g., organization security policy)

Question #3 - What is Identifiable Information?

F. None of all



Linked PII

Knowing the company has a log of

user IDs and corresponding IP addresses

Question #4

How do you evaluate the PII confidentiality impact level of this data now?

- A. Low
- B. Medium
- C. High
- D. I don't know



Question #5 - SpeakUp Discussion

Look at slide "Evaluation of a Chat-Application" and discuss what information has a moderate or high impact level and how it could be made less impacting.



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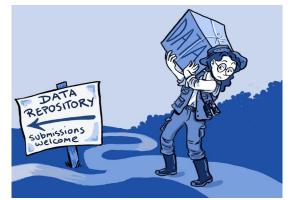
Management Concepts

- Pre-collection
 - What and why information is to be collected
- Operating phase
 - Put protective measures into place (encryption, separation)
 - De-identify or anonymize data (store age without reference for statistics)
 - Don't exchange unnecessary data (Facebook ad-services)
- Incident response
 - Preparation
 - Detection and Analysis
 - Containment, Eradication, and Recovery
 - Post-Incident Activity



Pre-Collection

- Before starting to collect the data
- Design-phase of project
- According to the service, define
 - What information is to be collected
 - Why the information is being collected
 - The intended use of the information
 - With whom the information will be shared
 - How the information will be secured.



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Evaluation of a Chat-Application

What	Full name	Telephone-#	Birthday	Contacts	Credit Card
Why	Greeting, make contacts	Verify user	Verify offers	Write messages - get to know app	Additional offers
Intended use	Show	First-contact	Birthday greetings	Write to all contacts	Pay special offers
Shared with	Everybody	Friends	Everybody	Everybody	nobody
Securing with					Encrypted



Evaluation of a Chat-Application

What	Full name	Telephone-#	Birthday	Contacts	Credit Card
Why	Greeting, make contacts	Verify user	Verify offers	Write messages - get to know app	Additional offers
Intended use	Show	First-contact	Birthday greetings	Write to all contacts	Pay special offers
Shared with	Everybody	Friends	Everybody	Everybody	nobody
Securing with					



Evaluation of a Chat-Application

What	Full name	Telephone-#	Birthday	Contacts	Credit Card
Why	Greeting, make contacts	Verify user	Verify offers	Write messages - get to know app	Additional offers
Intended use	Show	First-contact	Birthday greetings	Ask if write to all contacts	Pay special offers
Shared with	Everybody	Friends	Friends	Nobody	nobody
Securing with		Hashed	Only keep day/month	Delete on server	Encrypted



Operating Phase - Protective Measures

Encryption

- At rest storing data with a global encryption key
 - Where to store that key?
- In transit using TLS, VPN
 - Even inside data-centers
- In Use homomorphic crypto, mostly exotic
 - What DEDIS/LCA are working on

Separation

- Don't store all data in the same place
- De-identify data and, if needed, re-identify



© Can Stock Photo - csp12505550



Operating Phase - De-Identify or Anonymize

- Generalizing the Data
 - Only store if age > 18 or not
- Suppressing the Data
 - o Once the telephone-number is verified, delete it
- Introducing Noise into the Data
 - Add random noise to search results
- If only needed for statistics, you can
 - Swap the data of users
 - Only store the average



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Introducing Noise in Data

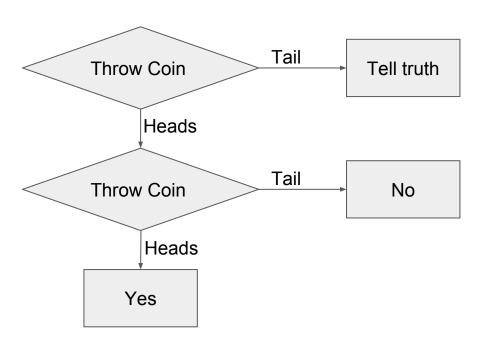


APPLE'S 'DIFFERENTIAL PRIVACY' IS ABOUT COLLECTING YOUR DATA—BUT NOT YOUR DATA



Senior vice president of software engineering Craig Federighi. 🙆 JUSTIN KANEPS FOR WIRED

Did you ever break the law?





Operating Phase - Default: No Exchange

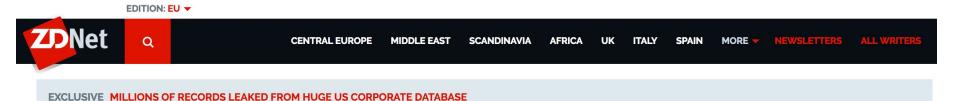
- With whom you want to exchange data
 - What data you want to exchange
 - o Is it anonymized?
- Does the third party need access?
 - Google lets you define adwords, but never shows searches
 - Facebook at some time let you access user profiles
 - -> third party might only need confirmation: "sent x ads"



© Can Stock Photo - csp12505550



Leakage of data



Facebook apps have been accidentally leaking user data for years

Facebook has fixed a flaw affecting hundreds of thousands of its apps. You should still change your Facebook password though.



By Emil Protalinski for Friending Facebook | May 10, 2011 -- 15:15 GMT (16:15 BST) | Topic: Social Enterprise

http://www.zdnet.com/article/facebook-apps-have-been-accidentally-leaking-user-data-for-years/



Preparation

- Our How to report?
- Who is in charge for leading? What resources are available?
- What data can we collect to help detection? What backups are available?

Detection and Analysis

- Save all logs and state of servers
- Investigate

Containment, Eradication, and Recovery

- Should fake data be provided?
- Restore from backups

Post-Incident Activity

• What to improve for next time?





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Preparation

- Regularly go through exercise
 - O What are the most common attacks?
 - O Who should be informed?
 - Internally hierarchy, IT
 - Clients working with our data
 - Other customers
- For some kind of organizations, the state wants specific informations
- Have logs, lots of logs
- Make backups and verify them

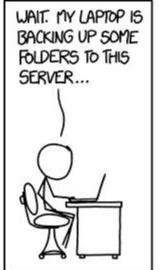


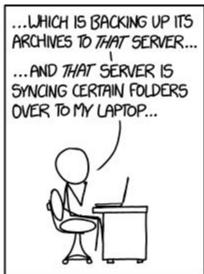


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A Word on Backups









https://xkcd.com/1718/

Maybe you should keep FEWER backups; it sounds like throwing away everything you've done and starting from scratch might not be the worst idea.



Detection and Analysis

- Follow prepared plan
- Make backups of all available logs and data
 - Only work on those copies
 - For virtual machines, take a snapshot
- If it's a high-value target
 - Don't show you know what's going on
 - Set up fake data
- Start investigation
 - Contact people defined in plan
 - Inform state agencies



Containment, Eradication, and Recovery

Containment

- If possible, remove sensible data from network
- Should fake data be provided?

Eradication

- Re-install systems
- Make sure they don't get infected again
- Implement protection against threats discovered

Recovery

- Find out if those backups work
- Verification
 - No re-infection?

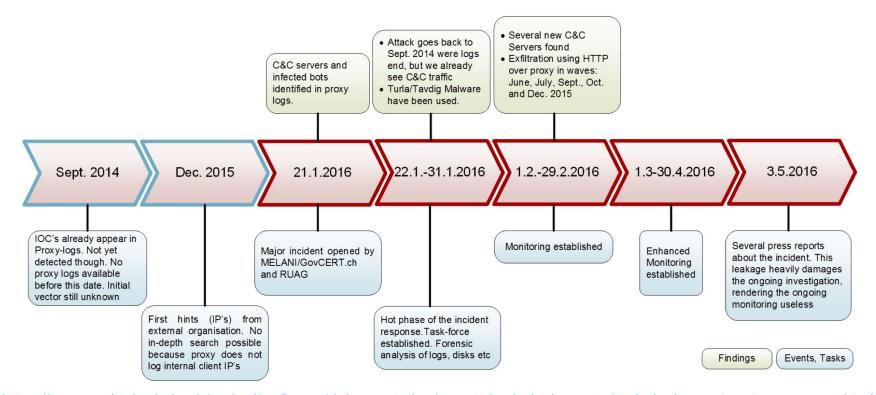


Post-Incident Activity

- What to improve for next time?
- Monitor better for new attack
 - Take new logs
 - Lessen attack surface
- Protect against discovered attacks
- Change data storage
 - Anonymize data
 - Don't store data

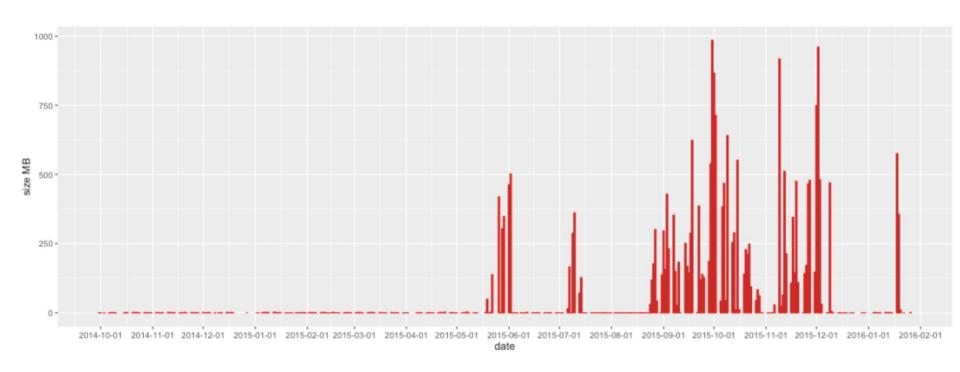


Example from **RUAG** incident

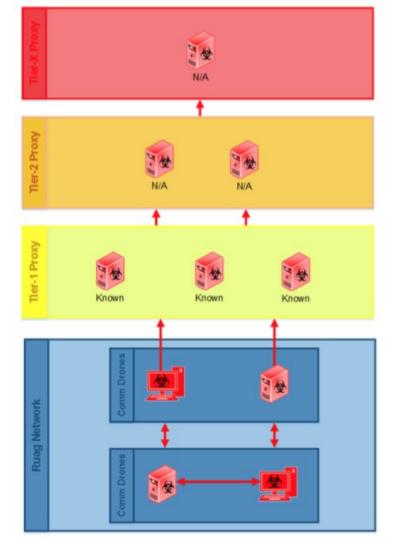




Data Exfiltrated



Proxy Tier Topology







Question #6

What part of the preparation-phase should have been done better in RUAG?

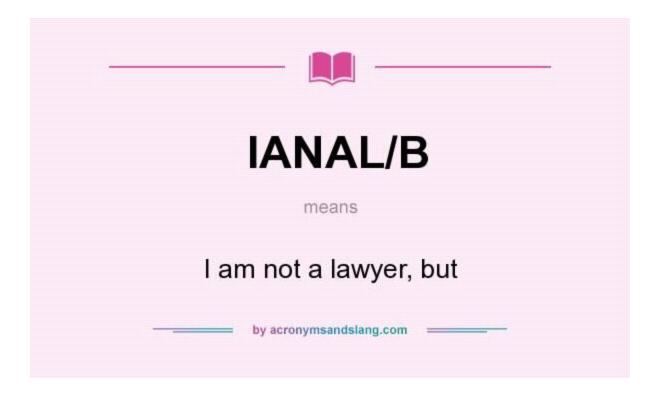
- A. Better backups
- B. Listing of servers and workstations
- C. Logging at the proxy
- D. Traffic analysis



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Legislation in CH, Europe and US

One for protection, one for openness of your and the government's data

- CH
 - The Federal Act on Data Protection, FADP
 - Freedom of Information Act, FolA
- Europe
 - General Data Protection Regulation, GDPR
 - Data Protection Directive, DPD
- US
 - Health Insurance Portability and Accountability Act, HIPAA
 - Privacy Act of 1974 (Updated since then...)



Swiss Privacy Laws - FADP

- The Federal Act on Data Protection, FADP, applies to personal data, that is, all information relating to an identified or identifiable person, whether natural or legal
 - Bundesgesetz über den Datenschutz, DSG
 - Loi fédérale sur la protection des données, LPD
 - Legge federale sulla protezione dei dati, LPD

http://uk.practicallaw.com/9-502-5369?source=relatedcontent# https://www.admin.ch/opc/en/classified-compilation/19920153/index.html



Swiss Privacy Laws - FADP

Regulated acts on data

- Collection of data.
- Storage of data.
- Use of data.
- Revision of data.
- Disclosure of data.
- Archiving of data.
- Destruction of data.

Jurisdictional scope

- Data subject has its habitual residence in Switzerland
- Data processor has its habitual residence or registered office in Switzerland.
- Damage resulting from the data process is sustained in Switzerland



Swiss Privacy Laws - FolA

- Freedom of Information Act, FolA
 - Öffentlichkeitsgesetz, BGÖ
 - Loi sur la transparence, LTrans
 - Legge sulla trasparenza, LTras
- Governs the data the government has to publish
- Does not apply to private companies





https://www.youtube.com/watch?v=5ByVaZ0rg8U&feature=youtu.be



EU General Data Protection Regulation

https://en.wikipedia.org/wiki/General Data Protection Regulation

- Applies to you if the data controller or processor (organization) or the data subject (person) is based in the EU
- Responsibility and accountability
 - Algorithmic decision-making is punishable
 - Privacy by Design, setting must be "high" by default
- "Opt-in" instead of "Opt-out" for data usage
- Data breaches must be reported within 72 hours
- Right to be forgotten



EU - DPD

Data Protection Directive for the police and criminal justice sector that provides robust rules on personal data exchanges at national, European and international level

- 1. Notice data subjects should be given notice when their data is being collected
- 2. Purpose data should only be used for the purpose stated and not for any other purposes
- 3. Consent data should not be disclosed without the data subject's consent
- 4. Security collected data should be kept secure from any potential abuses
- 5. Disclosure data subjects should be informed as to who is collecting their data
- Access data subjects should be allowed to access their data and make corrections to any inaccurate data
- 7. Accountability data subjects should have a method available to them to hold data collectors accountable for not following the above principles



EU - Freedom Act?



7 Mar 2017

Open letter: direct and indirect lobbying needs to be better regulated

By FDR

European Digital Rights (EDRi) and more than 100 civil society organisations joined the Alliance for Lobby Transparency and Ethics Regulation (ALTER-EU), Civil Society Europe and Transparency International EU in sending a letter on lobby transparency.

The letter was sent to the key MEPs concerned with the interinstitutional negotiations to review of the <u>EU Transparency Register</u>. This letter is important as big business lobbying practices are having an undue influence over EU policy-makers. If we want digital rights and citizens' interests to be respected, lobbying needs to be strictly regulated.

In the letter, we ask:

- . MEPs not to meet with unregistered lobbyists;
- · for more resources to the EU lobby register secretariat;
- for the definition of lobbying to cover direct and indirect influence EU policy- and decision-making;
- · to make the transparency registration obligatory.

DONATE →	
BECOME A SUPPORTER =	
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EDDL ODAM	SUDI
EDRI-GRAM →	
fortnightly roundup of the	news
-	news
-	news
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fortnightly roundup of the Enter your email AGENDA 24.03.2017	
Enter your email AGENDA	subn
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US Privacy Laws

Not 1, but many privacy laws



https://www.teachprivacy.com/problems-sectoral-approach-privacy-law/



US - HIPAA

- Health Insurance Portability and Accountability Act regulates medical information.
- Applies to
 - health care providers
 - data processors
 - pharmacies
 - other entities that come into contact with medical information.
- Governs collection and use of protected health information (PHI).
- HIPAA Security Rule provides standards for protecting medical data.
- HIPAA Transactions Rule applies to the electronic transmission of medical data.



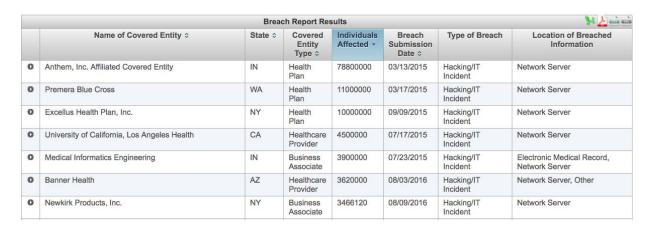
US - Wall of Shame

File a Breach | HHS | Office for Civil Rights | Contact U.S. Department of Health and Human Services Office for Civil Rights Breach Portal: Notice to the Secretary of HHS Breach of Unsecured Protected Health Information

Breaches Affecting 500 or More Individuals

As required by section 13402(e)(4) of the HITECH Act, the Secretary must post a list of breaches of unsecured protected health information affecting 500 or more individuals. These breaches are now posted in a new, more accessible format that allows users to search and sort the posted breaches. Additionally, this new format includes brief summaries of the breach cases that OCR has investigated and closed, as well as the names of private practice providers who have reported breaches of unsecured protected health information to the Secretary. The following breaches have been reported to the Secretary:

Show Advanced Options



https://ocrportal.hhs.gov/ocr/bre ach/breach report.jsf



US - Privacy Act of 1974

• Wikipedia:

- It establishes a Code of Fair Information Practice that governs the collection, maintenance, use, and dissemination of personally identifiable information about individuals that is maintained in systems of records by federal agencies.
- Each agency that maintains a system of records shall
 - upon request by any individual ... permit him ... to review the record and have a copy made of all or any portion thereof in a form comprehensible to him ...
 - permit the individual to request amendment of a record pertaining to him ...[2]



US - Freedom of Information Act

Scope

The act explicitly applies only to executive branch government agencies.

Nine exceptions

- State secrets for national security
- Trade secrets
- Invasion of privacy

Wikipedia:

The <u>Center for Effective Government</u> (now superseded by <u>POGO</u>) analyzed 15 federal agencies which receive the most FOIA requests in-depth. It concluded, that federal agencies are struggling to implement public disclosure rules.



Legislation in CH, Europe and US - Links

- CH
 - Federal Act on Data Protection
 - Freedom of Information Act

Europe

- http://ec.europa.eu/justice/data-protection/index_en.htm
- http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf
- https://www.access-info.org/

US

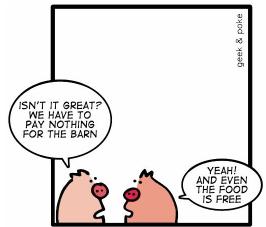
- https://en.wikipedia.org/wiki/Health_Insurance_Portability_and_Accountability_Act
- https://en.wikipedia.org/wiki/Privacy_Act_of_1974
- https://en.wikipedia.org/wiki/Freedom_of_Information_Act_(United_States)
- http://pogo.org Project on Government oversight



Conclusion

For Users

- Take care where you leave a trail
- PII is not where you think it is
- Remove data / only enter required data
- if you're not paying for the product, you are the product



For Organizations

- PII can pop up in unexpected places
- If you don't collect data, it cannot be stolen
- Prepare for failure it will happen
- Be aware of PII-requirements in your country



A Summary of Your Online Privacy

