

École Pour l'Informatique et les Techniques Avancées – **EPITA**

Masters program

Course: Data Privacy by Design



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Data Privacy by Design (DPbD)

Course schedule (tentative)

Date	No.	Topics	Duration (in hours)
(check Zeus platform for the date & time)	1	Introduction, DPbD fundamentals with case studies	3
(check Zeus platform for the date & time)	2	Data privacy risks, Crypto. Package, Data masking (Anonymization vs Pseudonymisation)	3
(check Zeus platform for the date & time)	3	Privacy Enhancing Technologies (PETs), DPbD and General Data Protection Regulation (GDPR)	3
(check Zeus platform for the date & time)	4	Recap, Conclusion	3
(check Zeus platform for the date & time)	5	Final evaluation	3
<i>Total</i>			<i>15 hours</i>

GRADING criteria:

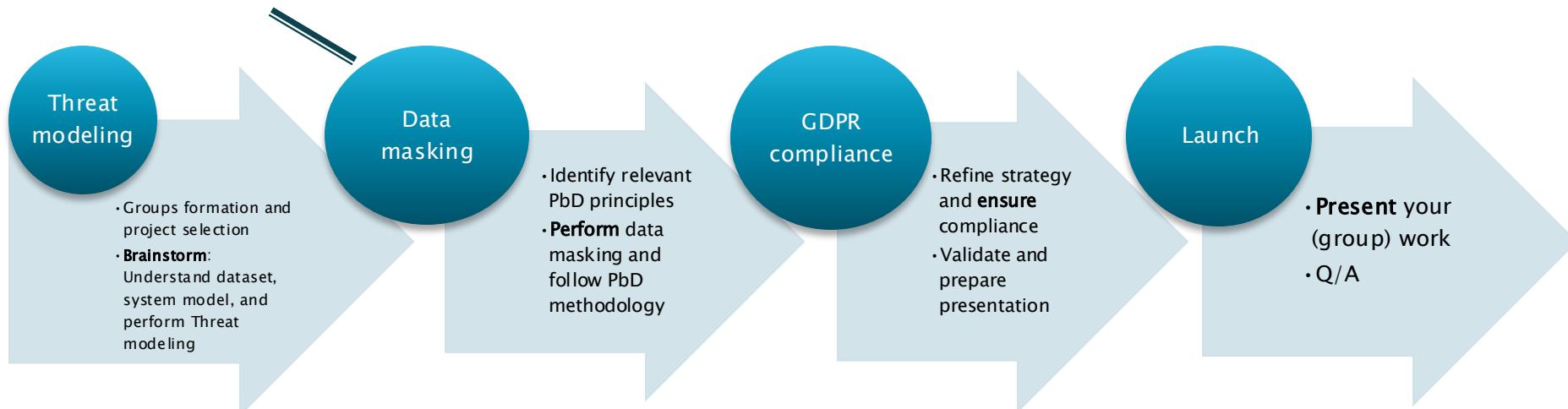
Class participation comprising attendance & reactivity: 10%

Class activities (quizzes): 30%

Final project (individual report & group presentation): 60%

Lecture 2 Outline

1. Common data privacy risks
 2. Crypto package
 3. Data masking (Anonymization vs Pseudonymisation)
 4. Privacy Enhancing Technologies (PETs)
- QUIZ



Hands-on → Final project

OWASP Top 10 Privacy Risks project

#	Type	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		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		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		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		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		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		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		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.
P10		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>

OWASP Top 10 Privacy Risks project (Some Examples)

P2: Operator-sided Data Leakage

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

Dark archives

Shadow IT

...

P5: Non-transparent Policies, Terms & Conditions

- ▶ Privacy Policies (PP), Terms & Conditions (ToU/ToS) are not up-to-date, inaccurate, incomplete or hard to find
 - Data processing is not explained sufficiently
 - Conditions are too long and users do not read them

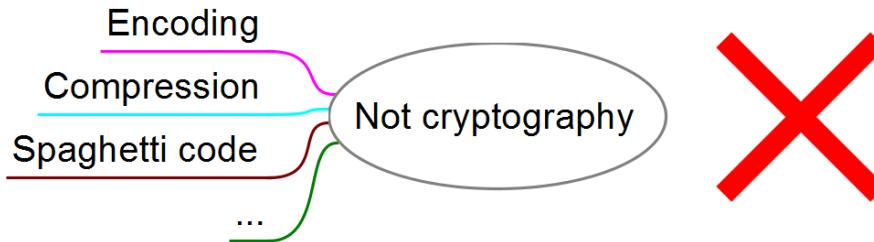
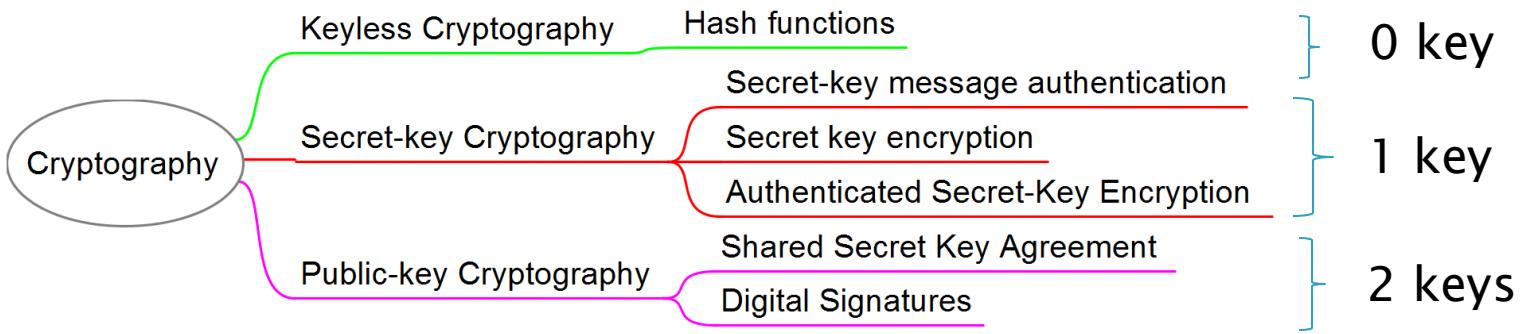


Source: <https://commonterms.org>

Useful projects:

- Polisis (AI-powered summary of PP/ToS/ToU)
- <https://tosdr.org> (PP & ToS grades)

Overview of cryptography concepts



Cryptographic feature?

- Simply put: Using **Mathematics** 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**)

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 example:

Name of implementation	Initiative	Main implementation language	Open-source software	Software license	Latest release
Botan	Jack Lloyd	C++	Yes	Simplified BSD	3.2.0 (October 9, 2023; 7 months ago ^[1]) [±]
Bouncy Castle	Legion of the Bouncy Castle Inc.	Java, C#	Yes	MIT License	Java 1.77 / November 13, 2023; 6 months ago ^[2] Java BC-LJA 2.73.5 / March 1, LTS 2024; 3 months ago ^[3] Java BC-FJA 1.0.2.4 / FIPS September 28, 2023; 8 months ago ^[4] C# 2.3.0 / February 5, 2024; 4 months ago ^[5] C# BC-FNA 1.0.2 / FIPS February 28, 2023; 15 months ago ^[6]

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

Keyless Cryptography

- ▶ Hash function (one-way data transformations):
 - 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
 - Must not be reversed from hash output to the original message – and that's the goal

This is a Data Privacy by Design course.		This is a Data Privacy by Design course	
NTLM	D344DA38CA9A849AC7CE933CF8816A9	NTLM	4BED3AE678128E067FD7CC6DA0C0C09C
MD2	efb8C76cac52de8d3047a84570c62dfc	MD2	7cb2628f341a9ea5cc620dcda70548d22
MD4	f1b4f3b1d8dac056be41298530669228	MD4	d7736018938c29deb52686f4a4de53fd
MD5	4cb0aed0e844bbb5dede0b041b1bd9c9	MD5	8900db7e2ccd08850b6d5d8f2800a322
MD6-128	9d61709b20907e771564c81be23b050d	MD6-128	efe77d271214f255917c286fcf7771a
MD6-256	0a161fbd18faf7a9d4aee42d26e28fd0aaacd9ec66	MD6-256	ceb1a1969345c3600e1e2114e3e213174e7cae0
MD6-512	ab266a8682f1b6573244d2c6a1dd70bab2896b7051,	MD6-512	8312565da4ae4b1ef790bc2e6c02ea46144d93e222:
RipeMD-128	10fa02afa253c0804203c2340ce596e8	RipeMD-128	534b1c63b6582eaf97ab03ee163c7592
RipeMD-160	b9fiae202a671c8be0d191add94a1aaaf9400f225c	RipeMD-160	cbb5d6eebd1b39702f13093c31cf992cca4df6a3
RipeMD-256	8c6885c2a70ba9c33a506d0e152a9082203372996,	RipeMD-256	5ffaf5ecb87c3dfa76c18fa896e53c45b78b382f
RipeMD-320	4b08a8b92a443e013d8722c9866ae25889c6c48919	RipeMD-320	e347573a8bf0f9175eb48a30f47bfffcc196a4e2d8f95
SHA1	35ea2f90c2e5dbcb16d6ba975770c6e4b14cd7f	SHA1	3de44e7bf132edc0a73c62cc658c1bc562f6e8f7
SHA3-224	8738bbb2f2e884826dab4475313f2c2d50277239c9	SHA3-224	cdd9309f7a2495d67e0bf641e2847cf399c706db9:
SHA3-256	efe869c0fe7ad70561053b773257e505db6b0296e6c	SHA3-256	4c1fe6da1050490624c6398fb9e98c8b7dde7ae42
SHA3-384	2da311c3b1e8f5c9aec55a5fffb164200fee612f79bc	SHA3-384	8afe7feb867c3fb1bab299435014e222c557f3298e;
SHA3-512	8a460dcdd445bfff14953547fb06f593243c7a96323f8	SHA3-512	f0fe09da0d151a9e2567a3d548e36fb48de04d902ff
SHA-224	3b5d6f6184caa7b7f77c006f659b279352c08605cb5;	SHA-224	0916a176a6550d62cf61496bc43021a7cb14ad0350,
SHA-256	e8b9b0c41653bd0d28c8d773226cba258376bb02,	SHA-256	bb210dc16227ac8b9ab6d20930f9a5adedd0d2c0f92
SHA-384	1339770b05bd2cc10f8e57c39ad3fd0830229f9bbb3t	SHA-384	71119c244db38fb715f5589751dcfd95aa976c5abe
SHA-512	6809d0627fa3abc91e61d063a8106bfbd299c1f75c53;	SHA-512	577a3bc7e4af3010ba1272df1ddf9e9ab3f882a6781:
CRC16	d349	CRC16	0815
CRC32	48cc9f3	CRC32	71c0c8af
Adler32	190bbe02	Adler32	0b090dd4
Whirlpool	ecb55c617dd84e40504103a0d7973810198523073a	Whirlpool	682b895f1a8c6ea518aab89048041e6cd51e9f78c05

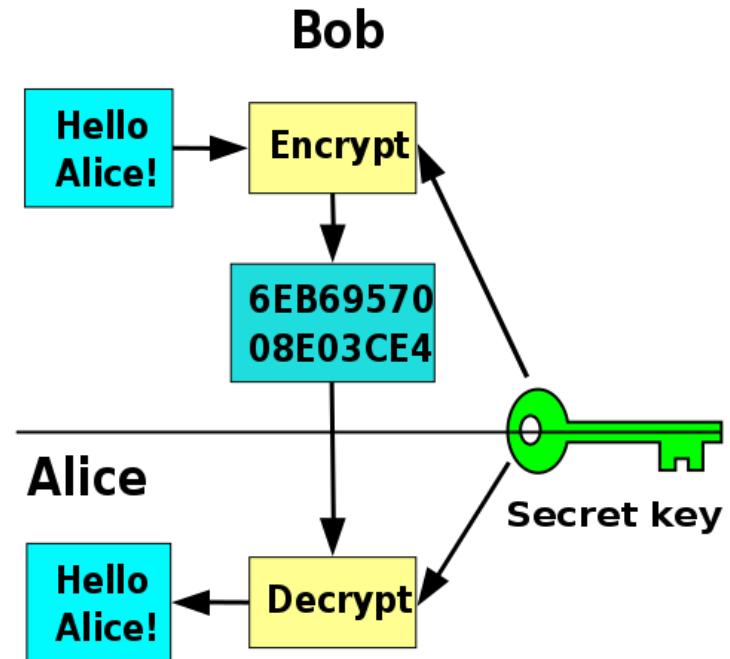
Source: <https://www.browserling.com/tools/all-hashes>

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

Simple Hashes	Password Hash (schemes)
<ul style="list-style-type: none">• Fast• Only one input: The message• E.g., SHA, Whirlpool, ...	<ul style="list-style-type: none">• Intentionally slow• At least three inputs:<ol style="list-style-type: none">1. The password2. A per-user salt3. A cost factor (how expensive to make the computation) i.e., random/fixed iterations• E.g., Scrypt, Bcrypt, Argon2

Secret Key Cryptography

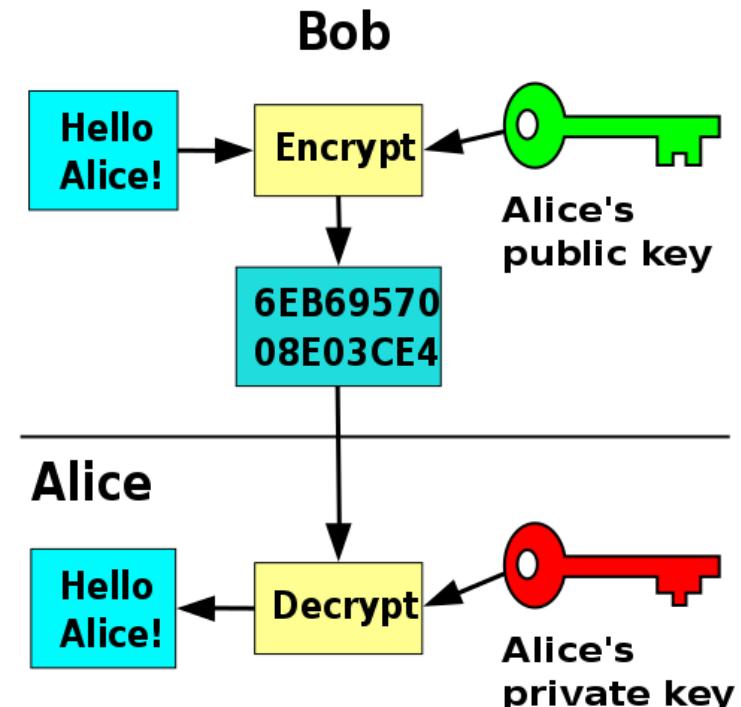
- Typically require two pieces of input: The message and a secret key
 - A secret key should be a unique string of random bytes
 - The secret key must be only known to sender and intended recipient, and nobody else!



Source:
[https://commons.wikimedia.org/wiki/
File:Symmetric_key_encryption.svg](https://commons.wikimedia.org/wiki/File:Symmetric_key_encryption.svg)

Public Key Cryptography

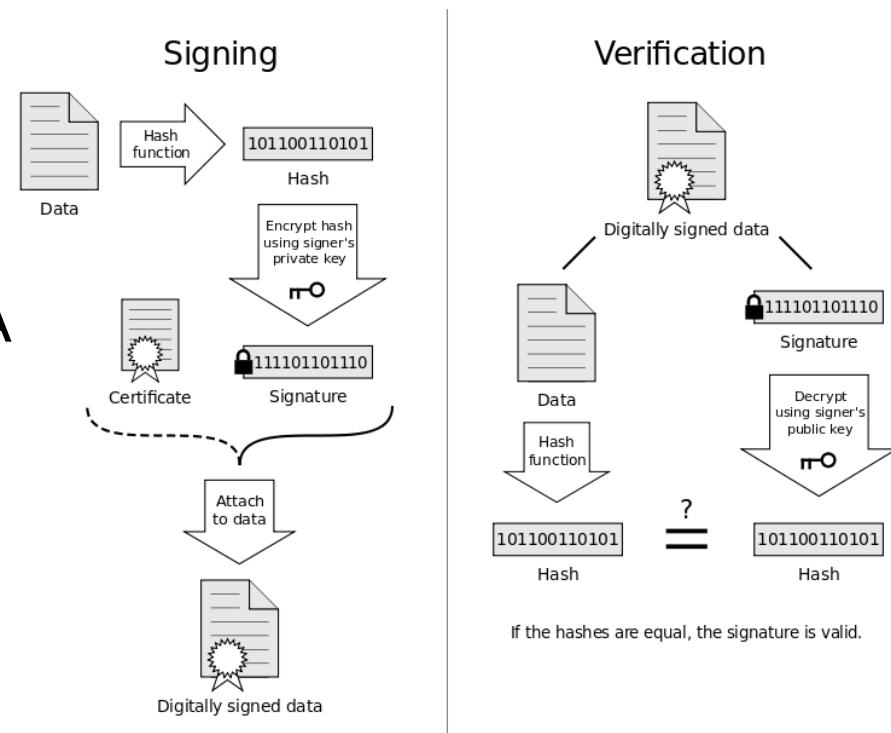
- ▶ Unlike secret key encryption, in public key cryptography, each participant has two keys (or a keypair):
 - **Private key:** never shared, used for:
 - Signing a message
 - Decrypting a message
 - **Public key:** mathematically related to the private key, shared with everyone
 - Used for encrypting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



Source: https://en.wikipedia.org/wiki/Public-key_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

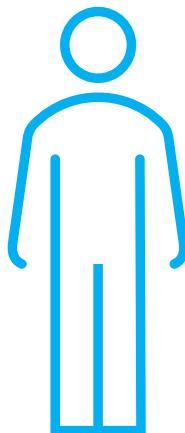


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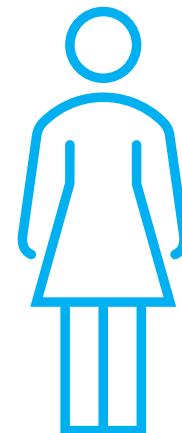
[https://commons.wikimedia.org/wiki/
File:Digital_Signature_diagram.svg](https://commons.wikimedia.org/wiki/File:Digital_Signature_diagram.svg)

Open exercise

- ▶ Propose a secure and private protocol enabling two parties to communicate:



Bob

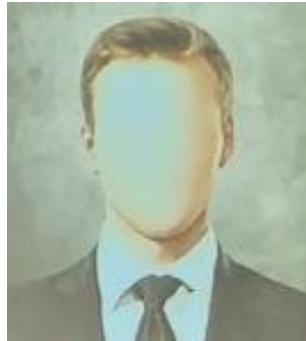


Alice



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

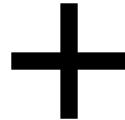
Anonymization vs Pseudonymisation

Key difference	Anonymization	Pseudonymization
Concept	Data should not be re-identifiable	Data should allow for some form of re-identification
Data	Mainly used for sensitive personal information such as: Names, IDs (CC, ID, ...), Addresses, Phone numbers, etc	Any data
Usage scenario	Mostly one-time (e.g., passing data to a 3 rd party). Preferable in cases where Personal data (and the legal obligation to protect it) should no longer exist	Mostly multi-time (e.g., operational/ Transactional data). Preferable in cases when Personal data is needed at different stages of processing

Anonymization in a Glance

Identity

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



Other data

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



Full data

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

Unique identifiers:
advisable to anonymize

Quasi-identifiers:
advisable to pseudonymize

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

Anonymization techniques, including noise addition and data aggregation, may lead to a reduction in the dataset's utility.
→ Maintaining the desired level of utility in the anonymized dataset is of paramount importance!

Pseudonymisation & Data masking (in general)

- ▶ Pseudonymization is used when re-identification is necessary for the purpose of processing:
 - When personal data is utilized for transactional operations (e.g., handling in a relational database)
- ▶ Data masking techniques (miscellaneous):
 - Scrambling/Obfuscation (e.g., Name: Bob -> KC0)
 - 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)
 - ...

Data masking techniques (categorization)

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

Source: Hands-On Security in DevOps – Tony Hsu (2018), Chapter 6 (Security Architecture and Design Principles): Data masking (Page 99)
 Referenced from Art. 29 WP ([now EPDP](#)) opinion (0829/14/EN – WP216)

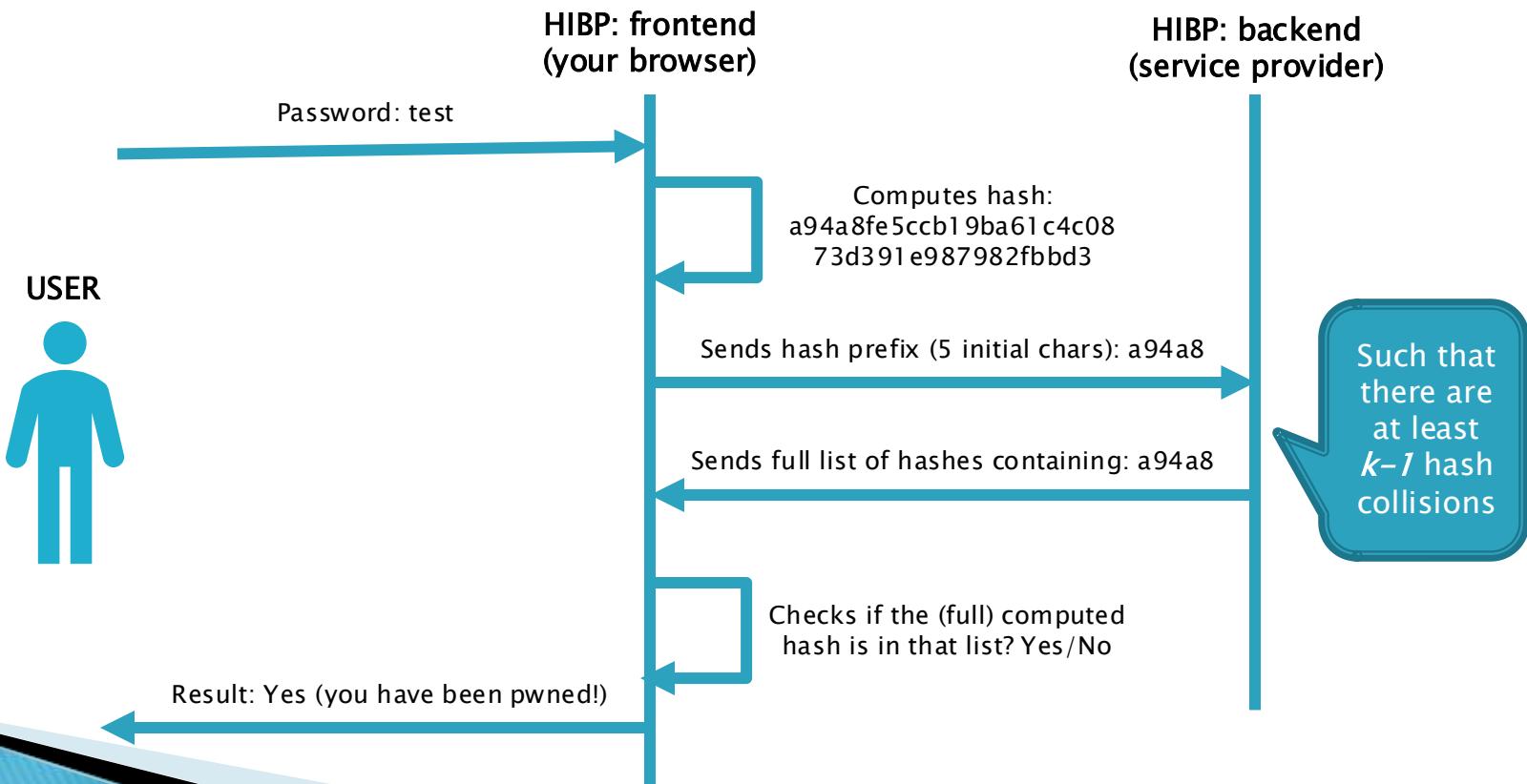
Data masking techniques (→ PETs)

- ▶ Doesn't offer a silver bullet
 - One data anonymization company, Aircloak, even acknowledges that true anonymization is extremely difficult: "as is the case with IT security, no 100% guarantee can be given, and often there is the need for a risk assessment" ([source](#))
- ▶ Gazillion Anonymization techniques:
 - Often embodied as "**Privacy Enhancing Technologies**" (PETs):
 - Soft: 3rd parties can be trusted for data processing (through compliance control and audit), example technologies: differential privacy, SSL, etc
 - Hard: 3rd parties cannot be trusted, example technologies: onion routing, secret ballot, etc
- ▶ How can one assess the robustness of an anonymization technique? According to the Art. 29 WP ([now EPDP](#)) opinion (0829/14/EN WP216) on Anonymization Techniques, the criteria include:
 1. Single out an individual from a larger group
 2. Link different records related to the same individual
 3. Infer unknown information about an individual

Source: https://ec.europa.eu/justice/article-29/documentation/opinion-recommendation/files/2014/wp216_en.pdf ([alternative](#))

PET (soft): K-anonymity (range queries)

- ▶ If at least ‘ k ’ individuals share same quasi-identifier(s) in the same data set, then no individual can be uniquely traced
- ▶ E.g., HIBP (<https://haveibeenpwned.com/Passwords>) should not know your password in order to be able to tell if it was breached



Putting it all together

Don't implement the crypto. (algorithms) yourselves

+

Use appropriate crypto. key management procedures or architecture

+

Use valid (non-obsolete) ciphers & key lengths

+

Use reputed, publicly accepted and open-source cipher implementation

+

Keep crypto. libraries up-to-date

+

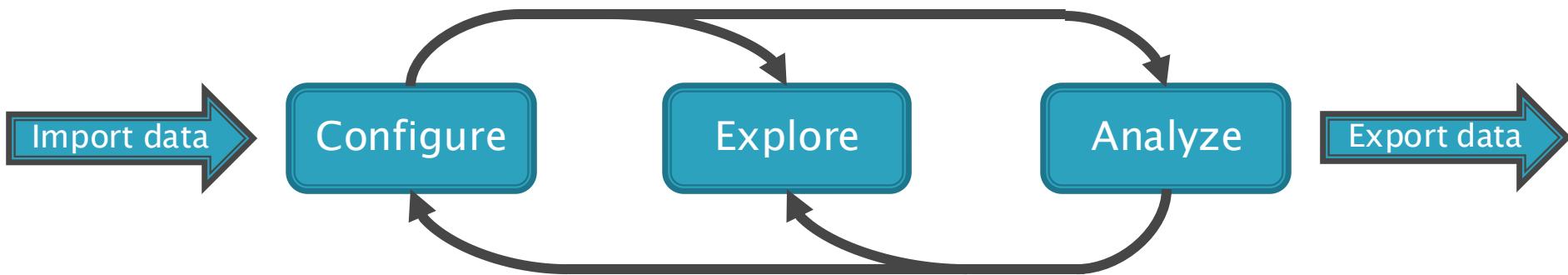
Perform testing & code review

+

Use appropriate Anonymization/pseudonymisation techniques

QUIZ...

Project: Data masking (ARX introduction)



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

Project: Data masking (ARX exercise)

▶ Use ‘Arx.deidentifier.org’

[Opensource; Apache “License” Version 2.0]

1. Download (and install) Arx:

<https://arx.deidentifier.org/downloads/>

– If you get a warning that developer is not (or cannot be) verified, please ignore it.

– For MAC users, if your device is based on ARM ISA, ARX tool will not run, as it is based on x86 ISA. Make sure Rosetta 2 is installed.



More info. -> **Run anyway**

2. Create a new project

3. Import your project dataset

4. Perform data masking (using any transformation/technique of your choice)

GOAL: Mask direct identifiers while masking quasi-identifiers to a level that ensures an acceptable level of utility percentage

5. Generate ARX certificate and (optionally) export your project OUTPUT (anonymized) file (firstname_lastname) & upload it to the ‘Teams’ assignment section (using your EPITA account)

- NOTE:

- Do Not submit compressed files (.zip, .rar, etc).
- Do Not submit sharepoint or external cloud links.

Deadline: See ‘Teams’ Assignment section

Project: Data masking (report)

Individual report:

- **Section 4:** Include your project ARX certificate
- **Section 5:** Explain the decisions taken in reference to the ARX certificate
 - **Input specifications**
 - Attributes and transformations
 - Configurations
 - **Output properties:**
 - Output data
 - Solutions
 - Transformations
 - Data quality models
 - Privacy models

NOTE: Collaborate on brainstorming as a group, but avoid copying and pasting your group members' work.

Deadline: See 'Teams' Assignment section

Lecture 2 ends here

- ▶ Course Slides: Go to MS Teams:
‘Data Privacy by Design’
→ “Files section”
- ▶ Send your questions by email OR via direct message using MS Teams
- ▶ Thank You!