

(Privacy) policy information in data value chains

Sabrina Kirrane
Vienna University of Economics and Business

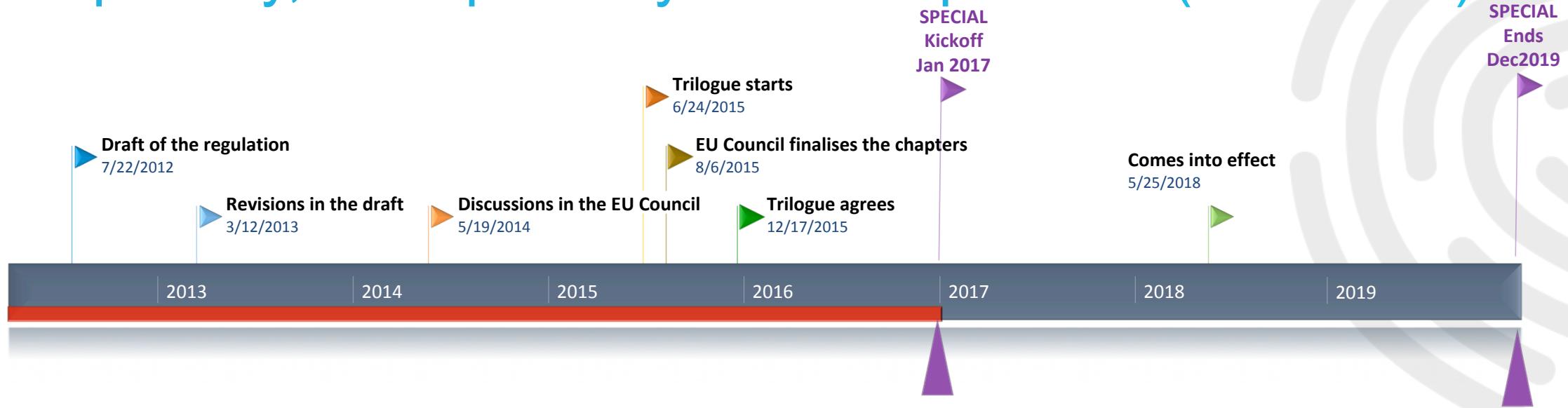


European
Commission

Horizon 2020
European Union funding
for Research & Innovation



Scalable Policy-aware Linked Data arChitecture for prlvacy, trAnsparency and compLiance (SPECIAL)



Companies whose business models rely on personal data and for which the GDPR is both a challenge and an opportunity



Data subjects who would like to declare, monitor and optionally revoke their (often not explicit) preferences on data sharing



Regulators who can leverage technical means to check compliance with the GDPR

The Big Data Ecosystem

How will the
GDPR effect my
fishing?

Data Lake



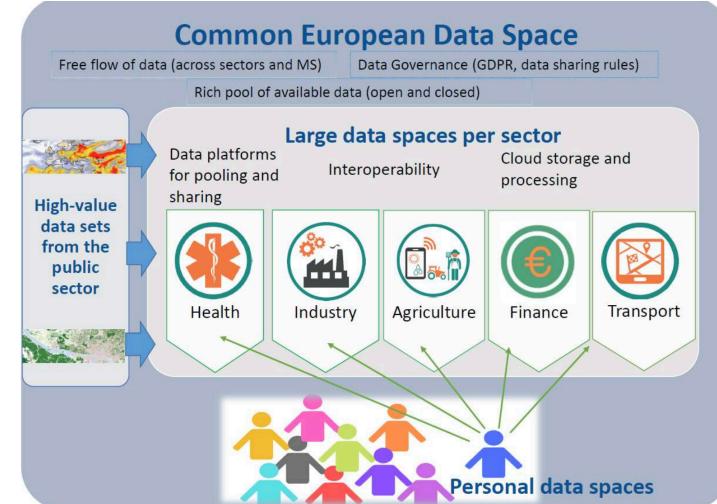
<https://solutionsreview.com/data-integration/the-emergence-of-data-lake-pros-and-cons/>

Data Market



<http://themerkle.com/slur-io/>

Data Spaces



https://www.internationaldataspaces.org/wp-content/uploads/dlm_uploads/2019/07/20190625-1500-Common-European-Industrial-IoT-by-Arian-Zwegers.pdf

Big Data & Anonymisation

4.5.2016 EN Official Journal of the European Union L 119/1

I
(Legislative acts)

REGULATIONS

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
of 27 April 2016
on the protection of natural persons with regard to the processing of personal data and on the free
movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
(Text with EEA relevance)

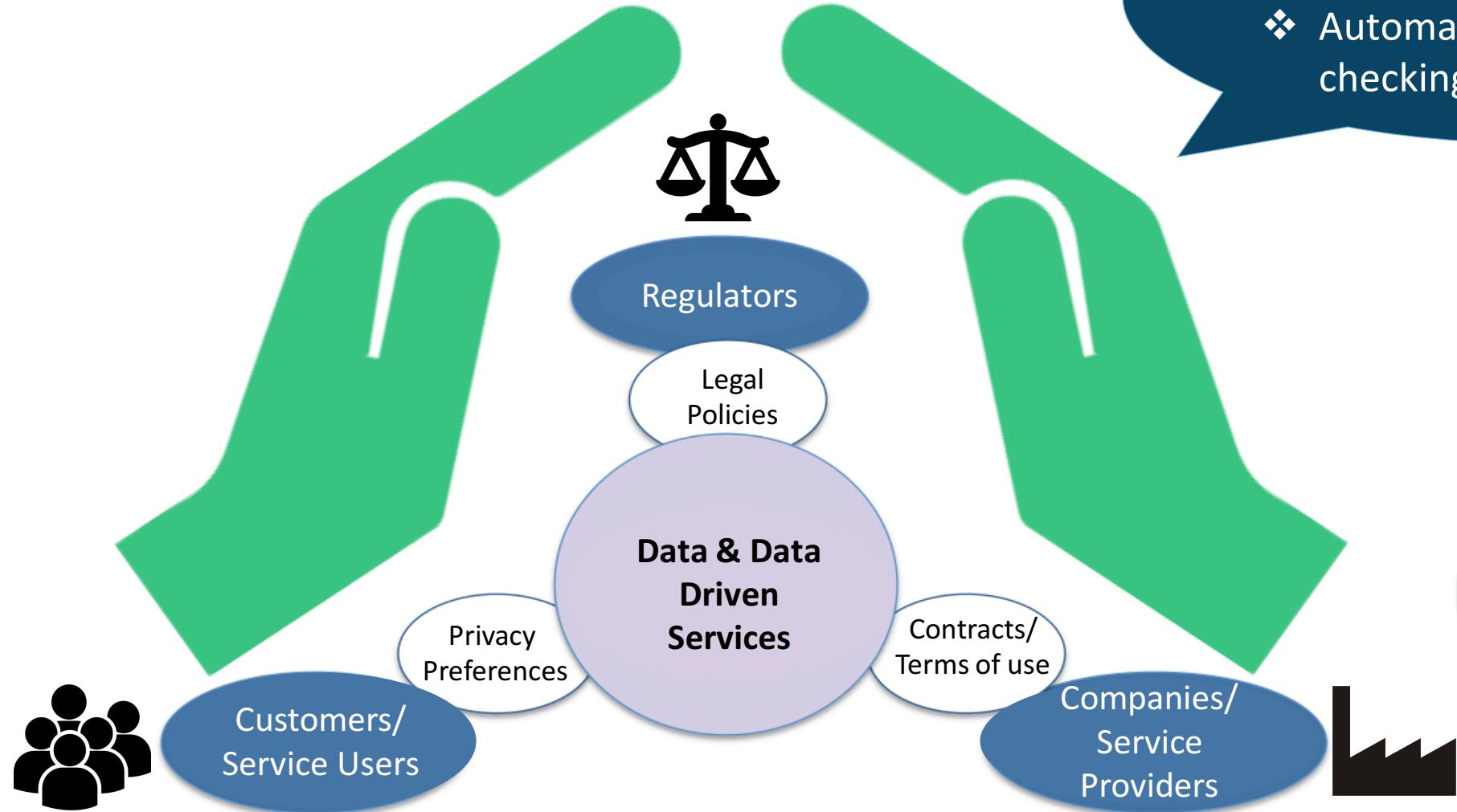
THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,
Having regard to the Treaty on the Functioning of the European Union, and in particular Article 16 thereof,
Having regard to the proposal from the European Commission,
After transmission of the draft legislative act to the national parliaments,
Having regard to the opinion of the European Economic and Social Committee (¹),
Having regard to the opinion of the Committee of the Regions (²).

Primary challenges:

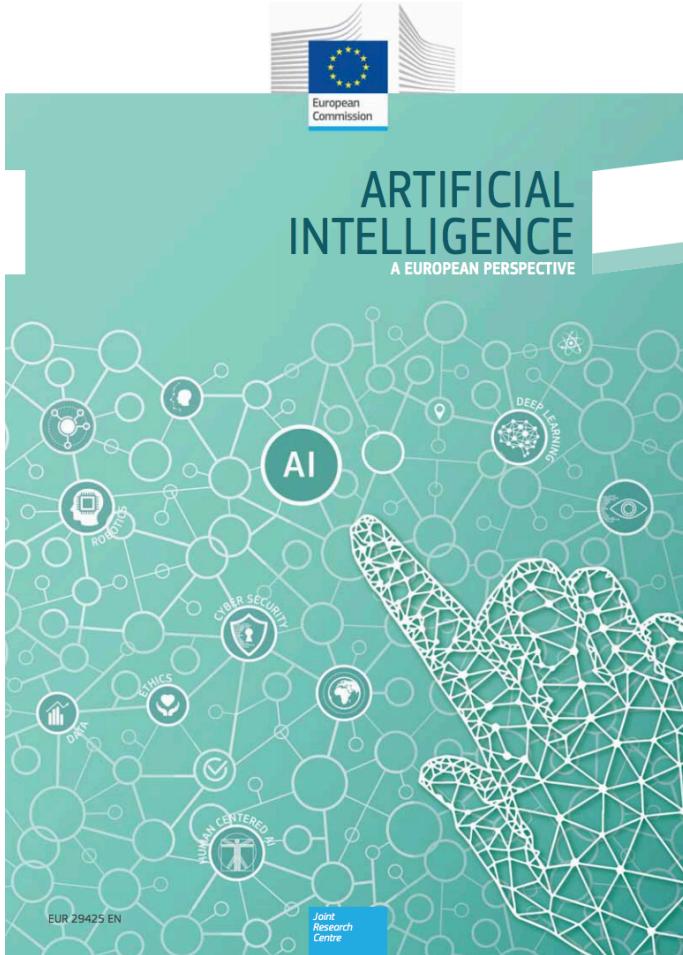
- ❖ It is hard to give guarantees with respect to anonymity
- ❖ There is a tradeoff between anonymity and utility

- (26) The principles of data protection should apply to any information concerning an identified or identifiable natural person. Personal data which have undergone pseudonymisation, which could be attributed to a natural person by the use of additional information should be considered to be information on an identifiable natural person. To determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used, such as singling out, either by the controller or by another person to identify the natural person directly or indirectly. To ascertain whether means are reasonably likely to be used to identify the natural person, account should be taken of all objective factors, such as the costs of and the amount of time required for identification, taking into consideration the available technology at the time of the processing and technological developments. The principles of data protection **should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.** This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes.

Data & Usage Constraints



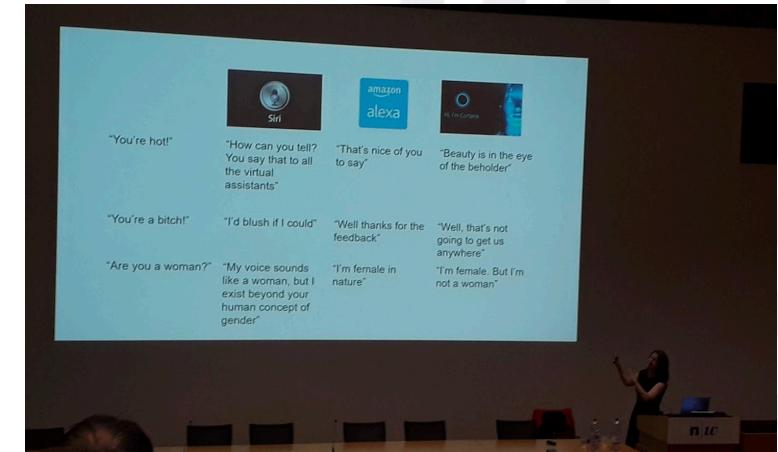
The Artificial Intelligence Ecosystem



<http://publications.jrc.ec.europa.eu/repository/bitstream/JRC113826/ai-flagship-report-online.pdf>



Apple's 1987 Knowledge Navigator
https://commons.wikimedia.org/wiki/File:Knowledge_Navigator.jpg



Nora Ni Loideain, Conversational Agents: Siri, Alexa, & Cortana <https://infolawcentre.blogs.sas.ac.uk/about/dr-nora-ni-loideain/>



Data Value Chains

SPECIAL Technical Foundations

Data & Data Driven Services

The World Wide Web



Information Management: A Proposal

Tim Berners-Lee, CERN

March 1989, May 1990

This proposal concerns the management of general information about accelerators and experiments at CERN. It discusses the problems of loss of information about complex evolving systems and derives a solution based on a distributed hypertext system.

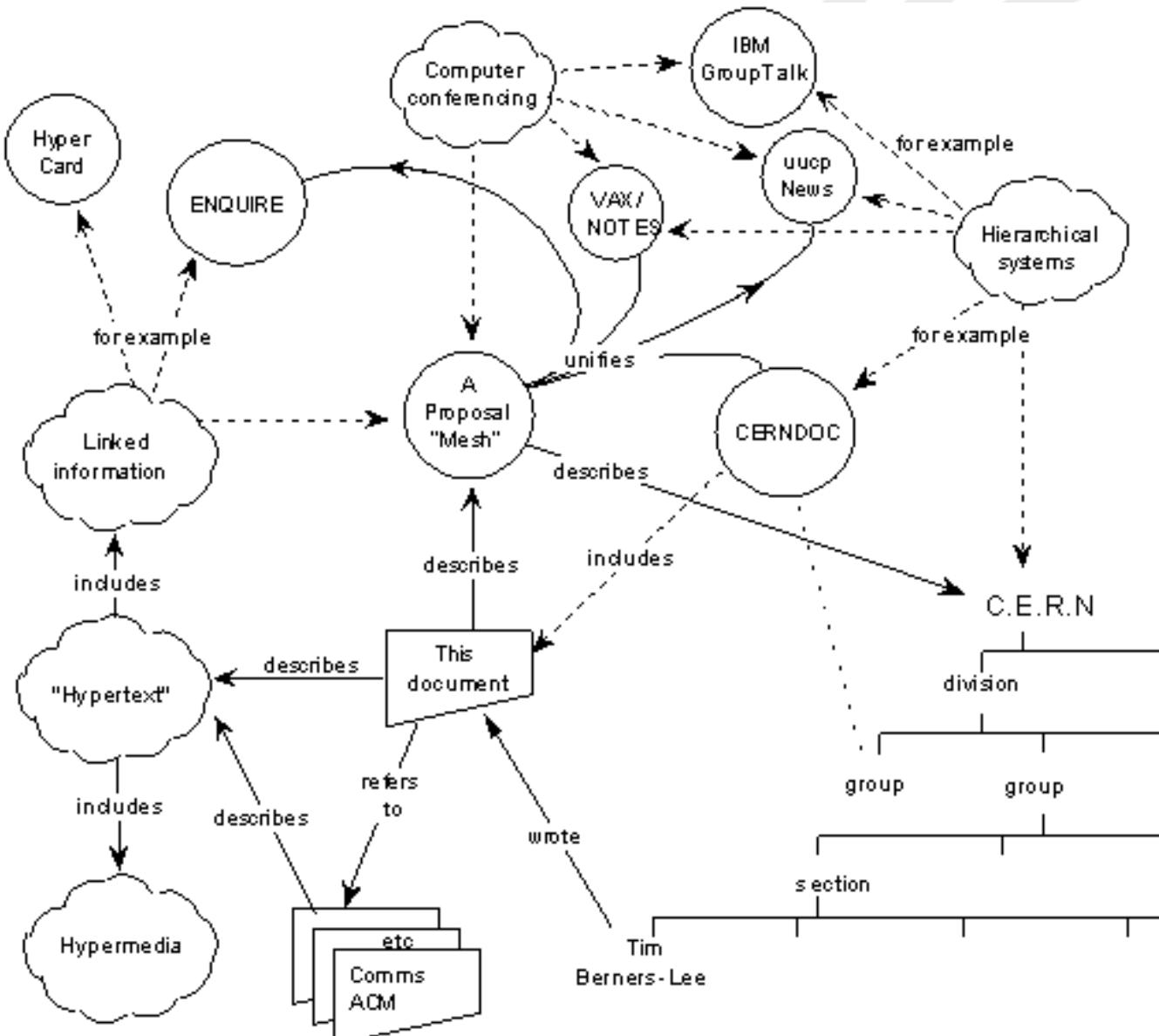
Overview

Many of the discussions of the future at CERN and the LHC era end with the question - "Yes, but how will we ever keep track of such a large project?" This proposal provides an answer to such questions. Firstly, it discusses the problem of information access at CERN. Then, it introduces the idea of linked information systems, and compares them with less flexible ways of finding information.

It then summarises my short experience with non-linear text systems known as "hypertext", describes what CERN needs from such a system, and what industry may provide. Finally, it suggests steps we should take to involve ourselves with hypertext now, so that individually and collectively we may understand what we are creating.

1989 The original proposal for the Web

<https://www.w3.org/History/1989/proposal.html>

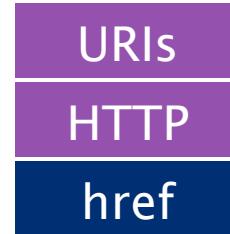


Data & Data Driven Services

How can we ensure Interoperability?



- Globally Unique identifiers
- A common protocol
- **Links between Documents**



Home



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ORCID: [0000-0002-6955-7718](#)
SCOPUS: [53979829800](#)

Technology and society are constantly evolving. Although we can't predict what the future holds we can certainly influence it!

About me

I'm a senior postdoctoral researcher at the Vienna University of Economics and Business, where I am also a member of the recently founded Research Institute for Cryptoeconomics. In addition, I am the Founding Director of the [Privacy and Sustainable Computing Lab](#), which was setup in September 2015, and the Scientific/Technical Co-ordinator of the [SPECIAL H2020 project](#), which kicked off in January 2017.

SPECIAL ABOUT PUBLICATIONS ALLIANCES RESOURCES MEMBERS

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Fact Sheet

>Last Updated: 29 August 2018

Name	Scalable Policy-aware linked data architecture for privacy, transparency and compliance
EC project N°:	731601
Call:	Information and Communication Technologies Call (H2020-ICT-2016-2017)
Funding scheme:	RIA over 3 years - 9 partners from 6 countries
Duration:	36 months from January 2017 to December 2019
Total EC Funding:	3,991,389 €

Data & Data Driven Services

The Semantic Web & Intelligent Agents

W3C®

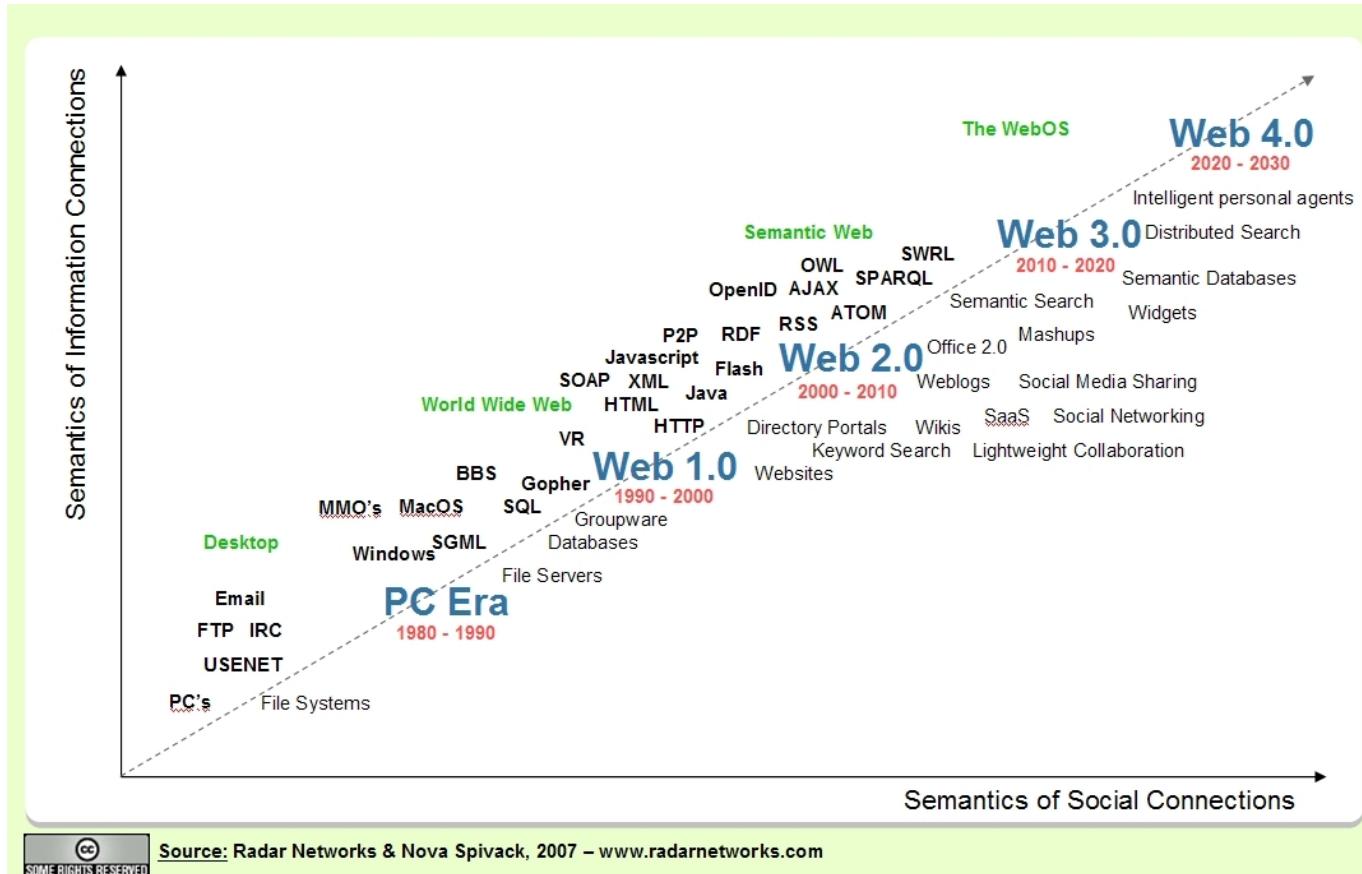


Image by Radar Networks; Nova Spivak
<http://memebox.com/futureblogger/show/824>

2001 The Semantic Web
<https://www.scientificamerican.com>

Data & Data Driven Services

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- Globally Unique identifiers
- A common protocol
- **Typed Links between Entities**



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foaf: workplaceHomepage

<https://www.wu.ac.at/en/Infobiz/>

Home



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FOAF Vocabulary Specification 0.99

Namespace Document 14 January 2014 - Paddington Edition

This version: <http://xmnlis.com/foaf/spec/20140114.html> (rdf)
Latest version: <http://xmnlis.com/foaf/spec/> (rdf)
Previous version: <http://xmnlis.com/foaf/spec/20100809.html> (rdf)
Authors: Dan Brickley, Libby Miller
Contributors: Members of the FOAF mailing list (foaf-dev@lists.foaf-project.org) and the wider RDF and Semantic Web developer community. See acknowledgements.
Copyright © 2000-2014 Dan Brickley and Libby Miller

This work is licensed under a [Creative Commons Attribution License](#). This copyright applies to the FOAF Vocabulary Specification and accompanying documentation in RDF. Regarding underlying technology, FOAF uses W3C's [RDF](#) technology, an open Web standard that can be freely used by anyone.

Abstract

This specification describes the FOAF language, defined as a dictionary of named properties and classes using W3C's RDF technology.



Institute for Information Business



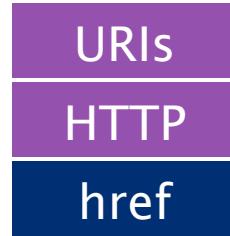
Institute for Information Business

Data & Data Driven Services

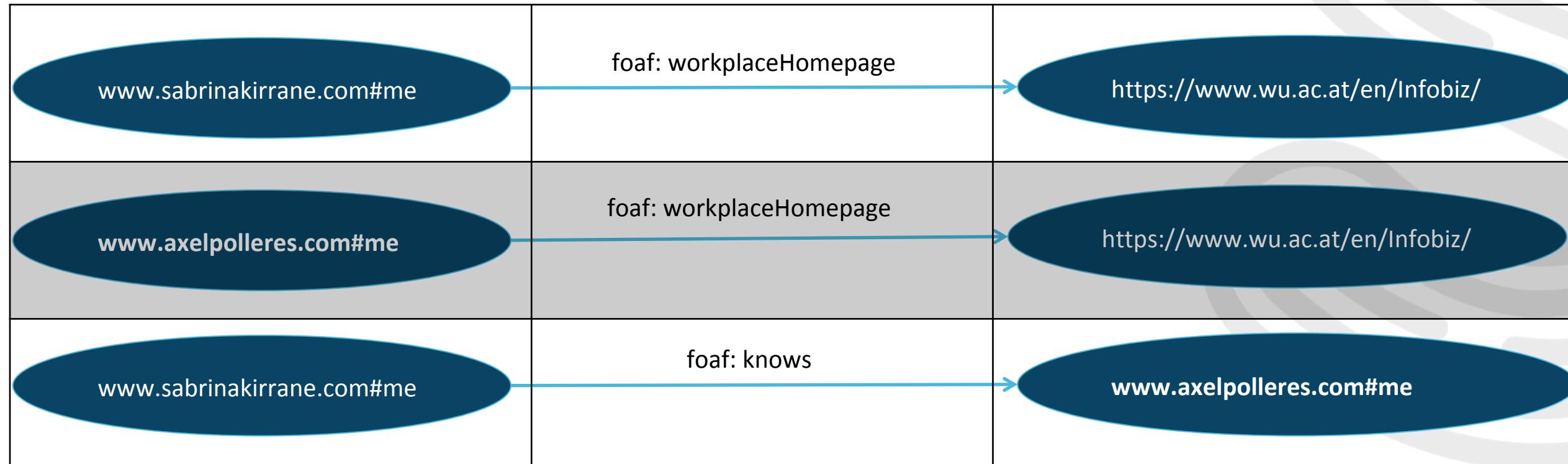
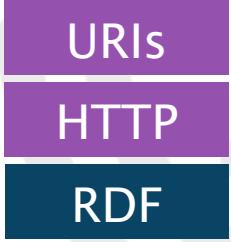
How can we ensure Interoperability?



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- Globally Unique identifiers
- A common protocol
- **Typed Links between Entities**

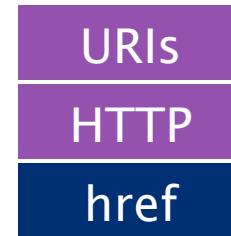


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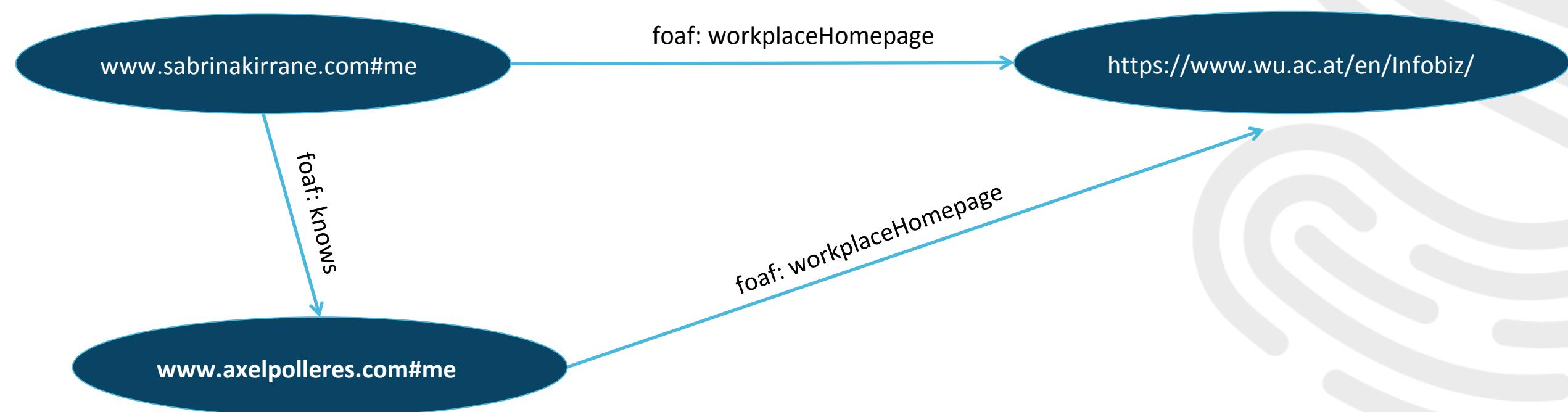
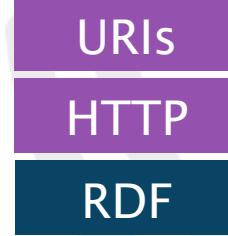
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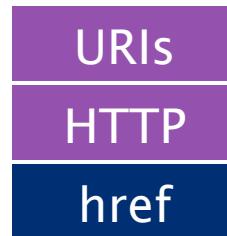


Data & Data Driven Services

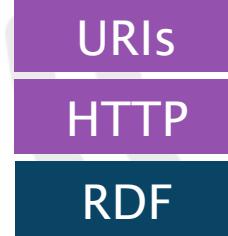
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foaf: workplaceHomepage

https://www.wu.ac.at/en/Infobiz/

- Common data model for encoding data (**triples**)
- Common ways of serialising data (**syntaxes**) ++
- Well-defined languages for saying what terms mean (**semantics**)
- Common ways to query data (**query languages**)

www.axelpolleres.com#me

foaf: workplaceHomepage

Data & Data Driven Services

Distributed Data Sources



The European Data Portal homepage features a search bar with "Search site content..." and a magnifying glass icon. Below it is a map of Europe with national flags. The main menu includes "What we do", "Data", "Providing Data", "Using Data", and "Resources". A sidebar on the left offers "Search Datasets" with a keyword search input and a "SPARQL Search" button, and "Browse Datasets by Categories" with icons for Agriculture, Fisheries, Forestry & Foods; Energy; Transport; Economy & Finance; Government & Public Sector; and Justice, Legal System & Public Safety.

<https://www.europeandataportal.eu/en/homepage>

Newsletter | FAQ | Search | Contact | Cookies | Legal notice English (en) ▾

Search site content...

❖ When it comes to datasets this is just the tip of the iceberg....

European Data Portal > Home

What we do ▾ Data ▾ Providing Data ▾ Using Data ▾ Resources ▾

Search with SPARQL-Query

Search for metadata in the European Data Portal triple store using SPARQL queries.

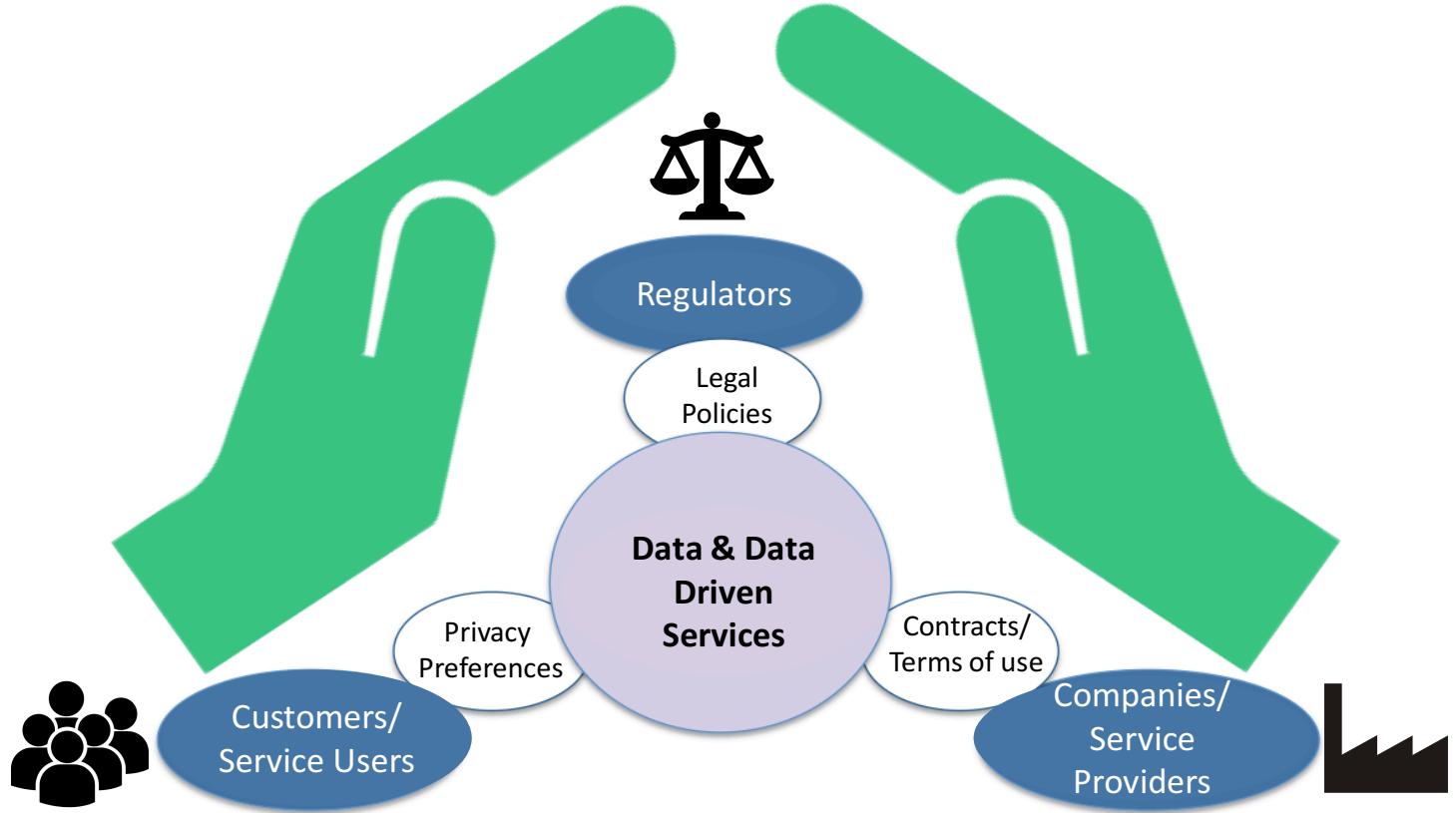
The SPARQL manager sends user defined SPARQL queries to the Virtuoso SPARQL query engine.

SPARQL specifications can be found on the [W3C web site](#). Please note that this is a tool for SPARQL experts.

Prefixes

```
1 SELECT (count(*) AS ?count) WHERE { ?s a dcat:Dataset } } LIMIT 100
```

Please note that this is a tool for SPARQL experts.



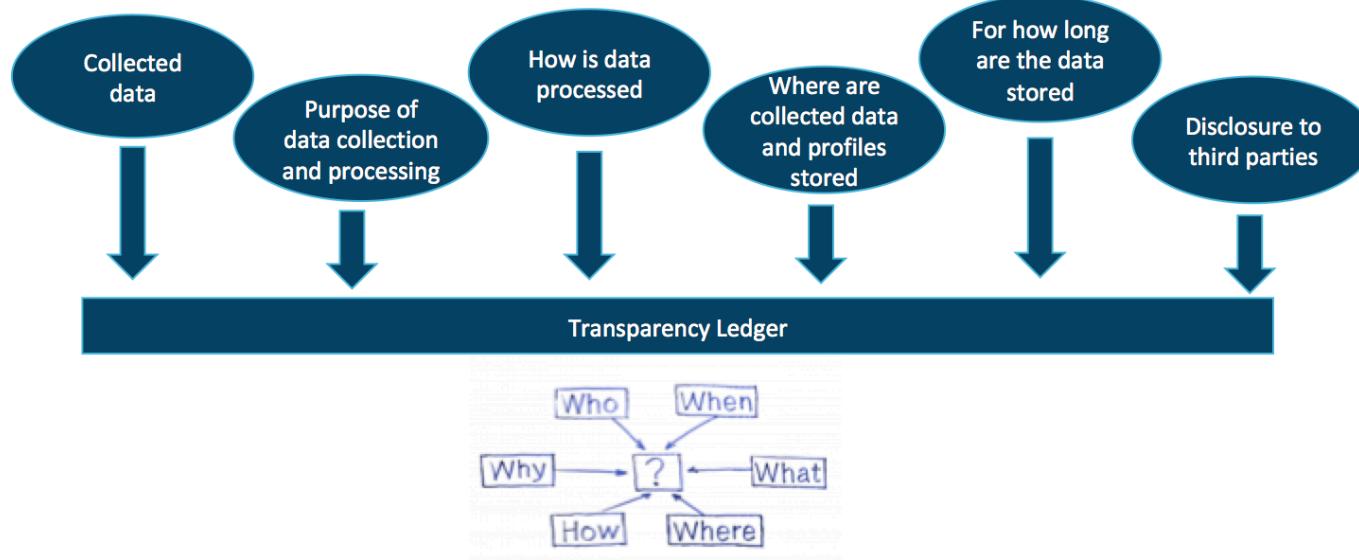
Data & Data Driven Services



Privacy Preferences

Privacy Preferences

How can we ensure Interoperability?



- Available for download via the SPECIAL website: <https://www.specialprivacy.eu/publications/public-deliverables>
- An unofficial draft specification has been published online <https://www.specialprivacy.eu/platform/ontologies-and-vocabularies>

The SPECIAL Usage Policy Language

version 0.1



Unofficial Draft 06 April 2018

Editor:

Javier D. Fernández (Vienna University of Economics and Business)

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Luigi Sauro (Università di Napoli Federico II)

Eva Schleehahn (Unabhängiges Landeszentrum für Datenschutz (ULD))

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Abstract

This document specifies usage policy language of SPECIAL. The usage policy language is meant to express both the data subjects' consent and the data usage policies of data controllers in formal terms, understandable by a computer, so as to automatically verify that the usage of personal data complies with data subjects' consent.

The ontology defined in this document is publicly available at <http://www.specialprivacy.eu/langs/usage-policy>.

The SPECIAL Policy Log Vocabulary

A vocabulary for privacy-aware logs, transparency and compliance - version 0.3



Unofficial Draft 06 April 2018

Editor:

Javier D. Fernández (Vienna University of Economics and Business)

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Uros Milosevic (Tenforce)

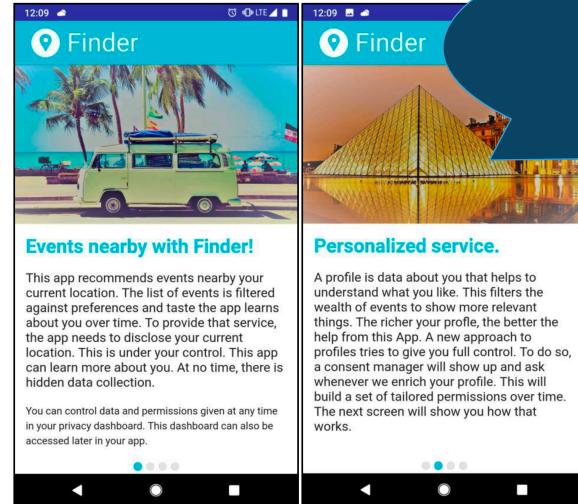
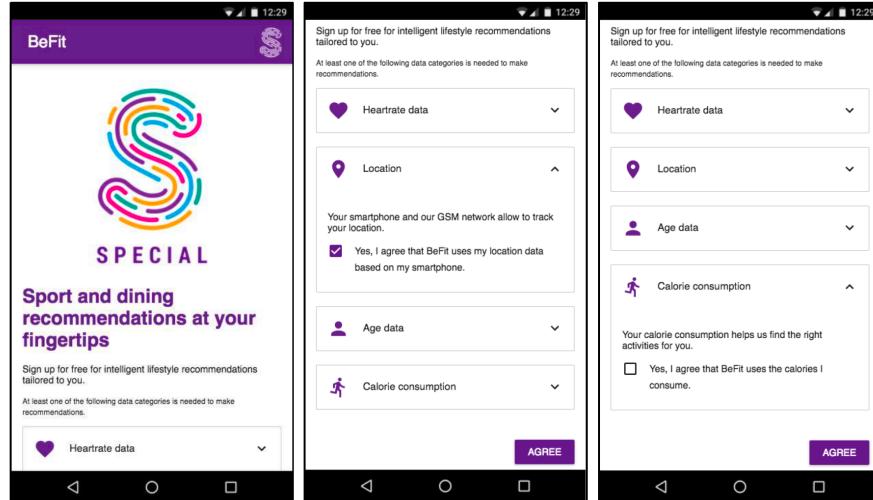
Axel Polleres (Vienna University of Economics and Business)

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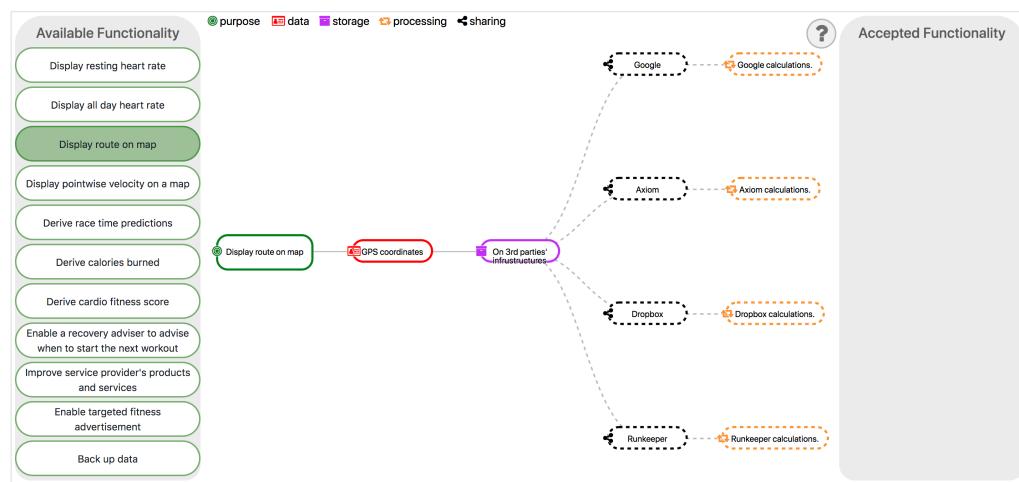
Abstract

This documents specifies *slog*, a vocabulary to log data processing and sharing events that should comply with a given consent provided by a data subject. We also model the consent actions related to consent giving and revocation

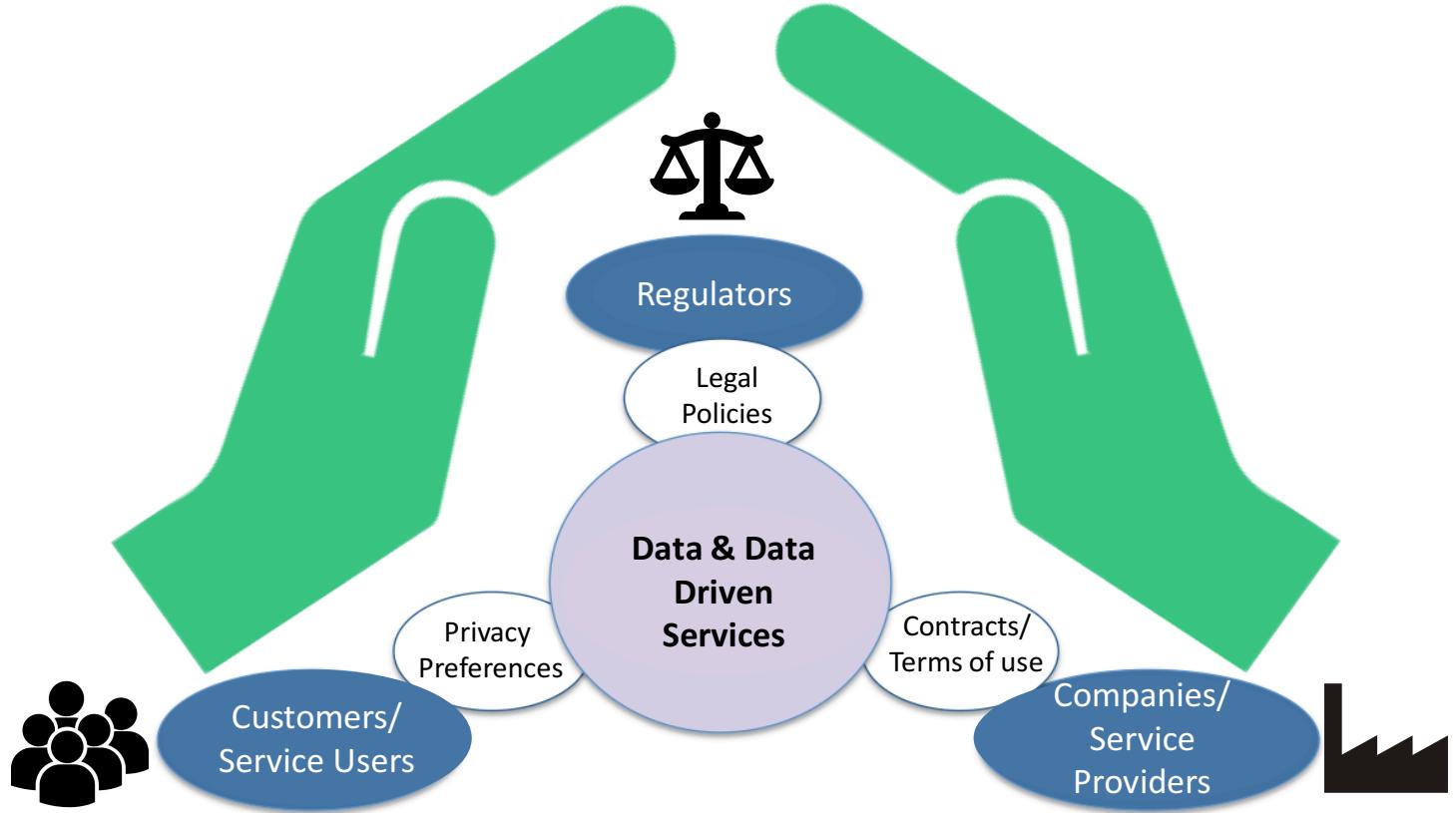
Privacy Preferences Challenge: Human Computer Interaction



❖ We need to make it easy for individuals to manage their personal data



Data category	%
Activity data	24.43%
Audiovisual activity data	24.43%
Computer data	21.37%
Content data	17.56%
Anonymized data	12.21%



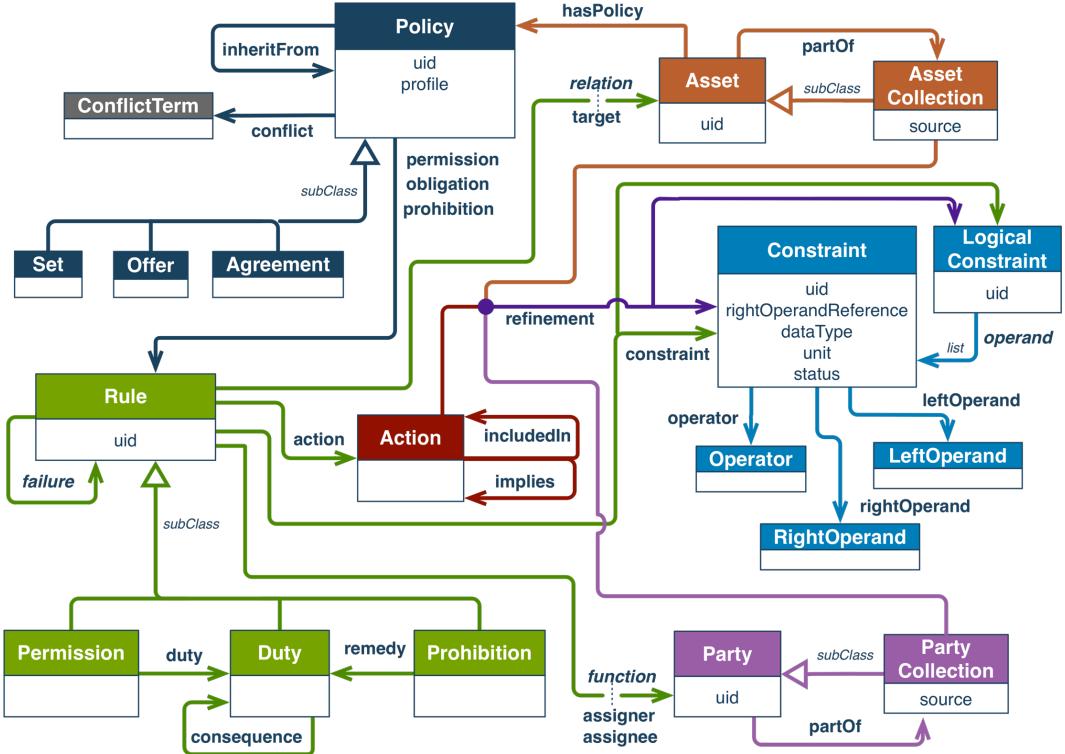
Data & Data Driven Services



Terms of Use

Contracts & Terms of Use

How can we ensure Interoperability?



- Modeling licenses using the Open Digital Rights Language
- Dependency modeling
- Conflict detection & Resolution



ODRL Information Model 2.2

W3C Recommendation 15 February 2018

This version:

<https://www.w3.org/TR/2018/REC-odrl-model-20180215/>

Latest published version:

<https://www.w3.org/TR/odrl-model/>

Latest editor's draft:

<https://w3c.github.io/poe/model/>

Implementation report:

<https://w3c.github.io/poe/test/implementors>

Previous version:

<https://www.w3.org/TR/2018/PR-odrl-model-20180104/>

Contracts & Terms of Use Challenge: Compliance



- ❖ There are many resources without any terms of us
 - ❖ We need compliance tools

This screenshot shows a search interface for a large dataset of events. The top navigation bar includes 'All' (selected), 'Images', 'Videos', 'Books', 'News', 'More', 'Settings', and 'Tools'. Below the navigation are filters: 'Size', 'Color' (set to 'Labeled for reuse'), 'Type' (set to 'Clear'), and 'Time'. A circular icon at the top left indicates the total number of results: 1,678,900.

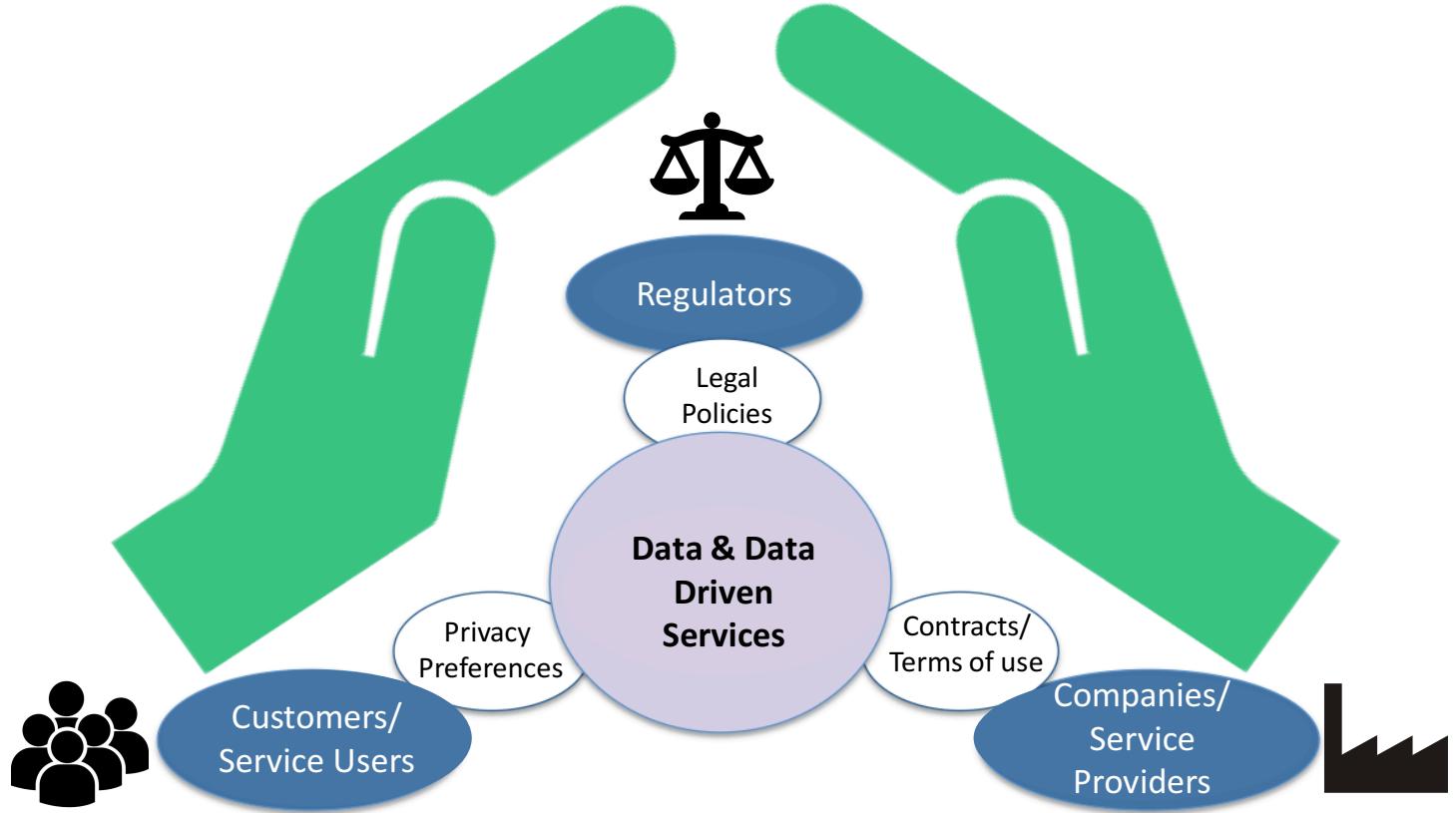
The main content area displays a grid of event cards. Each card contains a small thumbnail image, the event name, and a detailed description table. The columns in these tables include:

- FUNCTIONS**: A pyramid diagram showing levels from I (Self-protective) to VI (Self-adaptation).
- ATTRIBUTES**: A row of icons representing various event types: counterflow, bridge, population, killed, specific trigger, crowd management failure, and escape panic.
- Smart City Projects**: A section showing projects like New York, San Francisco, Austin, Washington DC, and Montgomery County.

The data table for each event includes the following columns:

event	year	dead	injur-ed	crowd size	event type	mod type num	relig.	indoor	counterflow	bridge	popula-tion	popula-tion killed	specific trigger	crowd mgmt failure	escape panic	Event name	src	cat	stam	geo	geo-nu	non-white	country	WP title	Title word					
5	1876	276		1,000	F	1	0	Y	N	N	A	A	Y		Y	Brooklyn Theatre fire	wp	fire	0	A	0	0	USA	0	line					
7	1883	163		1,100	T	8	0	0	Y	N	C	C	Y		Y	Victoria Hall disaster	wp	crush	0	A	0	0	England	0	disaster					
8	1892	125	1300	500,000	P	3	0	0	Y	N	G	G	Y		Y	Knickerbocker tragedy	wp	panic	0	A	0	0	USA	0	tragedy					
9	1902	115	6,000	R	S	5	1	Y	N	N	A	G	Y		Y	St. Louis Cardinals disaster	wp	crush	0	A	0	1	USA	0	disaster					
10	1903	602	2,250	F	1	1	0	Y	N	N	N	G	Y		Y	Brooklyn Theatre fire	wp	fire	0	A	0	0	USA	0	line					
11	1908	16	40	400	T	8	0	0	Y	N	C	C	Y		Y	Banbury Public Hall stampede	wp	stamp	1	A	0	0	England	0	disaster					
12	1913	73	40	400	T	8	0	0	Y	N	N	G	Y		Y	Italian Hall disaster	wp	crushP	0	A	0	0	USA	0	disaster					
13	1914	33	400	85,000	S	7	0	0	N	N	G	G	N	Y		Y	Buendon Park disaster	wp	crushP	0	A	0	0	England	0	disaster				
14	1954	800	2000	5,000,000	R	S	5	1	N	N	N	G	G	N	Y		Y	1954 Kumbha Mela stampede	wp	stamp	1	B	1	1	India	1	stamp			
15	1756	328	53,000	1,000	F	7	0	0	N	N	G	G	Y	Y	Y	Y	Endeavour National disaster	wp	crush	0	B	1	1	Peru	0	disaster				
16	1878	66	200	85,000	S	7	0	0	N	N	G	G	N	Y	Y	Y	1878 London Zoo disaster	wp	crush	0	A	0	0	England	0	disaster				
17	1973	11	26	14,770	M	2	0	0	N	N	N	G	Y		Y	Y	1973 The Kohinoor diamond disaster	wp	crush	0	A	0	0	USA	0	disaster				
18	1975	65	61	16,643	S	7	0	0	N	N	N	G	C	N	Y	Y	Ludwigsburg disaster	wp	crush	0	A	0	0	Russia	0	disaster				
19	1985	39	600	53,000	S	7	0	0	N	N	N	G	Y	Y	Y	Y	Hercules Stadium disaster	wp	crush	0	A	0	0	Belgium	0	disaster				
20	1988	93	100	16,643	S	7	0	0	N	N	G	G	N	Y	Y	Y	Hilleshogbydisaster	wp	crush	0	B	1	1	Nepal	0	disaster				
21	1990	40	30,000	16,643	R	S	5	1	N	N	N	G	Y	Y	Y	Y	1990 Mexico tunnel tragedy	wp	crush	0	A	0	0	England	0	disaster				
22	1991	40	30,000	16,643	R	S	5	1	N	N	N	A	N	Y	Y	Y	Y	Dirkse Stadium Disaster	wp	crush	0	B	1	1	Saudi Arabia	1	stamp			
23	1991	40	30,000	16,643	R	S	5	1	N	N	N	N	Y	Y	Y	Y	Y	The Camp Nou Rail Crash	wp	crush	0	A	0	0	USA	0	crash			
24	1991	73	77,745	53,000	S	7	0	0	N	N	G	G	Y	Y	Y	Y	Y	1991 Kumbha Mela stampede	wp	stamp	1	B	1	1	India	1	stamp			
25	1991	73	77,745	53,000	F	S	7	0	N	N	N	N	A	N	Y	Y	Y	Y	1991 October 16 disaster	wp	crush	0	B	1	1	South Africa	0	disaster		
26	1993	21	50	50,000	PO	4	4	0	N	N	G	WC	Y	Y	Y	Y	Y	1993 Sabarmati stampede	wp	stamp	1	B	1	1	India	1	stamp			
27	1996	83	147	50,000	S	7	0	0	N	N	G	G	N	Y	Y	Y	Y	Y	1996 Sabarmati stampede	wp	stamp	1	A	0	0	Bolivia	0	disaster		
28	1999	53	100	M	2	2	0	N	N	N	N	N	Y	Y	Y	Y	Y	Y	2000 Bodøgata Festival 2000 incident	wp	crush	0	A	0	0	Denmark	0	incident		
29	2000	9	21	77,745	M	2	2	0	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Elli Park Stadium disaster	wp	crush	0	B	1	1	South Africa	0	disaster	
30	2001	43	120,000	S	7	0	0	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	Alcoca Sports Stadium disaster	wp	crush	0	B	1	1	Ghana	0	disaster	
31	2001	127	162	162	P	3	3	0	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	Accra Sports Stadium disaster	wp	crush	0	B	1	1	Japan	0	accident	
32	2001	21	247	162	R	S	5	1	N	N	N	N	C	N	Y	Y	Y	Y	Y	Almada crowd crush	wp	crush	0	B	1	1	USA	0	accident	
33	2002	21	50	1,500	M	2	2	0	Y	N	A	A	Y	Y	Y	Y	Y	Y	2002 El Riaz stampede	wp	stamp	1	A	0	0	USA	0	fire		
34	2003	100	230	462	F	1	1	0	Y	N	M	A	A	Y	Y	Y	Y	Y	Y	2003 Sri Srinivasa Temple stampede	wp	crush	0	A	0	0	USA	0	disaster	
35	2005	231	300,000	1,000,000	F	1	1	1	N	N	Y	WC	N	Y	Y	Y	Y	Y	Y	2005 Hindu Chettikulam temple stampede	wp	stamp	1	B	1	1	India	1	stamp	
36	2006	345	283	1,230,593	R	S	5	1	N	N	N	N	A	A	N	Y	Y	Y	Y	2005 Al-Azhar bridge stampede	wp	stamp	1	B	1	1	Iraq	1	stamp	
37	2006	73	400	30,000	S	7	0	0	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	Haj 2006	wp	ak	0	B	1	1	Saudi Arabia	1	stamp	
38	2006	162	47	3,000	R	S	5	1	N	N	N	G	Y	Y	Y	Y	Y	Y	Y	Philippines Stadium stampede	wp	stamp	1	B	1	1	Philippines	1	stamp	
39	2006	162	47	3,000	R	S	5	1	N	N	N	M	A	Y	Y	Y	Y	Y	Y	Naina Devi stampede	wp	stamp	1	B	1	1	India	1	stamp	
40	2006	224	425	25,000	R	S	5	1	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	2006 Jodhpur stampede	wp	stamp	1	B	1	1	India	1	stamp	
41	2006	29	38,000	38,000	S	7	0	0	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	2006 Jawaharlal Nehru Stadium stampede	wp	stamp	1	B	1	1	India	1	stamp	
42	2010	21	500	2,000,000	M	2	2	0	N	N	G	G	Y	Y	Y	Y	Y	Y	Y	2010 Jawaharlal Nehru Stadium stampede	wp	stamp	1	B	1	1	India	1	stamp	
43	2010	347	75,400,000	P	3	3	1	M	N	Y	G	G	N	Y	Y	Y	Y	Y	Y	2010 Shaanxi Beach stampede	wp	stamp	1	B	1	1	China	1	stamp	
44	2010	102	100	R	S	5	1	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	2010 Nizamia stampede	wp	stamp	1	B	1	1	India	1	stamp	
45	2013	60	200	50,000	P	3	3	0	N	N	Y	N	WC	Y	Y	Y	Y	Y	Y	2013 Hougang United-Bogor stampede	wp	stamp	1	B	1	1	Indonesia	1	stamp	
46	2013	242	168	1,500	F	1	1	0	Y	N	N	A	A	Y	Y	Y	Y	Y	Y	Kira Ngapuh stampede	wp	fire	0	B	1	1	Brazil	0	line	
47	2013	36	39	R	S	5	1	Y	N	Y	G	G	Y	Y	Y	Y	Y	Y	Y	2013 Kumbha Mela stampede	wp	stamp	1	B	1	1	India	1	stamp	
48	2013	115	110	500,000	R	S	5	1	N	N	Y	WC	Y	Y	Y	Y	Y	Y	Y	2013 Madhuba/Rajesh stampede	wp	stamp	1	B	1	1	India	1	stamp	
49	2014	201	32	26	M	2	2	0	N	N	N	N	N	Y	Y	Y	Y	Y	Y	2014 Patna stampede	wp	stamp	1	B	1	1	India	1	stamp	
50	2014	11	40	30,000	R	S	5	1	M	N	N	G	N	Y	Y	Y	Y	Y	Y	2014 Patna stampede	wp	stamp	1	B	1	1	India	1	stamp	
51	2014	36	43	300,000	P	3	3	0	N	Y	N	G	N	Y	Y	Y	Y	Y	Y	2014 Shandong stampede	wp	stamp	0	B	1	1	China	1	stamp	
52	2015	28	5,000	S	7	0	0	N	N	N	N	G	G	Y	Y	Y	Y	Y	Y	2014 Jinju Stadium stampede	wp	stamp	1	B	1	1	Egypt	1	stamp	
53	2015	18	78	P	3	3	0	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	2015 Hajj stampede	wp	stamp	1	B	1	1	Hajj	1	stamp	
54	2015	1554	934	2,000,000	R	S	5	1	N	Y	N	A	A	N	Y	Y	Y	Y	Y	Y	2015 Ningxia stampede	wp	stamp	1	B	1	1	Saudi Arabia	1	stamp

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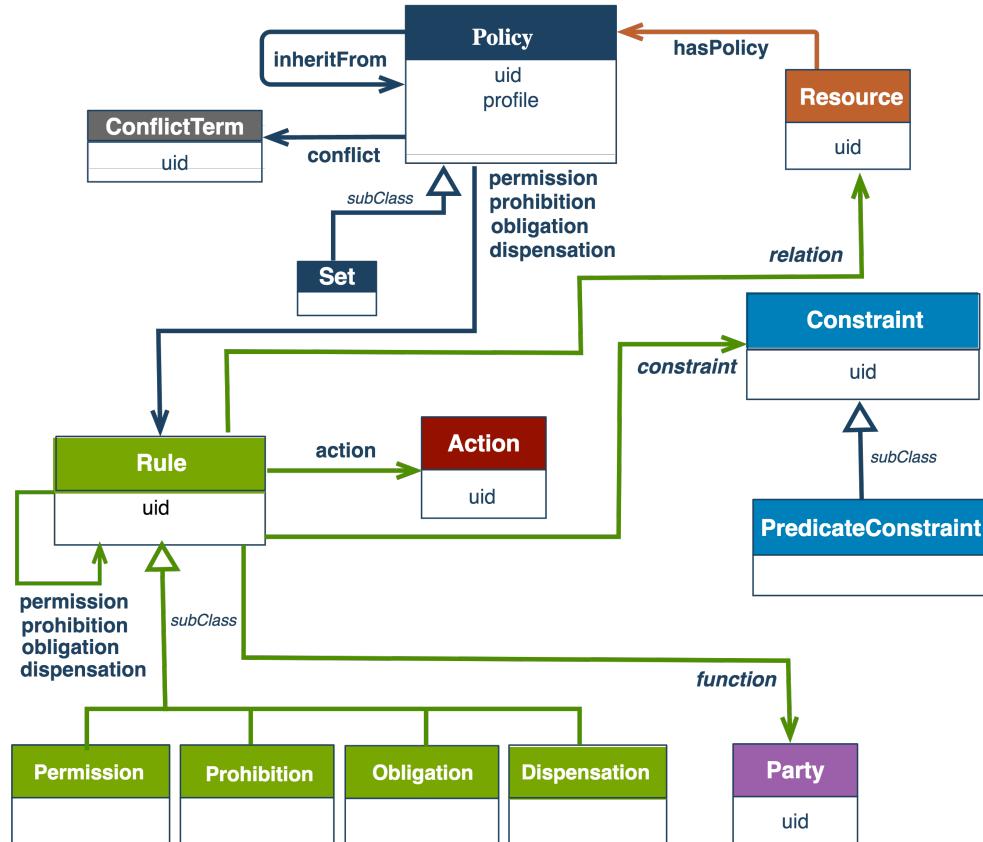
Data & Data Driven Services



Legal Policies

Legal Policies

How can we ensure Interoperability?



- Modeling regulatory obligations using an adaption of the Open Digital Rights Language
- Automated compliance checking for business policies

Draft Specification

ODRL Regulatory Compliance Profile

version 0.1

Unofficial Draft 29 May 2019

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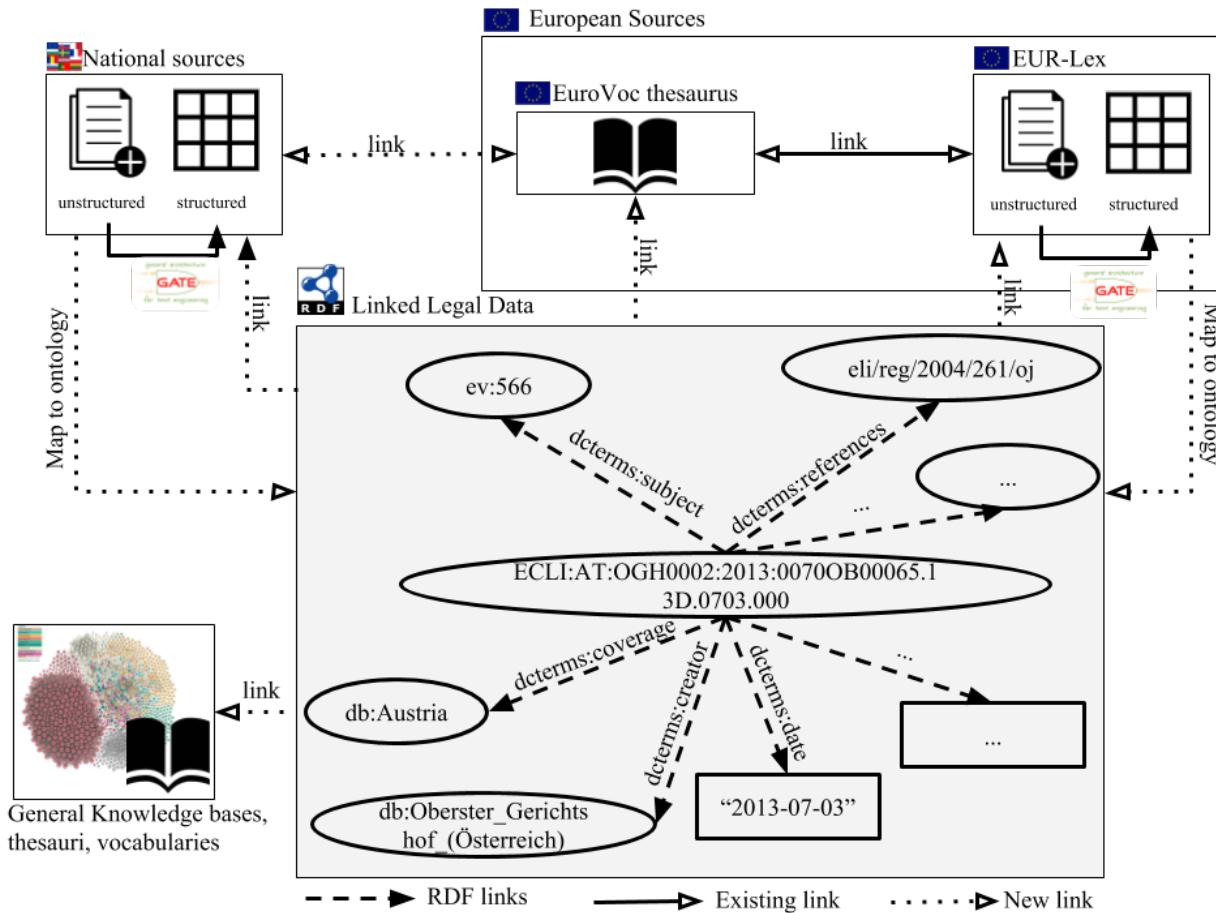
Abstract

The Open Digital Rights Language (ODRL) is a policy expression language that provides a flexible and interoperable information model, vocabulary, and encoding mechanisms for representing statements about the usage of content and services.

This document constitutes an ODRL profile that adapts the ODRL Core Model and Vocabulary with concepts and terms to support regulatory compliance checking of business policies.

In essence, ODRL Regulatory Compliance Profile policies are used to represent regulatory permissions, prohibitions, obligations, and dispensations, which may be limited by constraints (e.g., temporal, spatial).

Legal Policies Challenge: Cross Jurisdiction



- ❖ Multilingual Cross Jurisdiction
- ❖ Compliance Tools

- Extracting temporal and event data from legal text
- Modeling metadata relating to legislation and cases in a legal knowledge graph

Legal Knowledge Graph
Version 0.1

Data & Data Driven Services

Challenges & Opportunities



Data Value Chains

Challenges & Opportunities

- **Standardisation** of vocabularies (e.g., privacy, legal, licensing) is difficult
- Privacy is only the tip of the iceberg, from a usage control perspective we also need to consider other **regulations, licenses, social norms, cultural differences**
- There are **cognitive limitations** in terms of understanding how data is /will be used
- Ensuring such systems are **comply with usage constraints** is a crucial to success (i.e., all usage policies are adhered to and the system as a whole works as expected)
- We need to embrace **distributed and decentralised systems**, which complicates things further

Thank you / contact details



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