

Privileged and Confidential

Hi Mike,

Following up on your question about whether the GitHub User IDs used by Widgets Co. in the API are personal identifiers under the GDPR:

- What you describe is an “indirect identifier” and it appears that it could be used to identify an individual.
- As such, there is an obligation to delete the data on request from the user.

The GitHub user IDs used by the API can't, as you explained, be directly tied to any PII of any user within Widgets systems, but if combined with non-publicly available data on GitHub, the user could be identified. These appear to be “indirect identifiers” [as explained by the UK ICO](#).

Some key points: the ability to track a particular individual that is singled out in some way means that a piece of info is PII. This guidance is on point for our situation:

"If there is only a very slight possibility that an individual could be indirectly identified, is it still personal data? Sometimes it is not immediately obvious whether an individual can be identified or not, for example, when someone holds information where the names and other identifiers have been removed or where you process a 'non-obvious' identifier. In these cases, Recital 26 of the GDPR states that, to determine whether or not the individual is identifiable you should take into account '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'. Therefore, the fact that there is a very slight hypothetical possibility that someone might be able to reconstruct the data in such a way that the individual is identified is not necessarily sufficient to make the individual identifiable. You must consider all the factors at stake."

Also relevant is this section:

"The key point of indirect identifiability is when information is combined with other information that then distinguishes and allows for the identification of an individual."

That guidance directly addresses our case, where you can't ID the individual from within Widgets systems, but combined with Github's data, you could find the identity of the user. Given all these, they need to be treated like other forms of PII.

Let me know if I can answer any other questions around the user IDs or if I can assist with anything else.

Thanks,
Wendy