



# Privacy and Compliance -Striking a Delicate Balance

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# Abstract - Privacy and Compliance - Striking a Delicate Balance

- In the realm of public blockchains and payment systems, the need for privacy and regulatory compliance often presents a challenging dilemma. This technical talk, aims to explore the possibilities of integrating privacy measures while ensuring compliance with relevant regulations. The session will provide insights into the tools and **cryptographic protocols** that can enable policy makers to strike a delicate balance between privacy and compliance.
- To address these challenges, the session will introduce various cryptographic protocols and technological building blocks specifically tailored for privacy in payment systems. Concepts such as zero-knowledge proofs, secure multiparty computation, and confidential transactions will be explored, showcasing their potential to preserve privacy while ensuring compliance with anti-money laundering (AML) and know your customer (KYC) regulations.
- The talk will also discuss the role of decentralized technologies, such as blockchain and distributed ledger systems, in enhancing privacy and compliance in payment systems. It will highlight the benefits and limitations of these technologies, along with practical considerations for their implementation.
- Attendees will gain a comprehensive understanding of the technical tools and strategies available to design privacy-preserving payment systems that comply with regulatory requirements. They will be equipped with the knowledge to navigate the complexities of privacy-enhancing technologies and make informed decisions when developing or evaluating payment systems.









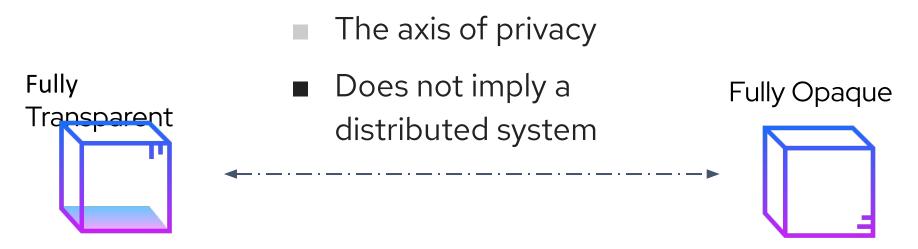
- A DB (Encrypted at rest)
- Unshielded public blockchain (Bitcoin, Eth..)





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- Monero
- Zerocash/Zcash
- CT/MimbleWimble



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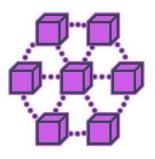
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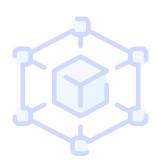
Three types of systems

Public blockchain







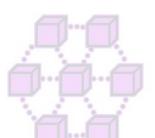




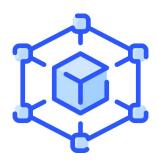


Three types of systems

Public blockchain



Payment service







Three types of systems

Public blockchain



Payment service



**CBDC** 



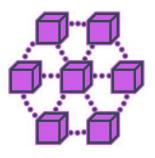


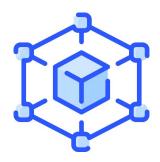
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Public blockchain

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CBDC







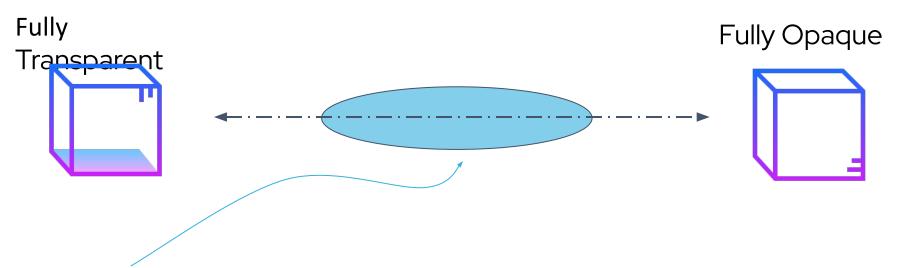


Different requirements for different jurisdictions



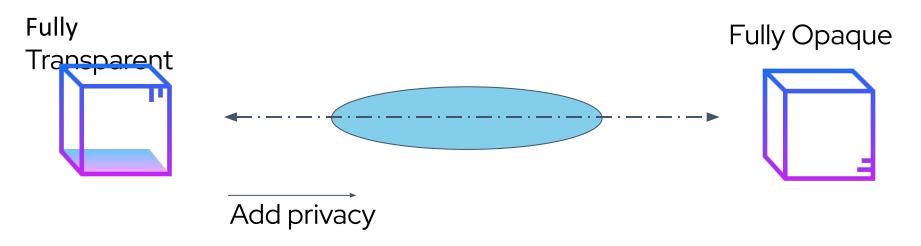


The axis of privacy



Goal: discovering the "ideal" middle ground between compliance and privacy.







Fully Opaque
Transparent

Add privacy

The axis of privacy



Add Compliance

#### A Fully Opaque system

Example: Zcash/Orchard - a fully opaque blockchain protocol

Privacy achieved using homomorphic commitments, encryption,

re-randomized signature scheme and a ZK proof system





#### A Fully Opaque system

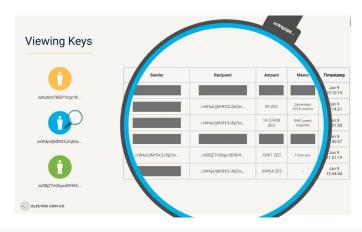
Example: Zcash/Orchard - a fully opaque blockchain protocol

- Privacy achieved using homomorphic commitments, encryption,
   re-randomized signature scheme and a ZK proof system
- Combines both "shielded" and "unshielded" transactions



Example: Zcash/Orchard viewing keys

- Provide the ability to disclose transaction history
- Viewing key is separate from the spending key





Example: Zcash/Orchard viewing keys

The viewing key will reveal the entire history





Example: Zcash/Orchard viewing keys

- The viewing key will reveal the entire history
- The revealed in/out addresses are

re-randomized

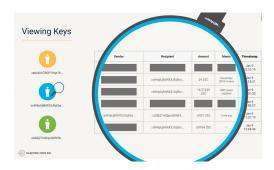


Example: Zcash/Orchard viewing keys

- The viewing key will reveal the entire history
- The revealed in/out addresses are

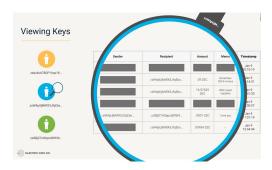
re-randomized

 Correct decryption using the viewing keys is not guaranteed by the consensus.



Example: Zcash/Orchard viewing keys, **Potential improvements** 

Enforcement by the protocol



Example: Zcash/Orchard viewing keys, **Potential improvements** 

- Enforcement by the protocol
  - Need to ensure properties of the plaintext





Example: Zcash/Orchard viewing keys, **Potential improvements** 

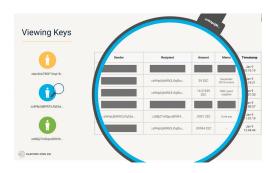
- Enforcement by the protocol
  - Need to ensure properties of the plaintext
  - ZK or Verifiable encryption





Example: Zcash/Orchard viewing keys, **Potential improvements** 

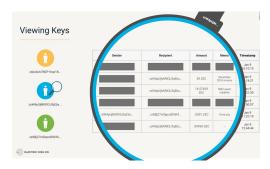
(Provable) Granularity





Example: Zcash/Orchard viewing keys, **Potential improvements** 

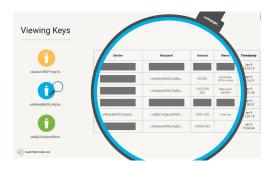
Disable address re-randomization (On per-asset basis)





Example: Zcash/Orchard viewing keys, **Potential improvements** 

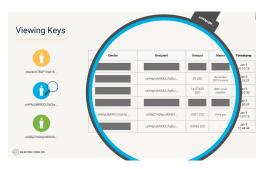
Global viewing key (On per-asset basis)





Example: Zcash/Orchard viewing keys, **Potential improvements** 

- Global viewing key (On per-asset basis)
- Potentially split between multiple parties (SS)
  - I.E. The regulator and the issuer



Direct applicability for a "shielded" blockchain





For a payment provider

• Decouple operating the service from transaction inspection





#### For a payment provider

- Decouple operating the service from transaction inspection
- The regulator will have the global viewing key



#### For a CBDC

- Decouple operating the service from transaction inspection
- The operation can be delegated to a company



Compliance feature: Blacklist enforcement



#### Desired properties:

- Ability to freeze funds for a suspicious address
- Unfreeze if suspicion was removed



Potential approach assuming cryptographic accumulators

• An authority commits the **updated** accumulator digest to the chain



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  - The canonical address

And / Or

The re-randomized address



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And / Or

The re-randomized address

Guarantee: Sender is not blacklisted at the time of the transfer.



#### **Blacklist / Whitelist**

#### Advantages

- Privacy preserving (verifier learns nothing except non-inclusion)
- User friendly (if legit, can be removed from the blacklist)



#### **Blacklist / Whitelist**

#### Advantages

- Privacy preserving
- User friendly

#### Disadvantages

- Who controls the blacklist? (consider a committee or a per-asset authority)
- Blacklisting re-randomized addresses might not be effective and there is a difficulty deduce the canonical address (consider removing re-randomization)



### Blacklist / Whitelist - Applicability

Direct applicability for a shielded Public blockchain





Compliance feature: Asset traceability



Compliance feature: Asset traceability

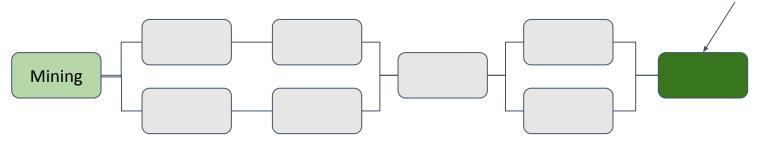
Desired properties:

 Ensure funds did not traversed via a malicious hop (post fact)



# Desired properties:



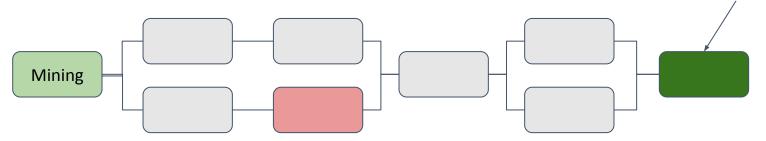


# Compliant



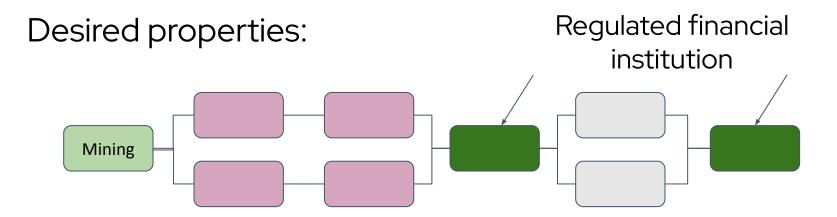
# Desired properties:





# Non compliant



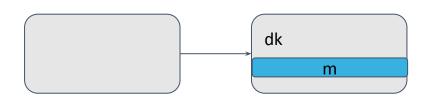


# Compliant



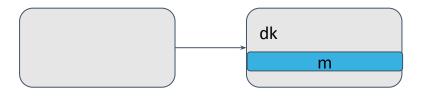
#### Potential approach assuming a "shielded" blockchain:

- Encrypt and attach the canonical identity (ID) as part of each transaction
- Prove correctness using
   Verifiable encryption / ZK
- $m=Enc_k(ID)$ , dk = f(ID)
- k



Who should have the key **k**?

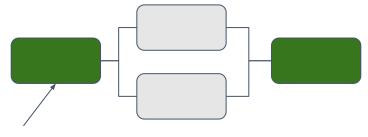
• Only the user - **elective disclosure** 





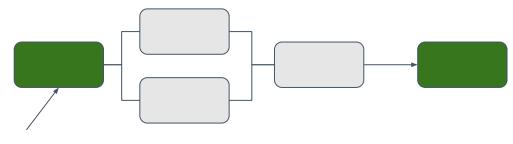
Who should have the key **k**?

- Only the user **elective disclosure**
- Good enough to prove compliance for one hop



Who should have the key **k**?

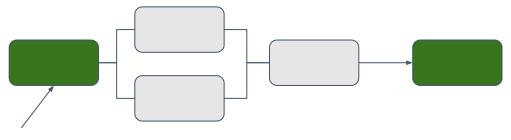
The issuer





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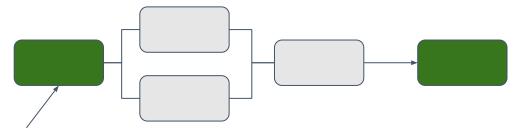
- The issuer
- The regulator





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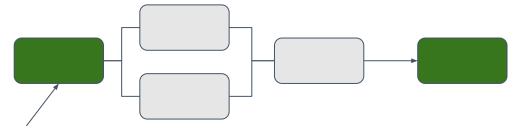
- The issuer
- The regulator
- Secret shared between both





#### Who should have the key **k**?

- The issuer
- The regulator
- Secret shared between both
- A committee



Provide the ability to create auditable and un-auditable transactions



Provide the ability to create auditable and un-auditable transactions

Desired properties:

- Large transactions can be audited (similar to bank transactions)
- Small transactions can not be audited (similar to cash)



UTT: Decentralized Ecash with Accountable Privacy

Alin Tomescu\* Adithya Bhat<sup>†</sup> Benny Applebaum<sup>‡</sup> Ittai Abraham<sup>§</sup>
Guy Gueta<sup>§</sup> Benny Pinkas<sup>¶</sup> Avishay Yanai<sup>§</sup>

April 9, 2022



UTT: Decentralized Ecash with Accountable Privacy

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#### Two events for a digital token:

- Mint event: a token is **minted** by being **signed** by the Central Bank
- Burn event: a token is nullified by being added to Central Bank nullifier list



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April 9, 2022

#### For privacy, UTT uses **re-randomizable signatures**:

- Users can re-randomize the original signatures they received and generate a new signature for the same token
- This new signature can be verified, but is un-linkable to the original signature



# An example UTT transaction

Alice has two tokens of \$50 and wants to pay Bob \$70. Alice has a privacy budget of \$500

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- •Three incoming tokens:
  - T<sub>1</sub> first token of Alice (with value of \$50)
  - $T_2$  second token of Alice (with value of \$50)
  - BT privacy budget token of Alice (with value of \$500)
- Three outgoing tokens:
  - T<sub>b</sub> outgoing token for Bob (with value of \$70)
  - T<sub>a</sub> outgoing token for Alice (with value of \$30)
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The proof verifies that  $T_1+T_2=T_a+T_b$ , and that  $BT'=BT-T_b$ 

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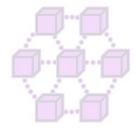
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#### In the context of a CBDC

- A well-defined central authority to assign the privacy tokens
- A well-defined set of approved users on the receiving end



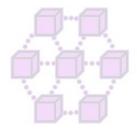


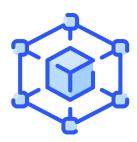




#### In the context of a **payment system**

- A well-defined central authority to assign the privacy tokens
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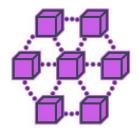






#### In the context of a public blockchain

 A central authority is replaced by consensus to provably assign the privacy tokens



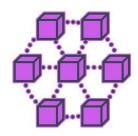






#### In the context of a public blockchain

- A central authority is replaced by consensus to provably assign the privacy tokens
- Require some sort of digital identity















No one-size fits-all solution







 Using an untested protocol for a CBDC deployment is undesirable.







Deploy a new public blockchain or payment system

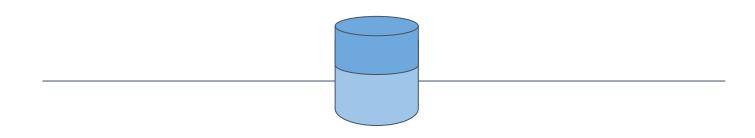




 Host multiple assets with different privacy/compliance guarantees on a single blockchain



 Host multiple assets with different privacy/compliance guarantees on a single blockchain

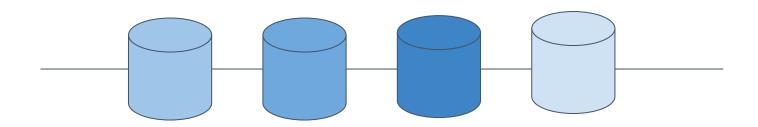


Control compliance feature using issuance flags





 Host multiple assets with different privacy/compliance guarantees on a single blockchain



Same blockchain, multiple shielded pools



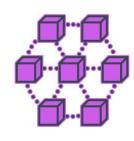


#### Conclusion

We have the cryptographic building blocks to balance compliance and privacy.







# **Privacy and Compliance**



