

# FIP - FIDIS Summer School

Privacy-Friendly Identity Management in eGovernment

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# Objective of this talk

- Explaining
  - legal drivers for
    - □ Privacy-Friendly
      - Identity Management
        - in eGovernment







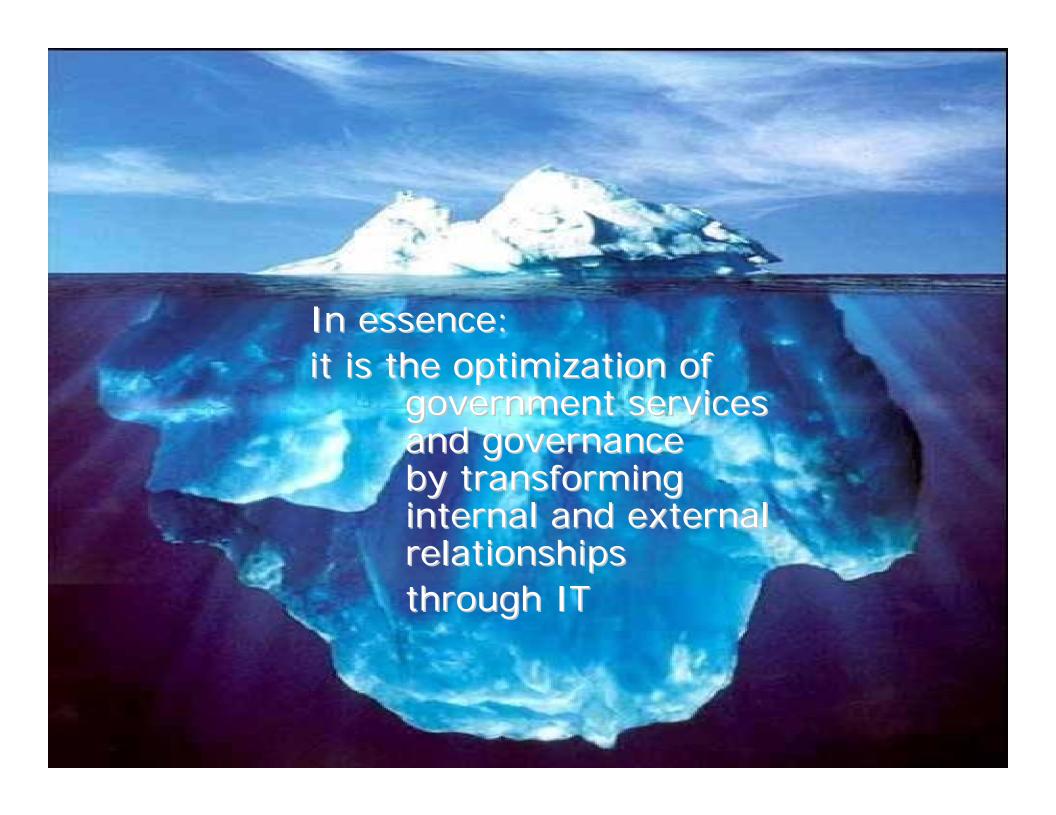
- What is eGovernment?
- What is organizational Identity Management?
- Limitation of current privacy research
- An alternative

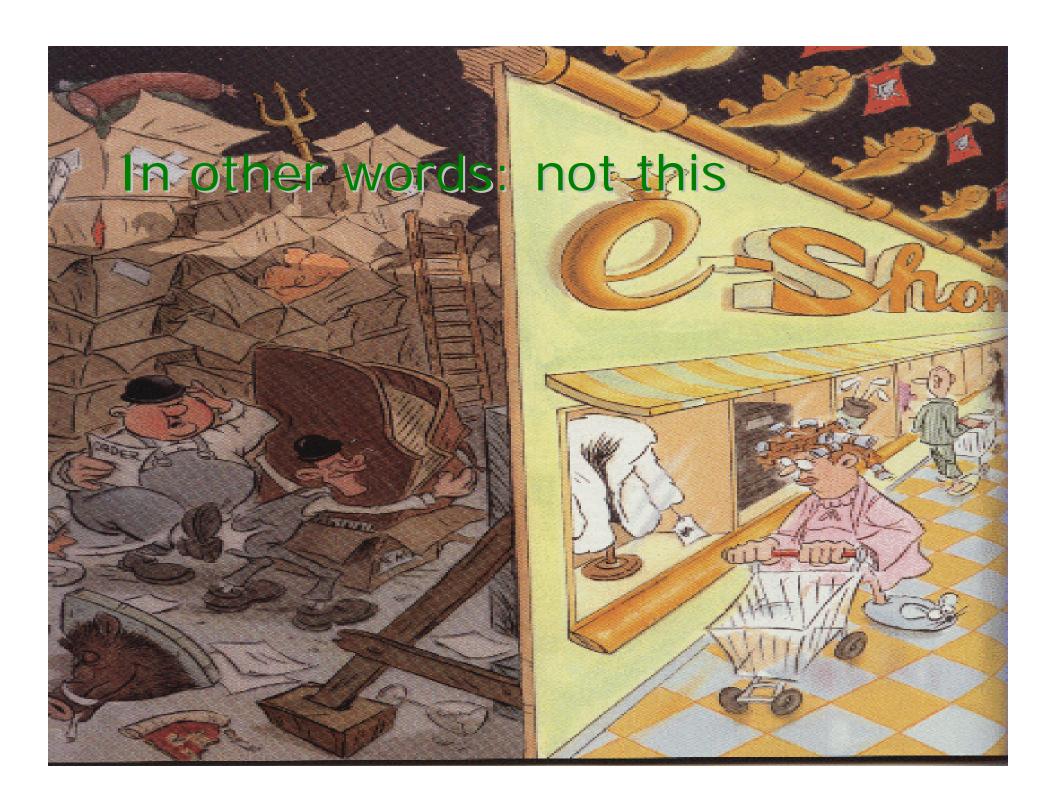




■ What is eGovernment?







#### **But this:**

cooperation with respect for each others competence: one virtual government

integration of back-offices

semantic, functional, technical interoperability, common identifiers client centric reengineering of service delivery within and across government levels

good information management

think global, act local

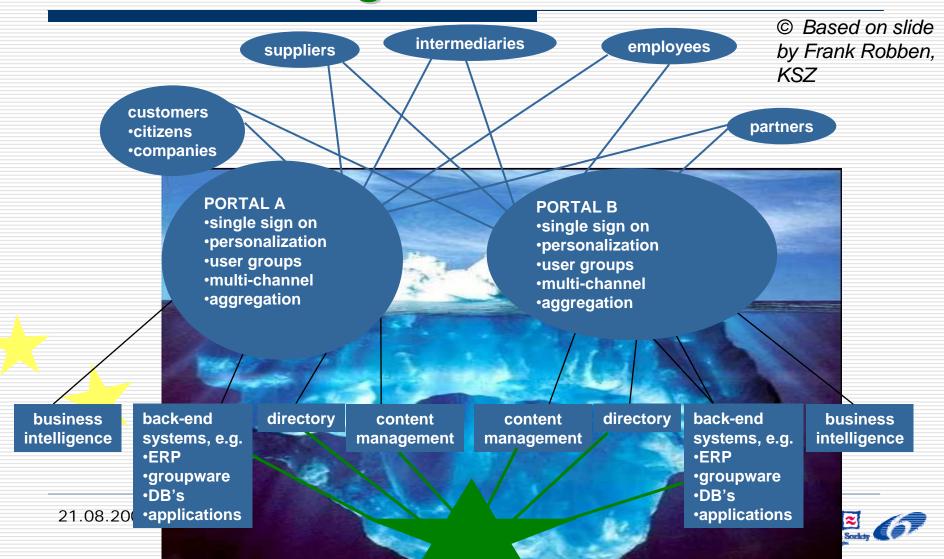
respect for the law, especially data protection privacy and IT regulation

measures to prevent a digital divide

security framework, access control authentication mechanisms

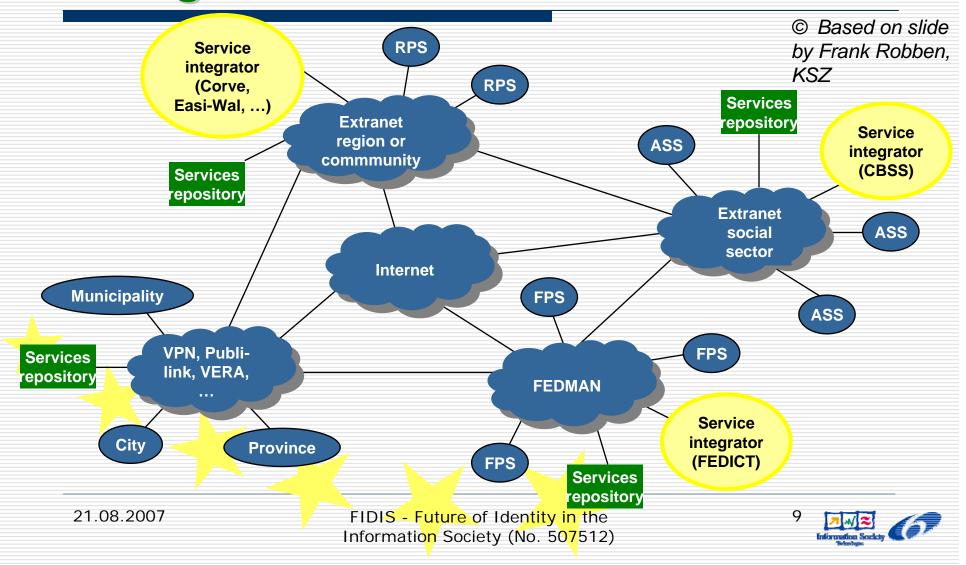


# One virtual government





# Integration of back-offices





- What is eGovernment?
- What is organizational Identity Management?
- Limitations of current privacy research
- Alternatives



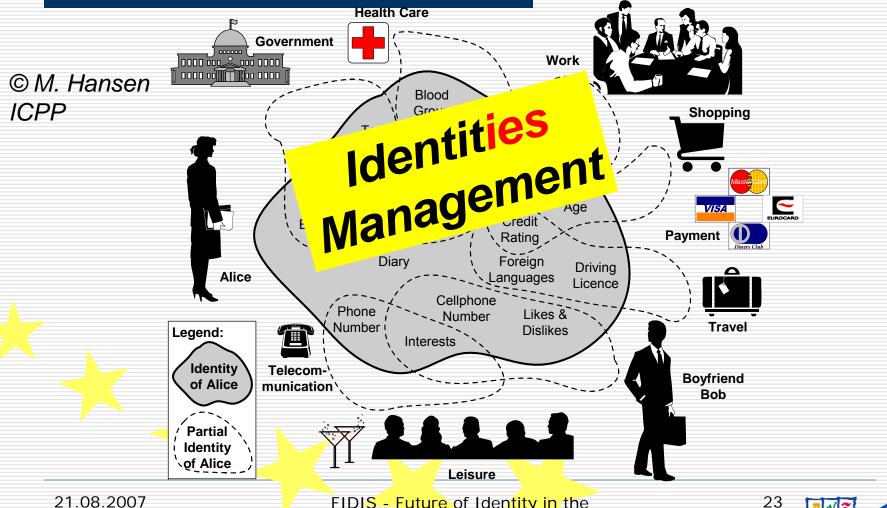


- What is eGovernment?
- What is organizational Identity Management?









FIDIS - Future of Identity in the Information Society (No. 507512)



- □ IDM is:
  - the definition, designation and administration of identity attributes
  - as well as the administration of the choice of the partial identity to be (re-) used in a specific context,
  - to manage the access to and the usage of online applications, services and resources.
- ☐ It includes:
  - the management of identity attributes
  - by:
    - their owners (user-side IDM) and/or
    - those parties with whom the owners interact (services-side IDM).



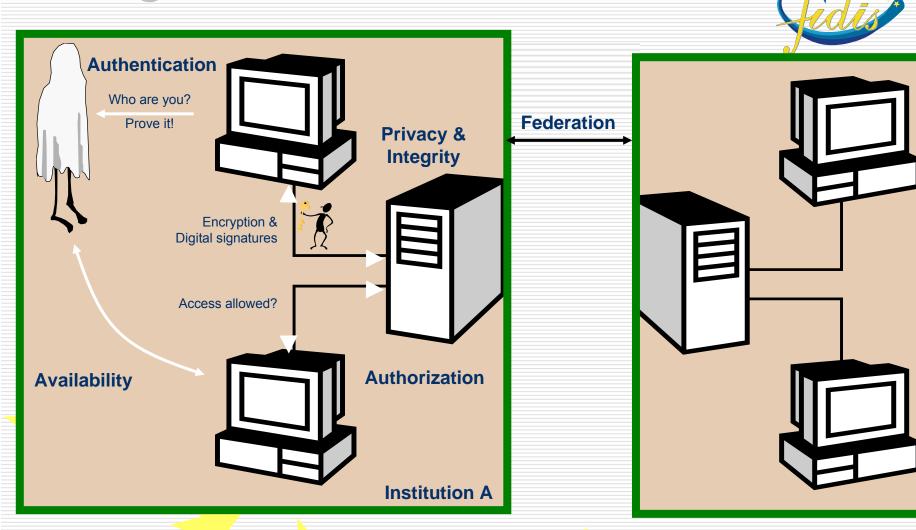


Type 1	Acoust Marie III	Account Management:  assigned identity	by organisation
Type 2	Profile Profile	Profiling: <i>derived identity</i>	by organisation
Type 3	\$	Management of own identities: chosen identity	by user himself supported by service providers

© FIDIS D2.3, D3.1

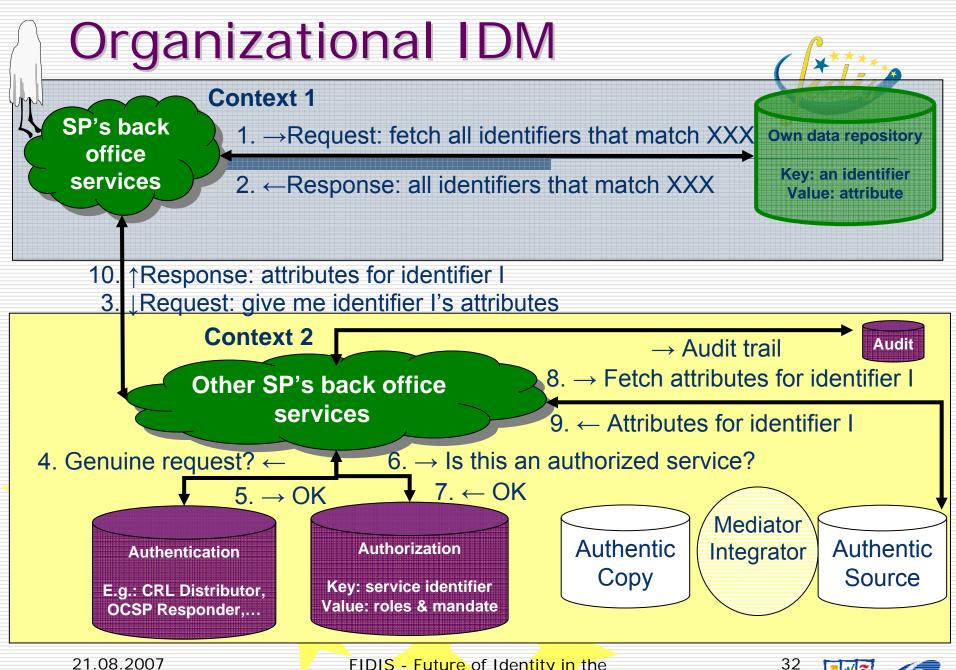
There are hybrid systems.





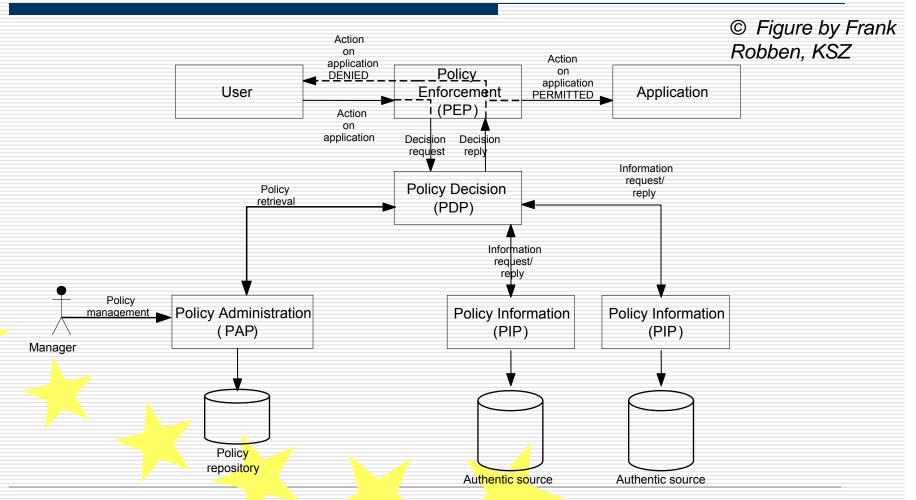
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- What is eGovernment?
- What is organizational Identity Management?
- □ Limitations of current privacy research







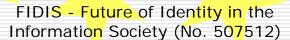
- Drivers for privacy by design
  - "Natural people should be helped to protect themselves from undesired identification and profiling, and, generally, to enforce their privacy and data protection rights".
  - When identification is always required, it is possible that even though a number of data interconnections are not authorized, or illegal, they will take place anyway" → risk
  - "Trust relationships have to do with much more than identification, and identification is certainly not always necessary" → data minimization
  - "The access to services is not granted on the basis of identification, but on the basis of a capacity or competence" > authorization





Drivers for privacy by design







#### **Current research**

usercontrolled
contextdependent
role and
pseudonym
management
(FIDIS type

3)

Supporting device and / or supporting party

User

Trusted area

Context-

dependent pseudonyms

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- An application is designed in a (perfectly) privacyenhancing (PE) identity management enabling way if,
  - in addition of being compliant with data protection regulation,
  - neither the pattern of sending/receiving messages
  - nor the attributes given to entities (i.e., natural and legal persons, computers)
  - imply more linkability
  - than is strictly necessary to achieve the purposes of the application.





- But... is PE IDM a requirement?
  - Privacy is a relative human right other important rights limit the right to privacy, e.g., the public interest (especially in eGovernment)
  - Complying to data protection does not necessarily require anonymity, nor pseudonymity and certainly not user-centricity.
  - We could theoretically cope with the liability and other risks by other measures, without privacy by design (e.g., insurances)
  - Anonymous/pseudonymous online transactions require a complex and thus costly, well functioning privacy enhanced identity management infrastructure
    - < cost-reduction, < effectiveness, < user experience etc.</p>
  - Is PE-IDM an obligation for the data controller?





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- In eGovernment, the answer seems to be "no"
  - no obligation for <u>PE</u> IDM as the default position for all government data exchange in eGovernment
- □ Why?
  - why imposing more limitations than strictly necessary? (> privacy = < efficiency?)</p>
  - only user-control where really necessary
  - only different identifiers where really necessary
- Result
  - no privacy by design in eGovernment?
  - Is there an alternative to <u>PE</u> IDM?





- □ A privacy <u>friendly</u> IDM <u>system</u>
  - addresses the interest of the individual in controlling, or at least significantly influencing the processing of data about him/her-self and
  - complies with the applicable privacy and data protection regulation
- ☐ It is thus:
  - not necessarily user-centric
  - not necessarily focused on pseudonym management





- Example where it can be non-user-centric:
  - The Belgian Crossroads Bank for Social Security:
    - □ organizational IDM (FIDIS type 1), used inter alia for account and resource provisioning, access control etc.
    - □ data is only accessible and exchangeable with thereto authorized entities, <u>upon submission</u> <u>of an authorization</u> by (a subcommittee of the Belgian privacy commission.



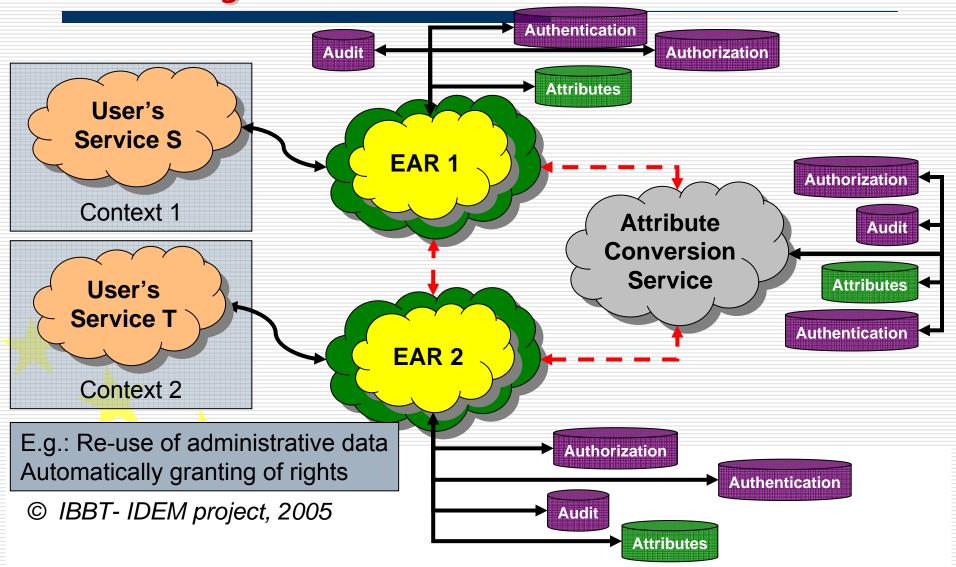


- Pseudonym management is, for example necessary in eGovernment:
  - because of the privacy sensitivity of certain data
  - because the data processing requires this type of investment
  - health data, judicial data











- ☐ However, in all other cases
  - pseudonym management is not necessary
  - the focus could, for example lay on:
    - □ technical enforcement of authorizations via privacy policy enforcement (e.g., extension of XACML)
    - transparency, e.g., via monitoring and pushing information about data processing back to the data subject





- Arguments for privacy by design developed in the paper:
  - Objective risk liability (art. 23 DP Directive) → controller is responsible when processing is not compatible with DP regulation)
  - Obligation to take all appropriate measures given state of the art and nature of data, cost data processing (art. 17 DP Directive)
  - Privacy protection is part of DP regulation (art. 1 DP Directive)





- Own considerations:
  - access control is already being implemented in eGovernment → extra privacy layer/filtering is not disproportionate
  - avoiding data processing in other contexts is a minimum-requirement → e.g. Belgian eID – one step to far (!)
  - transparency, monitoring → has to be done anyway, for security purposes → not disproportionate to require data that relates to the processing of the personal data, put that info in the logs and push it back to the data subject
    - □ static: what info about me in "authentic sources"
    - dynamic: what info is being consulted by whom for what purposes?







TACK!

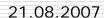
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