**Beyond GDPR** 

# Anonymization



true

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Beyond GDPR

TITRE : Anonymization SOUS-TITRE : Beyond GDPR

# WHO I AM

- Damien Clochard
- PostgreSQL DBA & Co-founder at Dalibo
- President of PostgreSQLFr Association

#### WHO I AM NOT

- I Am Not A Lawyer
- I Am Not A Privacy Expert
- Don't take my word for it / Check the links !

#### **MY STORY**

#### MENU

- GDPR: 1 year later
- Why Anonymization is hard
- Anonymization Pipelines
- PostgreSQL Anonymizer

# **GDPR**

- Individual Rights
- Principles
- Impact
- Pseudonymization vs Anonymization

# **GDPR: INDIVIDUAL RIGHTS**

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- · The right to object
- etc.

(source: Individual Rights)

# **GDPR: PRINCIPLES & CONCEPTS**

- · Lawfulness, fairness and transparency
- Security
- Data Minization
- Privacy By Design
- Data Protection By Design
- Pseudonymization
- Storage Limitation
- Accuracy
- Purprose Limitation

(source: GDPR Principles)

GDPR

#### SANCTIONS ARE COMING

- July 2019 : Marriott (UK) fined 110M€
- July 2019 : British Airways (UK) fined 204 M€
- June 2019 : Sergic (France) fined 400 k€
- June 2019 : LaLiga (Spain) fined 250 k€
- May 2019 : Municipality of Bergen (Norway) fined 170 k€
- April 2019 : Airbus (France) fined 200k€
- And many more

(source: GDPR Enforcement Tracker)

#### **BEWARE OF ARTICLE 32!**

Most sanctions are linked to Article 32:

« Insufficient technical and organisational measures to ensure information security »

(source Article 32 - Security of processing)



# IN OTHER WORDS: ``DATA LEAKS"

#### **PSEUDONYMIZATION**

« Personally identifiable information is pseudonymised when it is modified in a way that it can no longer be linked to a single data subject without the use of additional data. »

#### **ANONYMIZATION**

Not even mentioned in the GDPR !

# **DOES IT REALLY MATTER ?**

#### YES

Pseudonymized data still falls within the scope of the Regulation.

#### **2 DIFFERENT THINGS**

- Pseudonymization is a security requirement
- Anonymization is an exit door

# **PSEUDONYMIZATION**

The **additional data** should be kept separate from the pseudonymized data and subject to technical and organisational measures to make it hard to link a piece of data to someone's identity

# **EXAMPLE: ENCRYPTION**

Encryption is not anonymization !

Encrypted data are still covered by GDPR because the original data can be retrieved with the encryption key.



# WHY ANONYMIZATION IS HARD

- Singling out
- Linkability
- Inference

(source: WP29 Opinion on Anonymisation Techniques)

#### SINGLING OUT

The possibility to isolate a record and identify a subject in the dataset.

```
SELECT * FROM employees;
```

id | name | job | salary 1578 | xkjefus3sfzd | NULL | 1498 2552 | cksnd2se5dfa | NULL | 2257 5301 | fnefckndc2xn | NULL | 45489 7114 | npodn5ltyp3d | NULL | 1821

#### LINKABILITY

Identify a subject in the dataset using other datasets

- Netflix Ratings + IMDB Ratings
- Hospital visits + State voting records

(sources: Netflix prize + Hospital Reidentification )

# INFERENCE

Identify a subject using a set of indirect identifiers.

87% of the U.S. population are uniquely identified by date of birth, gender and zip code

(source : Latanya Sweeney)



# **THIS IS A LOSING GAME !**

you can't prove that re-identification is impossible

(source: De-indentification still doesn't work)

#### **GDPR GIVES A MARGIN OF ERROR**

« To determine [if] a person is identifiable, account should be taken of all the means **reasonably likely to be used** [...] to identify the person directly or indirectly.

« To ascertain whether means are reasonably likely to be used to identify the 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 »

(source: Recital 26)

# **MESURE THE THREAT**

This means you have to measure the "reasonable risk" of re-identification, on a regular basis.



# **ANONYMIZATION PIPELINES**

Minimizing the risk of data leaks by reducing the attack surface

This is a direct implementation of the "Storage Limitation" principle

**BASIC EXAMPLE** 



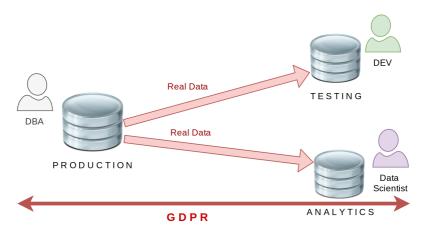
PRODUCTION



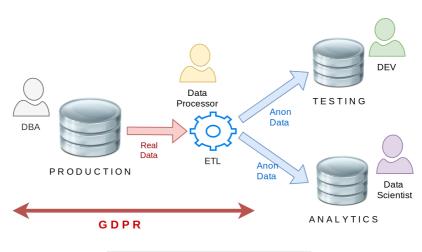


ANALYTICS

# WORST SCENARIO

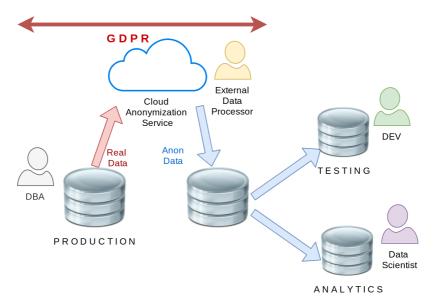


ETL

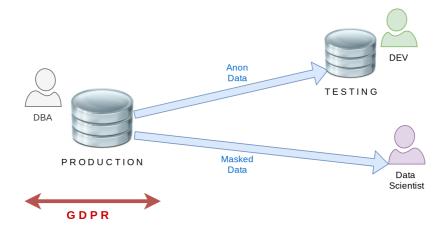




# **CLOUD ANONYMIZATION**



# **POSTGRESQL ANONYMIZER**



# PostgreSQL Anonymizer

# WHAT IS THIS ?

- Started as a personal project last year
- Now part of the "Dalibo Labs" initiative
- This is a prototype !
- Currently in version 0.4

# GOALS

- Declare masking rules within the database model
- Anonymization is done internally
- Dynamic Masking or In-Place Substitution
- Batteries included : Builtin masking functions
- Inspired by MS SQL Server Dynamic Data Masking



# **EXAMPLE: REAL DATA**

=# SELECT * FROM customer;									
id   full_name				-		-			
+	-+-		+-		+-				
911   Chuck Norris	I	1940-03-10	I	75001	I	12			
112   David Hasselhoff	I	1952-07-17	I	90001	I	423			

# **EXAMPLE: ANONYMIZED DATA**

<pre>=# SELECT * FROM customer id   full_name</pre>	ĺ.	birth	I	zipcode	I	fk_shop
911   Michel Duffus 112   Andromache Tulip	I	1970-03-24	I	63824	I	12

# INSTALL

\$ sudo pgxn install ddlx
\$ sudo pgxn install postgresql\_anonymizer

# INSTALL

Using the Community RPM Repo:

```
$ yum install https://.../pgdg-redhat-repo-latest.noarch.rpm
```

\$ yum install postgresql\_anonymizer12

(thanks Devrim!)

#### CONFIGURE

shared\_preload\_libraries = '[...], anon'

# LOAD

=# CREATE EXTENSION IF NOT EXISTS anon CASCADE; =# SELECT anon.load();

# **DECLARE A MASKING RULE**

SECURITY LABEL FOR anon ON COLUMN customer.zipcode IS 'anon.random\_zipcode()';

(thanks Alvaro!)

#### **NOW WE HAVE 3 OPTIONS**

- In-Place Anonymization
- Anonymous Dumps
- Dynamic Masking



#### **IN-PLACE ANONYMIZATION**

- =# SELECT anon.anonymize\_column('customer','zipcode');
- =# SELECT anon.anonymize\_table('customer');
- =# SELECT anon.anonymize\_database();

#### **IN-PLACE ANONYMIZATION**

This will update all lines of all tables containing at least one masking rule.

This is gonna be slow and trigger heavy write workloads.

#### **ANONYMOUS DUMPS**

=# SELECT anon.dump();

#### **ANONYMOUS DUMPS**

\$ psql [...] -qtA -c 'SELECT anon.dump()' your\_dabatase > dump.sql

#### **DYNAMIC MASKING**

#### **DYNAMIC MASKING**

Step 1 : Activate the dynamic masking engine

=# CREATE EXTENSION IF NOT EXISTS anon CASCADE;

=# SELECT anon.start\_dynamic\_masking();

#### **DYNAMIC MASKING**

Step 2 : Declare a masked user

=# CREATE ROLE skynet LOGIN;

=# SECURITY LABEL FOR anon ON ROLE skynet

-# IS 'MASKED';

The masked user has a read-only access to the anonymized data of the masked tables.

#### DYNAMIC MASKING

Step 3: Declare the masking rules
SECURITY LABEL FOR anon ON COLUMN people.name
IS 'MASKED WITH FUNCTION anon.random\_last\_name()';

SECURITY LABEL FOR anon ON COLUMN people.phone IS 'MASKED WITH FUNCTION anon.partial(phone,2,\$\$\*\*\*\*\*\$\$,2)';

#### **DYNAMIC MASKING**

Step 4 : Connect with the masked user
=# \! psql peopledb -U skynet -c 'SELECT \* FROM people;'

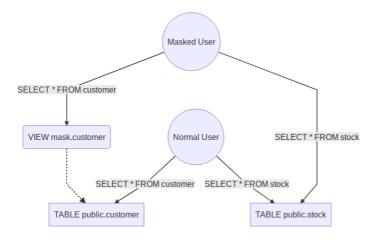
id | fistname | lastname | phone

T1 | Sarah | Stranahan | 06\*\*\*\*\*11

(1 row)



# **HOW IT WORKS**



# **HOW IT WORKS**

Basically :

- 500 lines of pl/pgsql
- An event trigger on DDL commands
- Silently creates a "masking view" upon the real table
- Tricks masked users with search\_path
- use of TABLESAMPLE with tms\_system\_rows for random functions

# **MASKING FUNCTIONS**

The extension provides functions to implement 5 main anonymization techniques:

- Noise Addition
- Shuffling / Permutation
- Randomization
- Faking / Synthetizing
- Partial destruction

#### **NOISE ADDITION**

```
=# SECURITY LABEL FOR anon
-# ON COLUMN employee.salary
-# IS 'MASKED WITH FUNCTION
-# anon.add_noise_on_numeric_column(user, salary, 0.33)
-# ';
```

All values of the column will be randomly shifted with a ratio of +/- 33%

# **NOISE ADDITION**

- The dataset remains meaningful
- AVG() and SUM() are similar to the original
- · works only for dates and numeric values
- "extreme values" may cause re-identification ("singling out")

#### SHUFFLING

```
=# SECURITY LABEL FOR anon
-# ON COLUMN employee.fk_company
-# IS 'MASKED WITH FUNCTION
-# anon.shuffle_column(employee, fk_company, id)
-# ';
```



#### SHUFFLING

- The dataset remains meaningful
- Perfect for Foreign Keys
- · Works bad with low distribution (ex: boolean)
- The table must have a primary key

#### RANDOMIZATION

```
=# SECURITY LABEL FOR anon
-# ON COLUMN employee.birth
-# IS 'MASKED WITH FUNCTION
-# anon.random_date_between(''01/01/1920'',now())
-#';
```

#### RANDOMIZATION

- Simple and Fast
- Usefull for columns with NOT NULL constraints
- Useless for analytics

#### FAKING

=# SECURITY LABEL FOR anon
-# ON COLUMN employee.lastname
-# IS 'MASKED WITH FUNCTION
-# anon.fake\_last\_name()

-# ';

# FAKING

- Just a more elaborate version of Randomization
- Great for developpers and CI tests
- You can load your own dictionnaries !

# PARTIAL DESTRUCTION

- =# SECURITY LABEL FOR anon
- -# ON COLUMN employee.phone
- -# IS 'MASKED WITH FUNCTION anon.partial(phone,4,'\*\*\*\*\*\*',2)';

+33142928107 becomes +331\*\*\*\*\*07

#### PARTIAL DESTRUCTION

- Perfect for phone number, credit cards, etc.
- The user can still recognize his/her own data
- Transformation is **IMMUTABLE**
- Works only for TEXT / VARCHAR types

#### **KNOWN LIMITATIONS**

- PostgreSQL 9.6 and later
- Dynamic Masking works with only one schema



# **FUTURE DEVELOPMENTS**

- Research on K-Anonymity
- Mesure the risk of reidentification
- Suggest masking rules based on heuristics
- Implement Generalization functions

#### **OTHER TOOLS FOR POSTGRES**

- Differential Privacy extension by Google
- Smart Sampling with pg\_sample
- pgantomizer

# **HOW TO CONTRIBUTE ?**

- Feedback and bugs !
- Images and geodata
- Join the project at :

https://gitlab.com/dalibo/postgresql\_anonymizer

# **IN A NUTSHELL**

- GDPR sanctions are really real
- Data Leak is your main risk
- Reduce your attack surface ("Storage Limitation")
- Anonymize whenever you can
- Anonymize inside the database
- Encryption is not Anonymization !

# **OUR NEXT CHALLENGE:**

#### **PRIVACY BY DESIGN**

- Developpers should write the masking rules
- It's hard.... PostgreSQL must help them.
- The Postgres community has won so many battles
- Now we have to focus on data privacy

#### WE'RE HIRING !

Dalibo is a french-speaking employee-owned remote-working company

We're looking for:

- PostgreSQL Development DBAs
- PostgreSQL Production DBAs
- Python Backend Developer
- Key Account Manager



# **GRAZIE** !

- Contact : damien.clochard@dalibo.com
- Follow : @daamien
- Feedback : https://2019.pgconf.eu/f
- Other Projects : Dalibo Labs