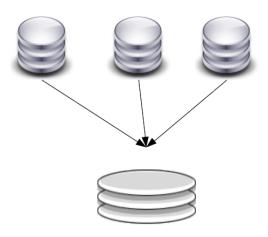
# X-Road Pseudonymization Service How (not) to design a security architecture

Jan Willemson

Cybernetica

February 6, 2011 Theory Days

# Why Pseudonymization?



# Why Pseudonymization?

- There are datasets containing sensitive, personally identifiable information
  - Medical, financial, social
- There is a need to perform statistical surveys and produce aggregated results based on several of those datasets
- The statistician is not granted to see the personal details, but standard IDs are needed for linking
- Sometimes, fully cryptographic methods (secure MPC, homomorphic encryption) are not applicable
  - Performance issues
  - High implementation costs
  - No need for strong security guarantees
  - Political fear of everything unknown
- So we will replace the IDs with pseudonyms



## What are the Security Requirements?

- Who should be able the access the IDs?
  - Data donor, TTP?
- Who should be able to access the data fields?
  - ▶ Data donor. Researcher. A person him/herself? A relative? TTP?
- Is reidentification using the data fields a threat?
  - ▶ The Netflix/IMDB case
  - Usually this threat is ignored even though it renders most of the heavy-weight pseudonymization techniques void
- What are the "bad" guys/coalitions and what can they do?
  - ▶ Data donors? Researchers? Sysadmins? Users? TTP?
- Who and how should be able to grant linking?
  - Researcher? TTP?

# What are the Security Requirements?

- Who should be able the access the IDs?
  - Data donor, TTP?
- Who should be able to access the data fields?
  - ▶ Data donor. Researcher. A person him/herself? A relative? TTP?
- Is reidentification using the data fields a threat?
  - ► The Netflix/IMDB case
  - Usually this threat is ignored even though it renders most of the heavy-weight pseudonymization techniques void
- What are the "bad" guys/coalitions and what can they do?
  - ▶ Data donors? Researchers? Sysadmins? Users? TTP?
- Who and how should be able to grant linking?
  - Researcher? TTP?

#### Conclusion:

There is no universal definition of security for pseudonymization

#### Researcher's view

Give us all the data so that we could link anything as we please to do a lot of research.

#### Researcher's view

Give us all the data so that we could link anything as we please to do a lot of research.

#### Regulator's view

Hey, guys, you are not here to please yourself, but to serve the society. We tell you when and what to link.

#### Researcher's view

Give us all the data so that we could link anything as we please to do a lot of research.

#### Regulator's view

Hey, guys, you are not here to please yourself, but to serve the society. We tell you when and what to link.

#### Public Information Act, §43<sup>1</sup>(2):

A structured body of data processed within a database may consist exclusively of unique data contained in other databases.

#### Researcher's view

Give us all the data so that we could link anything as we please to do a lot of research.

#### Regulator's view

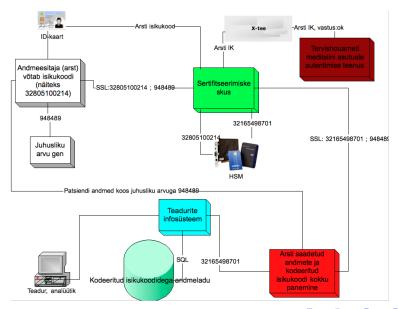
Hey, guys, you are not here to please yourself, but to serve the society. We tell you when and what to link.

#### Public Information Act, $\S 43^1(2)$ :

A structured body of data processed within a database may consist exclusively of unique data contained in other databases.

Read it as: Aggregated databases may not be used to create new aggregated databases. You will have to start from the original sources.

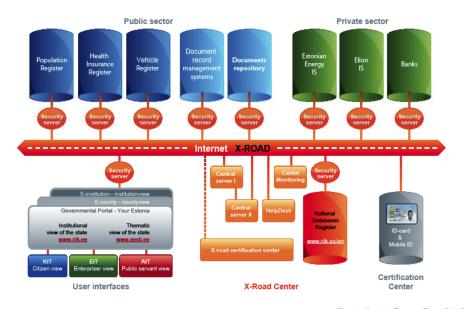
### Pseudonymization in Estonia: the First Attempt



# Pseudonymization in Estonia: the First Attempt Highlights

- In order to reconnect the pseudonymized IDs with data fields, random transport identifiers were used
- Pseudonymization was implemented via encryption by the HSM of Estonian national CA
  - ▶ Essentially, the CA acted as a TTP, seeing all the sensitive IDs
- Since the people at the CA only knew, how to perform public key operations on the HSM, they generated a key pair and threw half of it away
- During the first live tests it occurred that the HSM was unable to handle simultaneous encryption requests coming from different sources
- When a queueing mechanism was added, under certain circumstances the whole operation of the CA needed restarting

#### X-Road Infrastructure



#### X-Road Infrastructure: Characteristics

- Unified XML-based data exchange format
- Each database is supplied with a security server acting as a simple, but flexible HSM
- Minimal number of central services
  - Certification
  - Logging
  - Monitoring
- All the data exchange happens point-to-point and typically presumes an explicit agreement

### X-Road Pseudonymization Service: General Principles

- No new TTP/centralized services, if possible
  - ► Instead, make full use of the existing infrastructure (security servers)
  - ► Since the security servers will hold the pseudonymization keys anyway, they may as well generate and distribute them
- Pseudonymization does not have massive performance requirements, but it should be as robust as possible
- No need for further actions with the aggregated database
  - Hence, no need for commutative cryptography or public key cryptography in general
  - We will use symmetric encryption
  - ▶ One-wayness based on public key encryption does not add much, since the ID space is small ( $\approx 70\cdot 10^6$  in case of Estonian IDs) and can be brute forced by the owner of the key anyway

### X-Road Pseudonymization Service: Protocols

- Key generation and distriubution
  - (Security server of) data donor  $D_1$  will generate an AES-256 key  $K_R$
  - ▶ He will send a sigcrypted blob  $Sig_1(Enc_i(K_R))$  to another data donor  $D_i$
  - ▶ *D<sub>i</sub>* will verify the signature and decrypt the key
- Database aggregation
  - ▶ When sending data from  $D_i$  to the aggregated researcher database R, the IDs are encrypted with the key  $K_R$  so that the records become  $(Enc_{K_R}(ID), Data(ID))$
  - ▶ After all the pseudonymized datasets are transmitted, R links them based on the values  $Enc_{K_R}(ID)$  as identifiers

# X-Road Pseudonymization Service: Implementation and Benchmarks

- Key transmission is performed by a physical carrier
- Identifying the ID to pseudonymize is performed by standard XPath technology using pugiXML library
- Testing was done on security servers running Ubuntu Linux 10.04 LTS on Intel Core2 8200 processors
- Pseudonymization can happen in several parallel threads (8 in default settings)
- Data throughput achieved was 120MBps
- Memory requirement 45 . . . 55 MB per thread
- Our pseudonymization service was included into X-Road version 5, deployment of which in Estonia started on January 1st 2011

#### Thank you!

• Who asks a question may go to have lunch

### Thank you!

- Who asks a question may go to have lunch
- Logically, I did not say anything about the people who do not ask questions. They can go to have lunch, too