

Methods and Tools for GDPR Compliance through

Privacy and Data

Protection 4 Engineering

Model-driven Engineering Tool and Method for Privacy and Data Protection by Design

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- Introduction and objectives
 - Privacy and Data Protection by Design (PDPbD): context and challenges
- Proposed method for PDPbD
- Tool support for the method
 Personal Data Detector Module
 Module for Privacy Model-driven design
 Module for Code Validation
- Summary of achievements



Privacy and Data Protection by Design

Context

Design engineers' ecosystem:

- Several stakeholders and actors
- Variety of needs and objectives
- Solution for conflicting goals/reqs. Indiv
- Designer's questions to address:
 - Which privacy-aspects introduce during systems design?
 - How identified concerns can be considered at early design steps?
 - How privacy-by-design can be effectively realized?





PDP by Design Method

Main characteristics:

- Identification of personal data
- Combined bottom-up and topdown approaches:
 - From data structures to data and data-flow (process) models
 - Allocation over an architecture model
 - Architecture refinement towards code
- Models improved by Privacy-bydesign strategies (ISO/IEC 27550)
 Validation of properties at code level



Tool support for the PDPbD method



PDP4E

Tool support for the PDPbD method





PDPbD Framework

1. Personal Data Detector Module

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PDD Overview





PDD Output

Every column is scored for each level:





Leveraging Open Linked data: Graph Creation





Leveraging Open Linked data: Graph Creation



07/09/2021



processed and refined by the user

Related persons are recalculated from new concepts refined by the user

connect entities in the DB with external data subjects



PDD frontend

Personal Data Detector			Persona	l Data Detector					
Connection	and Seen Data	Results Detection Results C Re-Bun Analysis	Conver Conver Database	Table: vehicle Wiki Data Definit Search Wiki Definit Wiki Data ID G42889	ions Relate	nd Persons Name vehicle	Description mobile machine that transports people, animats or cargo	eutro Hetto 15	ts tion Results
address address registration address TEXT	authorized_vehicle + summarized_vehicle + summarized_vehicle + summarized_vehicle + centralized_vehicle TXT			Q334166 Q13629441 Q9687 Q752870 Q192152 PropertyoP1876		mode of transport electric vehicle traffic collision motor vehicle sport utilize vehicle vehicle	any form of whicke or system used to transport people or goods from on whicke propelled by one or more electric motors collision of a vehicle with another vehicle, pudestrian, animal, or other obj self-propelled wheeled vehicle type of automobile veasit involved in thit mission, volvage or event.	e place to another	Ì
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PDPbD Framework

2. Privacy model-driven designer

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Privacy model-driven designer

Implementation

PDP4E





- > Goal: select GDPR requirements to be fulfilled or analysed at the design phase
- > A model-driven interface amenable to:
 - □ Incorporate privacy and GDPR requirements
 - □ Keep traceability of requirements to be fulfilled (functional, GDPR)
- Model-driven tool support: interoperable MDE interfaces requirements-design
 - □ Feature 1: set links to allocate GDPR requirements to design (dependencies)
 - □ Feature 2: set links for satisfiability <<satisfy>>
 - □ Feature 3: set links for unitary test cases <<verify>>

Continue the development cycle

1. Select GDPR requirements

Overview of selected requirements Privacy concern

Notifications. This feature is meant to ensure the respect of the Data Subject rights, in particular, the right to be informed by the respective Controllers (or Processors) whenever a privacy breach impacting her/his Personal Data occurs.

v 🛅 connectedVehicle

> 🎇 <Package Import> UML Primitive Types

- FunctionalRequirements
- R-01: the vehicle shall communicate its states to the neighboring vehicle
- R-01-01: The vehicle collect data vehicle state from sensors and GPS R-01-02: a vehicle shall send CAM message to CAM Network

Requirement model 🔿

GDPRReq-1: IF process :"A vehicle Send CAM message" processes :"CAM Data VehicleID public certified key " of :"VehicleOwner" THEN the Process :"A vehicle
 GDPRReq-1: IF process :"A vehicle Send CAM message" processes :"CAM Data VehicleID public certified key " of :"VehicleOwner" THEN the Process :"A vehicle
 GDPRReq-2: IF process :"A vehicle Send CAM message" processes :"CAM Data VehicleID public certified key " of :"VehicleOwner" THEN the Process :"A vehicle
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 GDPRReq-3: IF process :"A vehicle Send CAM message" processes :"CAM Data VehicleID public certified key " of :"VehicleOwner" THEN the Process :"A vehicle
 GDPRReq-3: The purpose :"R-01" of the PersonalData :"CAM Data VehicleID public certified key " of :"VehicleOwner" THEN the Process :"A vehicle
 GDPRReq-13: The purpose :"R-01" of the PersonalData :"CAM Data Sendified, explicit, legimate, and compatible.
 GDPRReq-18: The purpose :"R-01" of the PersonalData :"vehicleID" shall be specified, explicit, legimate, and compatible.
 GDPRReq-18: The purpose :"R-01" of the PersonalData :"vehicleOwner" shall be specified, explicit, legimate, and compatible.

Selected GDPR requirement ->

GDPRReq. When the <CITSFrame> breach is likely to result in a high risk to the rights and freedoms of <VehicleOwner>, the <RSUServiceProvider> shall communicate the <CITSFrame> breach to the <VehicleOwner> without undue delay.

1. Select GDPR requirements to be satisfied

2. Develop a data-oriented model

3. Built-in privacy techniques for data-oriented models

4. Develop a process-oriented model

5. Built-in privacy techniques for process-oriented models

Continue the development cycle

DesignNotOK

DesignOK



- Goal: capture the data structures under study to analyse conformity w.r.t. privacy precepts
- A modeling language amenable to:
 Reuse outcomes from the PDD: scores for classifying personal (non-personal) data
 Enrich, decompose, refine data structures

Model-driven tool support: a UML Class-like diagram to model data structures
 Feature 1: several built-in data types : Generic, Composite, Table, Data links, Opaque data
 Feature 2: user defined data structures (suitable for framework customization)
 Feature 3: full compatibility with SysML Requirement models
 Feature 4: inherited traceability with GDPR requirements (PDP4E-Req tool)

Continue the development cycle



3. Strategy for data-oriented model

- Goal: apply known strategies to ensure data protection
- Data-oriented strategies proposed by ENISA, ISO/IEC-27550

Minimize

Separate

Abstract

Hide

- Model-driven tool support: catalogue of strategies
 Feature 1: strategies to Abstract data ; K-anonymity
 - \Box Feature 2: strategies to Minimize data ; α -anonymity
 - □ Feature 3: import data structures, e.g., raw tables
 - □ Feature 4: import data from schema, e.g., data base schema

(2)



 $I(T_1 \cup T_2; \alpha * QI) = H((T_1 \cup T_2) \cap \alpha * QI)$

 $t \in OI \ t \in C_d$

 $H(\alpha * QI) = \sum \sum \alpha_i P(X = t) \log_b(P(X = t))$ (3)



3. Strategy for data-oriented model PDP4E



Overview of data-oriented strategies Application of the strategy \rightarrow

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Project Explorer 🛛 📄 🛱 🏹 🕴 🗖 🗖	PrivacyDesignC-ITS.di	🤿 PrivacyDesignSmartG	rid_5.di 🧷 🥠 PrivacyData_3.di	🥠 PrivacyDesignC-ITS_0.di	CIT	IS_network_frames_1.csv	PrivacyDataC-ITS_1.di	×	
😝 > PrivacyDesignC-ITS [pdp4e master]		• cITSFrameID	• vehicleID	• time	•	latitude	• longitude	• speedValue •	headingValue
CITS_network_frames_1.csv	Class4	fid1	JH4DB1542MS007683	10:41:06		48.02	2.32	35.2	75.31
ProcessOrientedModelStyle.css	Class5	fid2	WVWSB61J71W607153	10:41:07		48.02	2.32	45.2	75.31
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> 🖓 PrivacyDesignC-ITS	Class7	fid4	1NXAE09B1RZ155488	10:41:07		48.02	2.31	55.01	255.31
PrivacyDesignSmartGrid [pdp4e master]	Class8	fid5	WVWSB61J71W607153	10:41:07		48.01	2.32	60.02	75.32
😽 RequirementsSmartGrid [pdp4e master]	Class9	fid6	JH4DB1542MS007683	10:41:08		48.0	2.3	55.8	75.31
	Class10	fid7	3N1BC13E99L480541	📧 K-Anony — 🗆	X	48.02	2.31	55.9	75.31
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«CITSFrame» Class12				cruiseControlEngaged					
«CITSFrame» Class13	🖓 Welcome 🎹 CITSFra	me Table 🔀		speedLimiterEngaged					
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Strategy outcomes ->

🕌 K-Anonymity Outcomes				– 🗆 ×	
K-ANONYMITY OUTCOMES	ElementName	time	latitude	Ionaitude	
	Class4	10:41:06	48.02	2.32	
<-Anonymity target: 2	Class5	10:41:07 48.02		2.32	
K-Anonymity achieved: 1	Class6	10:41:07	48.01	2.31	
	Class7	10:41:07	48.02	2.31	
Property satisfied? false	Class8	10:41:07	48.01	2.32	
	Class9	10:41:08	48.0	2.3	
A concerned data set is highlighted	Class10	10:41:08	48.02	2.31	
	Class11	10:41:08	47.99	2.32	
	Class12	10:41:08	47.98	2.29	
	Class13	10:41:08	47.97	2.3	
	Class14	10:41:09	47.98	2.31	
	Class16	10:41:09	47.98	2.31	
	Class15	10:41:09	47.97	2.32	
	Olasa47	40-44-00	17.07	0.04	
٨	K-Anonymity Outcon	nes			– 🗆 ×
K-AN	ONYMITY OUTCOME	S ElementName	time	latitude	longitude
		Class4	10:41:06	48.02	2.32
K-And	onymity target: 2	Class5	10:41:06	48.02	2.32
K-And	onymity achieved: 2	Class6	10:41:07	48.02	2.31
		Class7	10:41:07	48.02	2.31
Prope	erty satisfied? true	Class8	10:41:07	48.01	2.3
-		Class9	10:41:07	48.01	2.3
		Class10	10:41:08	47.99	2.31
		Class11	10:41:08	47.99	2.31
		Class12	10:41:08	47.97	2.29
		Class13	10:41:08	47.97	2.29
		Class14	10:41:09	47.98	2.31
		Class16	10:41:09	47.98	2.31
1		Class15	10:41:09	47.97	2.31
-		Class1/	10:41:09	47.97	2.31
		Class18	10:41:10	47.96	2.32
		Class19	10:41:10	47.96	2.32
		Class20	10.41.10	47.90	2.32
		CLOSE			



- Goal: capture the data flows and processes under study to analyse conformity w.r.t. privacy precepts
- > A modeling language amenable to:
 - □ Support Data Flow Diagrams (DFD)
 - Incorporate aspects related to privacy and data protection by design

Model-driven tool support: UML Activity-like diagram to model processes & data
 Feature 1: DFD profile: External Entity, Process, Data flow, Data storage, Ports
 Feature 2: Reusability of data-oriented structures (to type Ports)
 Feature 3: Full compatibility with PDP4E-Req models (inherited traceability)
 Feature 4: Leverage GDPR profile







Goal: apply known privacy strategies to improve DFD model

Process-oriented strategies proposed by ENISA, ISO/IEC-27550

5. Apply process-oriented strategy

Control

PDP4E

Enforce

Demonstrate

- Model-driven tool support: catalogue of strategies
 - □ Feature 1: strategies to Control ; Consent pattern
 - □ Feature 2: strategies to Inform ; Data breach notification
 - □ Feature 3: import/export DFD models from Privacy Risk Management (PRM) tool
 - □ Feature 4: dedicated profile to support privacy threat conditions (PRM)





5. Apply process-oriented strategy

1. Select GDPR requirements to be satisfied 2. Develop a data-oriented model 3. Built-in privacy techniques for data-oriented models 4. Develop a process-oriented model 5. Built-in privacy techniques for process-oriented models Designivotok DesignOK Continue the development cycle

Overview of process-oriented strategies

Application of the strategy \rightarrow

runtime-New_PDPbDesign - PrivacyDesignC-ITS/PrivacyDesignC-ITS_0.di - Eclipse Platform

<u>File Edit Navigate Search Papyrus Project Run Window Help</u>



Outcome of the strategy ->



Automotive case study: C-ITS

Personal data detection outcomes ->

Table	Score (s)	Open Data Score
Owner	High	High
Address	High	High
Registration	High	High
Authorized Vehicle	Medium	High
Certificate	Medium	High
Authority	Low	Medium
Key	Low	Medium
Vehicle	Low	High
Frame	Low	Medium
	TableOwnerAddressRegistrationAuthorized VehicleCertificateAuthorityKeyVehicleFrame	TableScore (s)OwnerHighAddressHighRegistrationHighAuthorized VehicleMediumCertificateMediumAuthorityLowKeyLowVehicleLowFrameLow

 TABLE 2. PERSONAL DATA IDENTIFICATION SCORES

Privacy assessment on data **→**



Privacy-aware modelling



Privacy assessment on DFDs→



Summary of achievements

- PDPbD modules released as open-source:
 - Privacy designer:
 - https://git.eclipse.org/c/papyrus/org.eclipse.papyrus-privacydesigner.git/
- PDPbD framework implements the methodology to realize "privacy by design":
 - □ Method to incorporate knowledge from three domains:
 - Systems engineering
 - Privacy and Data Protection
 - Regulations like GDPR and standards like ISO/IEC 27750
 - Tool support for the method via three modules:
 - Personal Data Detection
 - Privacy model-driven designer
 - Code validation

Proof of concept validated via an automotive case study



Acknowledgements



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 787034.

https://www.pdp4e-project.eu/



Methods and Tools for GDPR Compliance through

Privacy and Data

Protection 4 Engineering

For more information, visit: <u>www.pdp4e-project.org</u>

Thank you for your attention

Questions?

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