Pseudonymisation: Some feedback from supervisory authorities

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IPEN Workshop 2021
“Pseudonymous data: processing personal data while mitigating risks”
09.12.2021, online
Introduction & background

- Pseudonymisation played important role in German data protection law before GDPR.

- At yearly Digital Summits of the Federal Government the Data Protection Focus Group published
  - a Whitepaper on pseudonymisation
  - Requirements for the use of pseudonymisation
  - and a draft for a Code of Conduct for Pseudonymisation.
Common mistakes

- **Homonym error**

- **Numbered pseudonyms**
  Conclusions about individuals can be derived from the order of sequence

- **Hash values of identification data with low variance**
  Rainbow table attacks are possible
Notes from practice

• More difficult than one would expect:
  **Identify identification data**
  - Which data can be used for an identification?
  - How to separate (possible) id data from pure content

• Sometimes a helpful approach:
  **More than one pseudonym per person**
  Mitigating risks by separating use cases

• Interesting business field:
  **Pseudonymisation As A Service**