

# **Pseudonymisation: Some feedback from supervisory authorities**

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“Pseudonymous data:  
processing personal data  
while mitigating risks”  
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# *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.



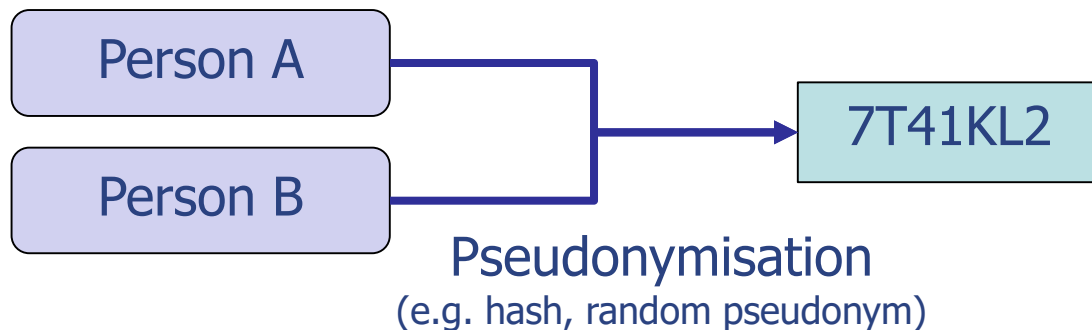
Rolf Schwartmann / Steffen Weiß (Ed.)

## Requirements for the use of pseudonymisation solutions in compliance with data protection regulations

A working paper of the Data Protection Focus Group of the Platform Security, Protection and Trust for Society and Business at the Digital Summit 2018

## *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**