



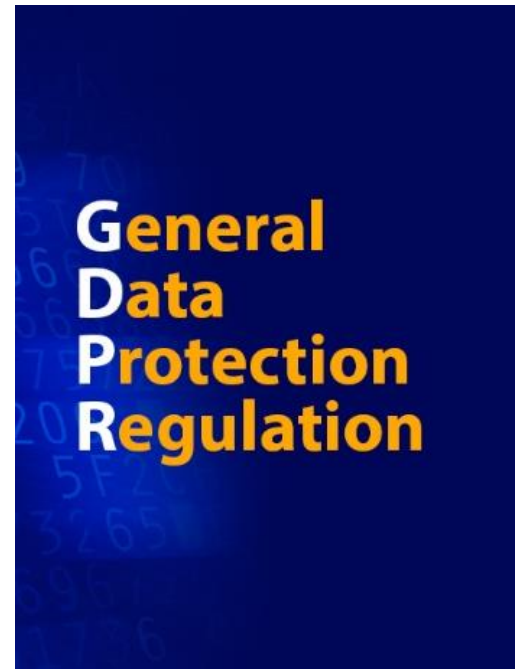
GDPR Privacy Implications for the Internet of Things

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4th December 2018

GDPR

On May 25th of 2018 all EU countries began to apply the General Data Protection Regulation (GDPR). GDPR aims to protect and regulate data privacy and applies to any organization that holds or processes data on EU citizens, regardless of where it is headquartered. The penalties for non-compliance can be as high as 4% of global revenue for companies. As a result, compliance with GDPR is a must for companies who deal with users data.





General Data Protection Regulation

Concepts and Definitions

Data Subject

Data Controller

Data Processor





General Data Protection Regulation

Principles

GDPR Principles (Article 5)



Accuracy



Security



Minimisation



Purpose Limitation



Retention Periods



Fair, Lawful and Transparent Processing



Accountability



General Data Protection Regulation

Rights and Obligations of
Data Subjects, Controllers and Processors

GDPR Rights and Obligations of Data Subjects, Controllers and Processors



Data Subjects

- Right to Access
 - Right to be Forgotten
 - Right to withdraw Consent
 - Right to Data Portability
- Art. 12 to 22



Data Processors and Controllers

- Privacy by Design and by Default
 - Breach Reporting and Notification
 - Appoint a DPO
 - Cooperate with DPAs
- Art. 24 to 34

The background of the top half of the slide is dark blue. It features a large, semi-transparent blue padlock in the center. Surrounding the padlock are twelve yellow stars, similar to the European Union flag. The background is also filled with faint, light blue hexadecimal characters (0-9 and A-F) scattered across the surface.

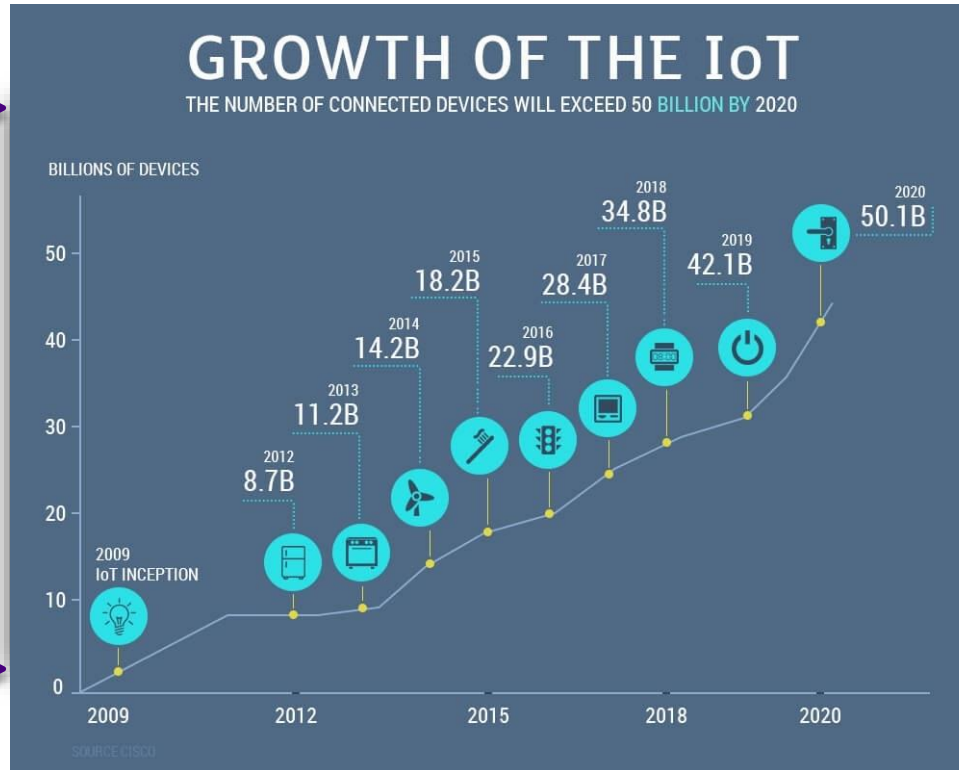
General Data Protection Regulation

Challenges in IoT environments

GDPR Challenges in IoT environments

Consent

Data
Minimisation



Transparent
Processing and
Right to be
Forgotten

Data Breach
Reporting

Privacy Implications

Privacy & GDPR

“Someone’s right to keep their personal matters and relationships secret.”

Cambridge Dictionary

- GDPR article 32: *controllers* and *processors* **must** implement effective privacy preserving mechanisms
- Anonymization vs Pseudo-anonymization
- PII: Personal Identifiable Information
- ISO 27001?



Privacy Concerns – Smart Home Use Case

- Devices:
 - > TV, bed, home pod, lights, fridge, toothbrush, smart readers
- Data ownership?
 - > “Terms & Conditions Agreement”
- Potential Threats:
 - > Selling data to 3rd party
 - > More data it is actually collected
 - > Data weakly protected
 - > Individuals profiling



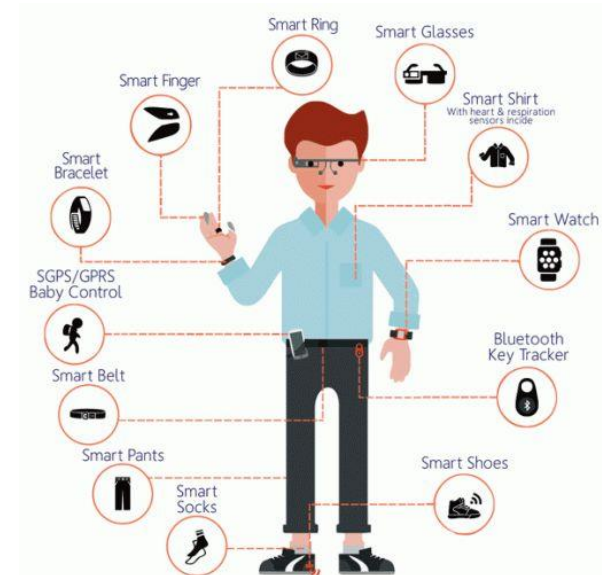
Business

Vizio agrees to pay \$2.2 million to settle FTC's television-spying case



Privacy Concerns – Healthcare Use Case

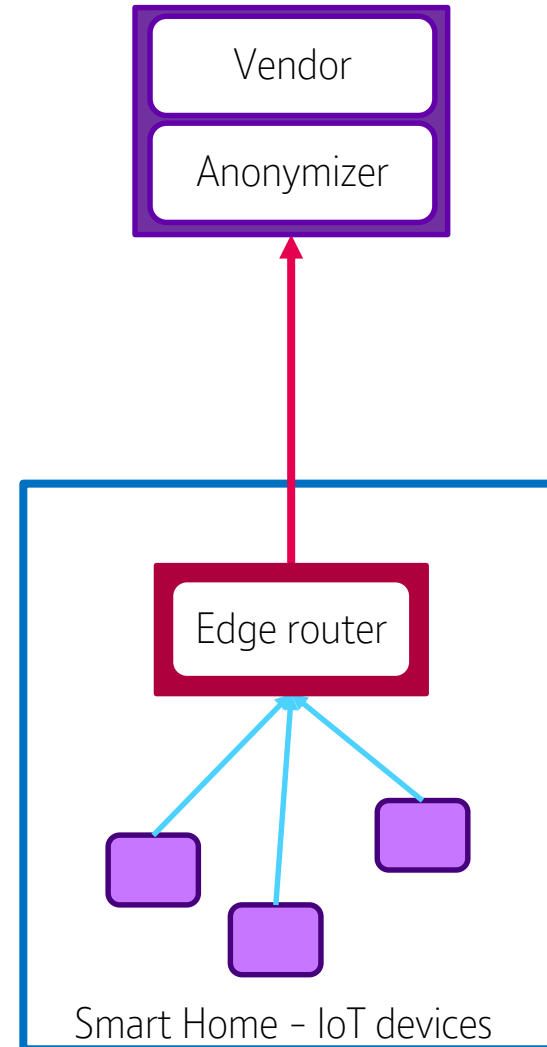
- Wearable devices
- Users awareness?
- Marketing purposes
- Very dangerous scenario!
 - > Why?



Mitigation Approaches

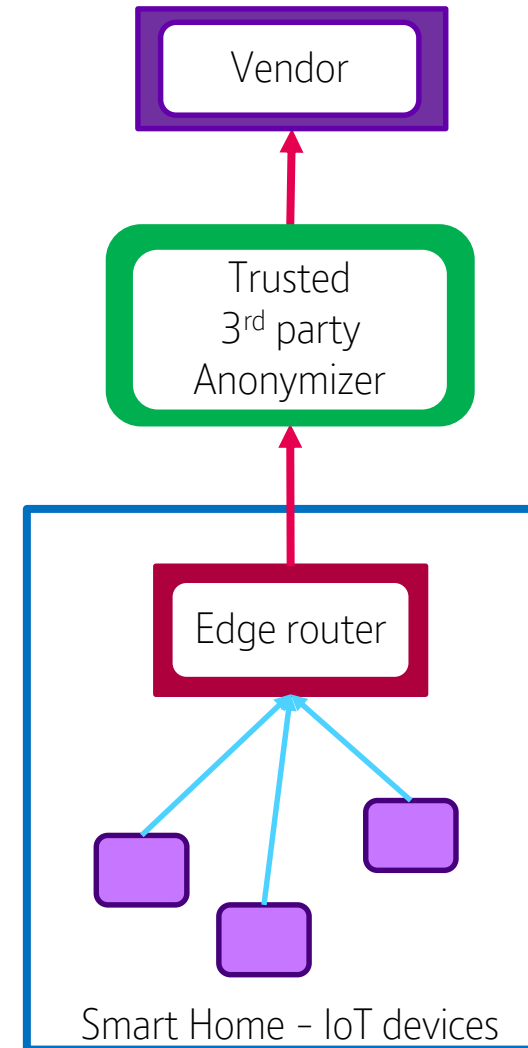
Mitigation Approach 1

- Based on the user's trust with regards to IoT vendor:
 - > Trust in vendor: **high**
 - > Implementation difficulty: **easy**
 - > Risk: **high**



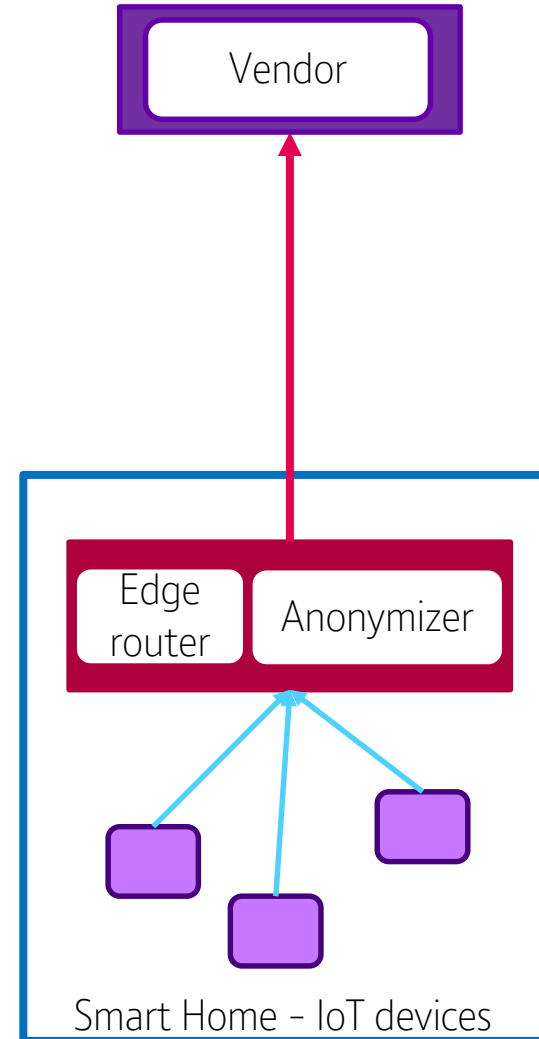
Mitigation Approach 2

- “Anonymization As a Service” (AnaaS)
 - > Trust in vendor: **low**
 - > Trust in 3rd party service: **high**
 - > Implementation difficulty: **medium**
 - > Risk: **low** in vendor, **medium/high** in 3rd party service



Mitigation Approach 3

- Anonymization is applied locally:
 - > Trust in vendor & 3rd party service: **very low**
 - > Implementation difficulty: **hard**
 - > Risk: **very low**





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Thank You!

- *Thank you to the European Union, British Telecom and my distinguished supervisors for giving us this opportunity.*
- *This project has received funding from the European Union's Horizon 2020 research and innovation programme under the Marie Skłodowska-Curie grant agreement No. 675320.*
- *This work reflects only the author's view and the Research Executive Agency is not responsible for any use that may be made of the information it contains.*