



Covid-19 – the perfect Privacy by Design case  
Trustworthy Anonymity as business enabler

**CitizenKey**

Fast roll-out, then upgrade

Stephan Engberg, CitizenKey

**Many new complex regulation packages**  
addressing different objectives with apparently inconsistent means  
create very complicated operational challenges



The word cloud contains the following terms: PSD2 (red), GDPR (purple), CyberSecurity/NIS (dark purple), Anti Trust/Big Tech (red), ePrivacy (dark purple), eIDAS (purple), eMoney (red), Human Rights (red), Klima (red), and AML (red).

The result:

Often leads to ends justifying destructive means with negative externalities that exceed the benefits

# GDPR article 25

Data protection by design and by default

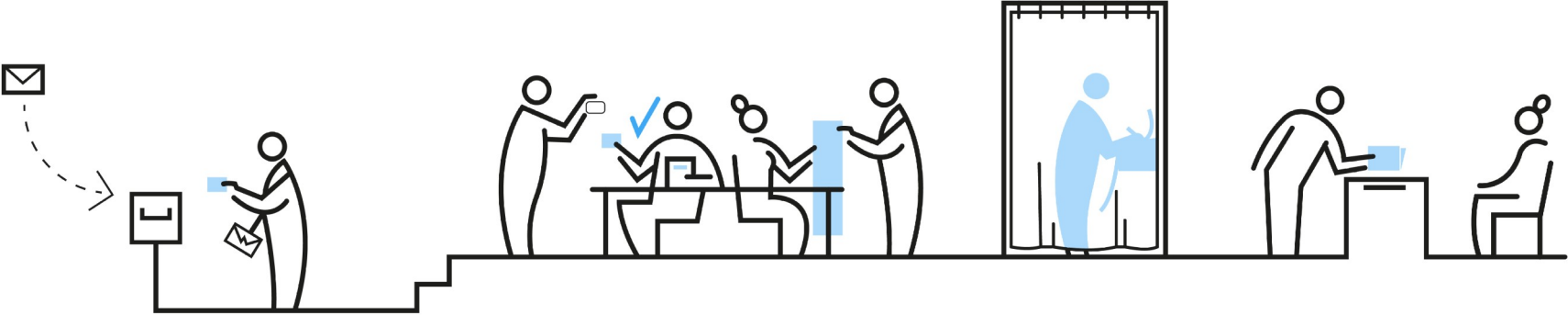
1. **Taking into account the state of the art**, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing, **the controller shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures, such as pseudonymisation, which are designed to implement data-protection principles, such as data minimisation**, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of this Regulation and protect the rights of data subjects.

2. **The controller shall implement appropriate technical and organisational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed. That obligation applies to the amount of personal data collected**, the extent of their processing, the period of their storage and their accessibility. In particular, such measures shall ensure that by default personal data are not made accessible without the individual's intervention to an indefinite number of natural persons.

**Data minimization according to state-of-the-art means:**

**If you can solve an otherwise legitimate need for data without collecting personal data, you are not allowed to collect personal data !**

Elections / Paper ballots – Trustworthy Anonymity in real life



# Definitions

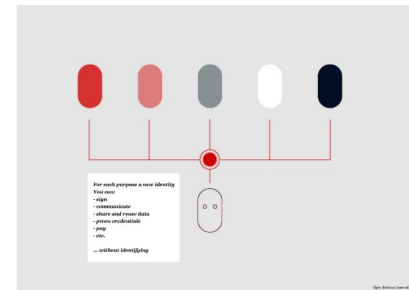
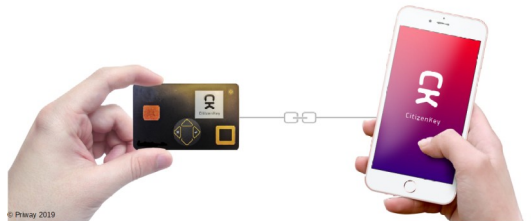
CitizenKey	eIDAS	GDPR
Not Trustworthy Identified in infrastructure Trusted (e.g identified to Appl) Hybrid (mixed, with delegation)	Digital Signature	Data protection by Design Pseudonymized Anonymized
Identified	Identification	Identified
Not Identified	Identification	Identifiable
Security by Design* Trustworthy Secure	eID Pseudonymous Signature **)	?? Undefined grey zone "Not identified but identifiable"
Accountable	Identification	Identifiable
Not Accountable	Identification	Not Identifiable
Privacy by Design* Trustworthy Anonymous	eID Pseudonymous Signature **) or Not defined under eIDAS/eID	Anonymous, not covered by GDPR

\* ) Terminology not defined in GDPR

\*\* ) Defined by member states in eIDAS

# CitizenKey Five-factor Security

Factor	Basic	Extended
1. Something you are	Biometrics	
2. Something you have	Hardware	
3. Something you know	Password	
4. Purpose-specific keys & identifiers	Zero reuse of keys	Redefines the three first factors
5. Contextual isolation & Customization	Trustworthy spaces	Multi-party Security resolution & data sharing without collecting personal data



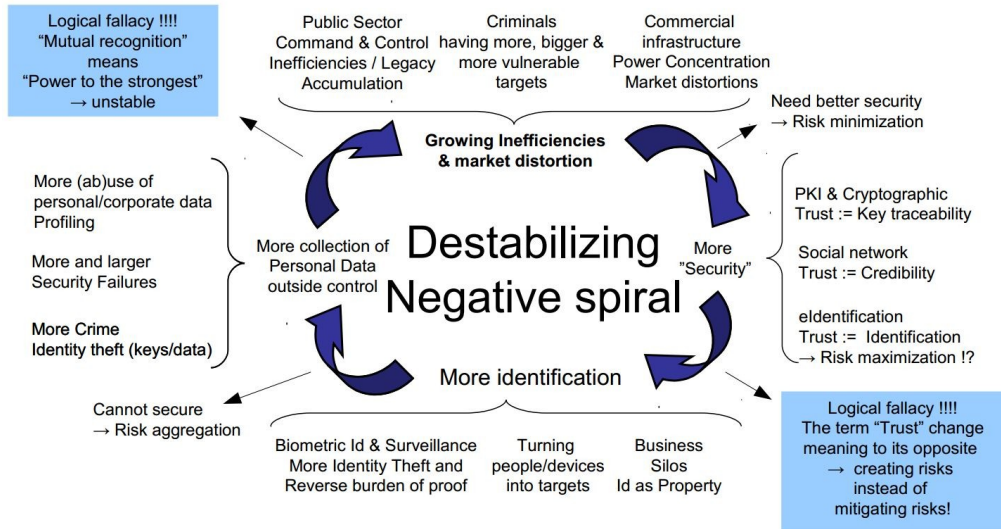
# 2002: IST Living with Security

”We face an existential choice”

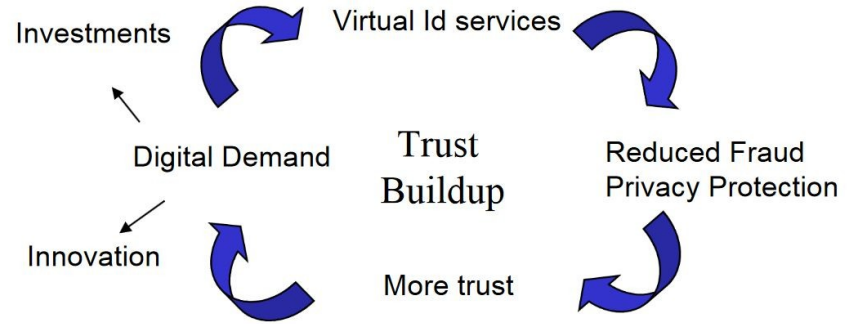
Negative Spiral

Positive Spiral

Identification destroy trust !



**Positive Trust Circle**



Eliminate Single Points of Trust Failure

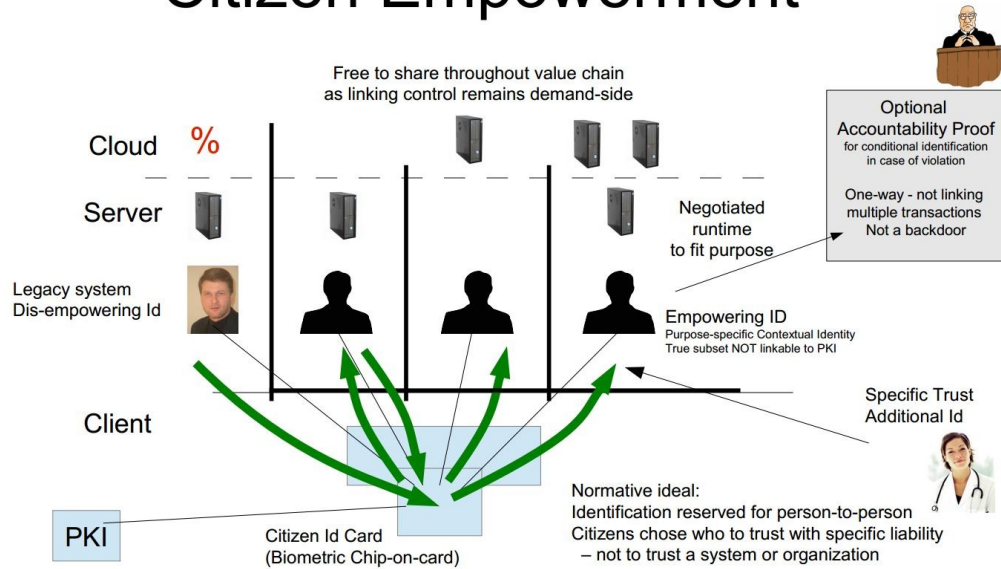
Citizen is a product and object for control

Empowered Citizens are main change agents

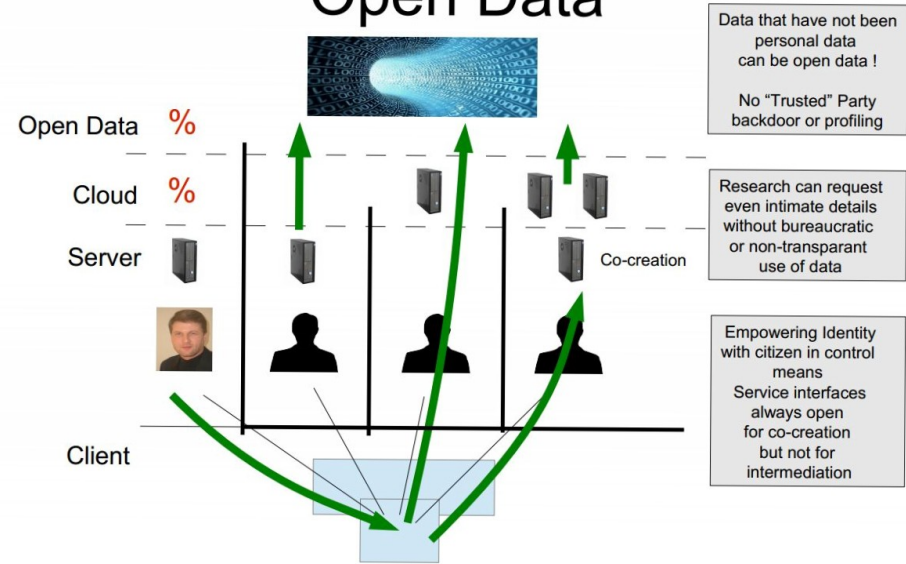
# 2012: EU Digital Agenda

## BigData → SmallData

### Citizen Empowerment



### Open Data



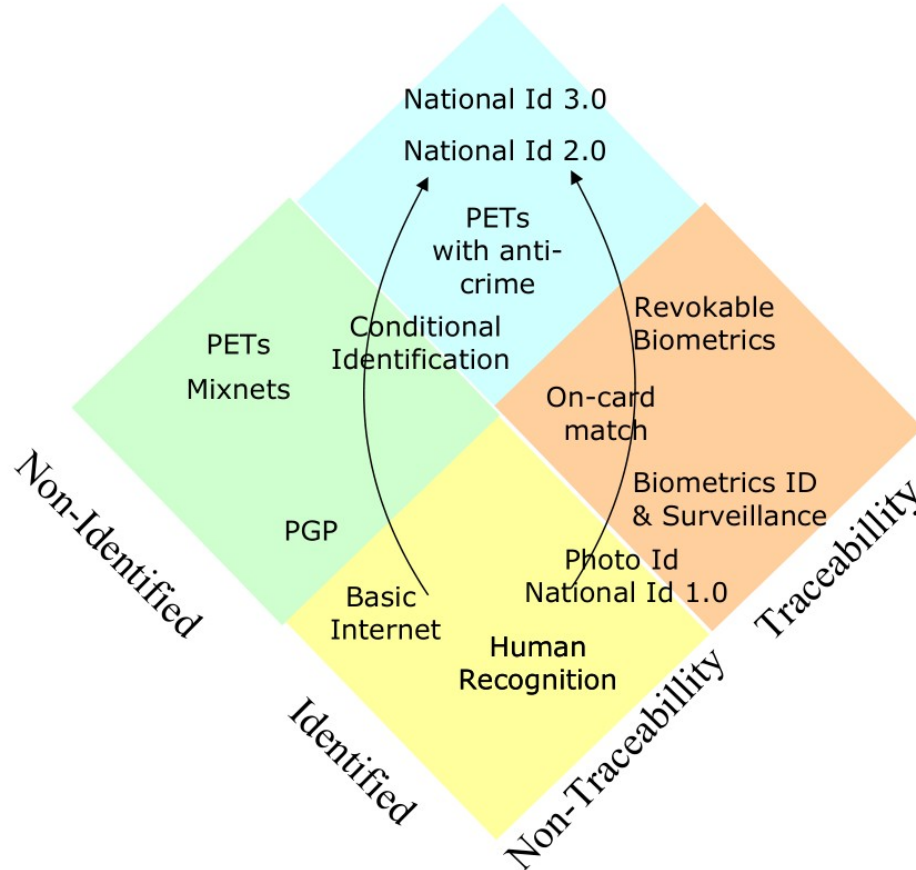
Key control NOT in Smartphones – separate dedicated devices



# Priway Identity Model

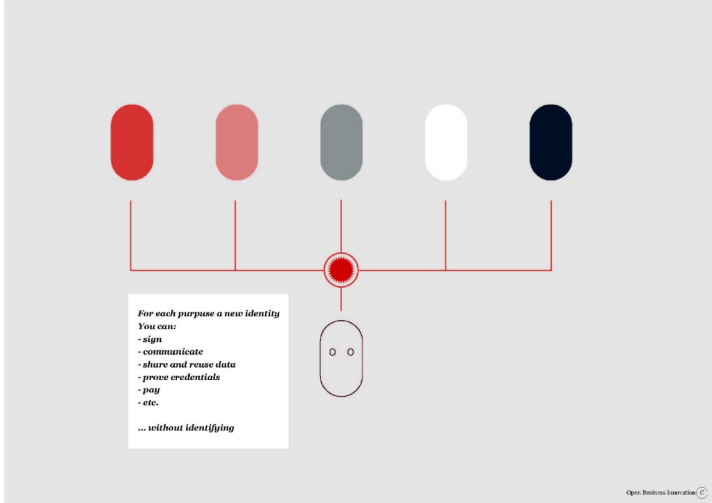
## Roadmap to PETs & Biometrics

Security for  
Individual  
& System



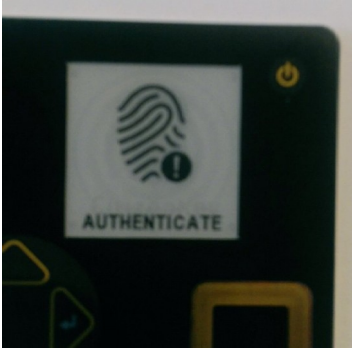
Security against  
Citizen

# Trustworthy COVID-19 data sharing

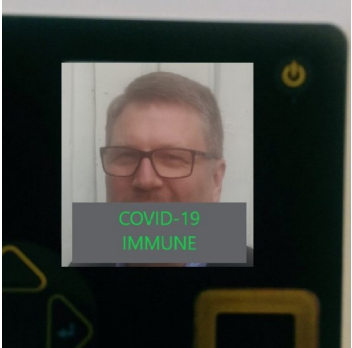


Lab issue  
Test results

Trustworthy Identity



On-card visual status



Digital integration



Enabled  
Society  
Service

# Untested assumptions prevent problem solution !

Council of Europe

DIGITAL SOLUTIONS TO FIGHT COVID-19 (Oct 12)

”Regardless of the type of test used (viral or antibody) mandatory testing is a highly invasive measure as it involves the use of biometric samples to detect the health status of individuals.”

<https://www.coe.int/en/web/portal/-/digital-solutions-to-fight-covid-19-shortcomings-protecting-privacy-and-personal-data>



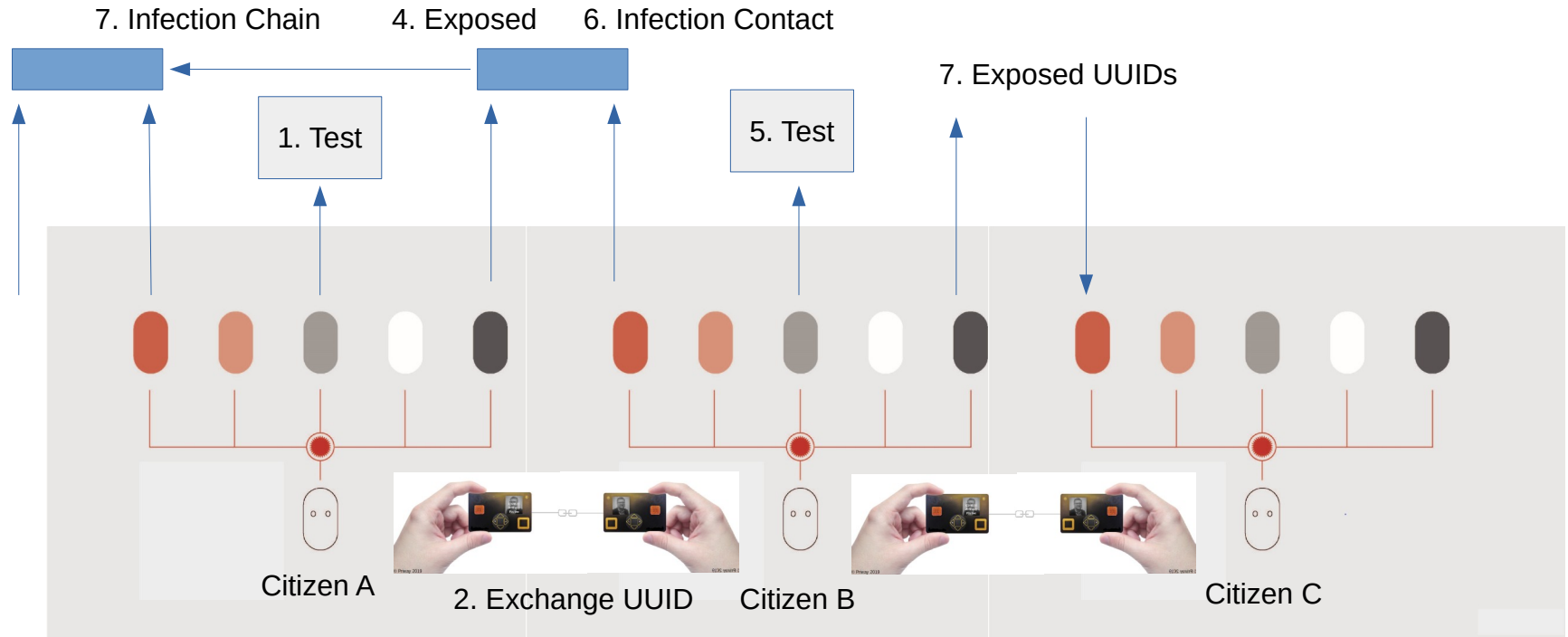
# Covid-19

## Trustworthy Anonymity as business enabler

- Before Covid-19 we were trying to bring security to Healthcare – research, telemedicine, Trustworthy AI, personal medicine, wearables etc.
- With pandemics we need to bring sensitive health data to security !

	Identified	Trustworthy Anonymous
Data collection	Any testing is collecting DNA, proteins etc.	Main sensitivity problem resolved More testing, more test providers
Data usage	Weak identity → Fraud  All checkpoints leak personal data -> resistance & breach. GDPR restrictions	Strong identity → No personal data at Checkpoints – Trustworthy sharing, secure, non-restrictive compliance
Interoperability	Locked to identity model, typical national health infrastructure focus on treatment.	Open model - N:M reuse Citizen “carry” data and proof Citizen can enable secondary use

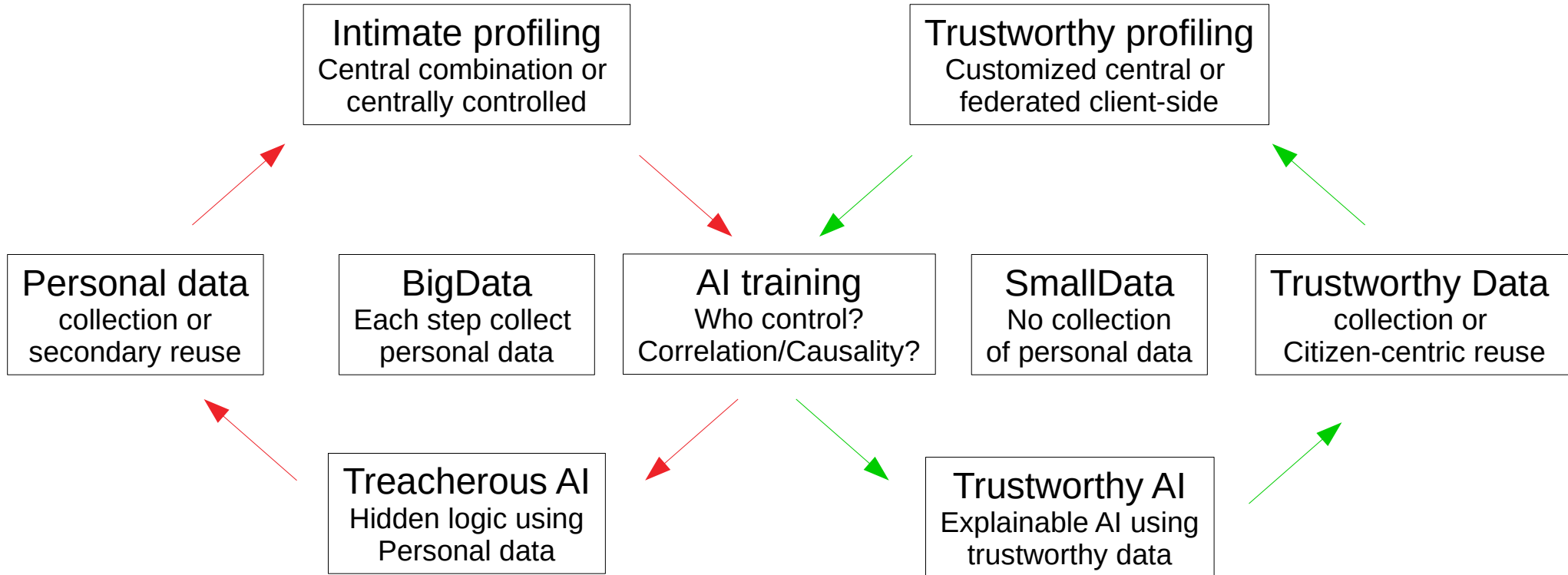
# Trustworthy Anonym Covid-19



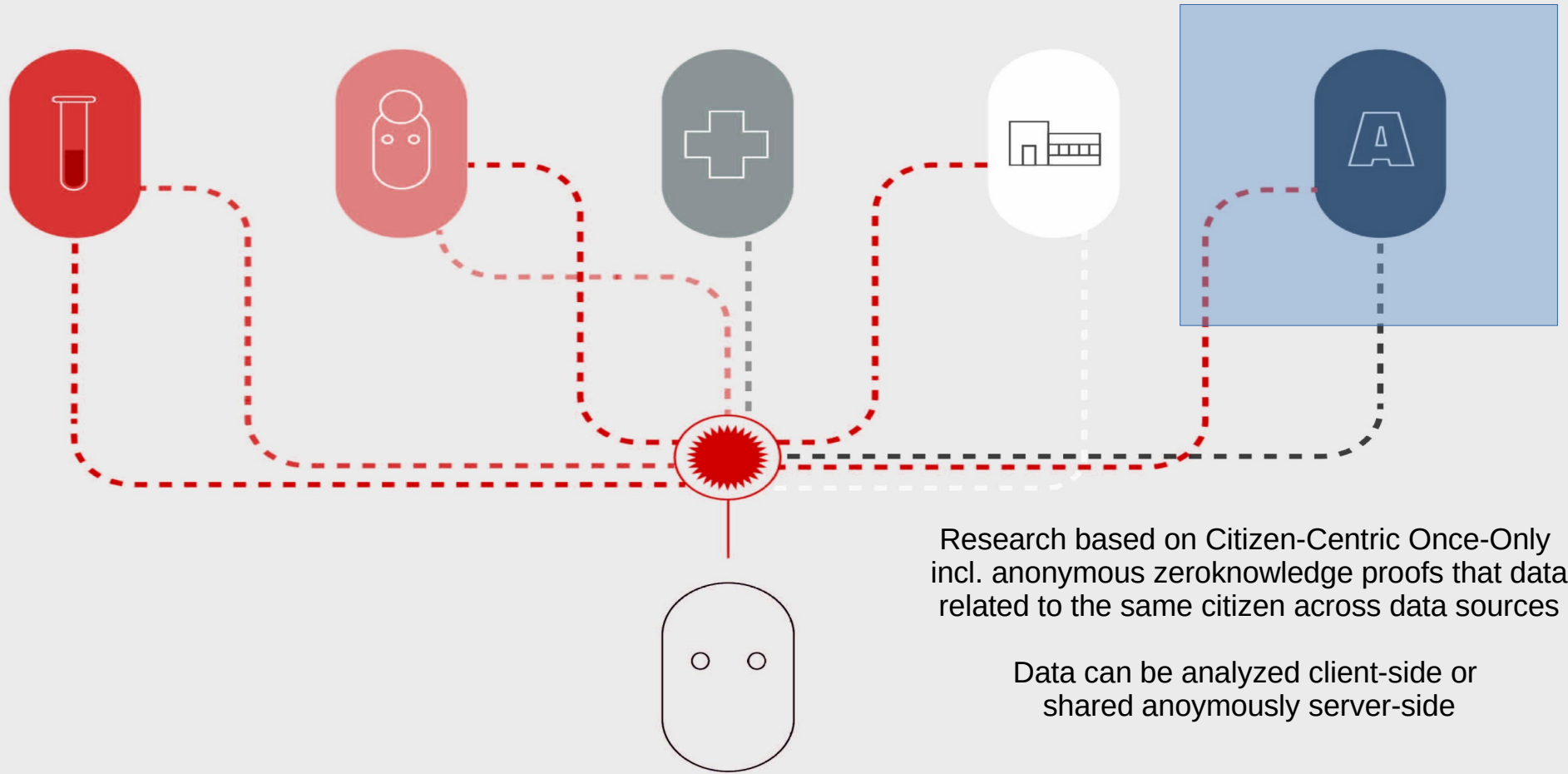
3. Exchange Health Status i local groups  
Mitgate exposure realtime

# BigData AI vs. SmallData AI

## Negative vs. positive circle



# SmallData Research Basic



Research based on Citizen-Centric Once-Only  
incl. anonymous zeroknowledge proofs that data  
related to the same citizen across data sources

Data can be analyzed client-side or  
shared anonymously server-side



# What did we miss in the first wave?

Issue	Consequence
Trustworthy Anonymous Test	Many resist testing, all testdata vulnerable
Activate the wireless space	Distance resolution pre-infection – e.g. hospitals, Care
Anonymous Contact Points	Privacy by Design support for remembering contacts between strangers (Events, locations etc.)
Proximity testing	Focus was on Central vs. Decentral (smartphone) → BigTech in control Overfocus on distance measurement and time. Better → Dedicated devices so no access to keys
Distributed Infection trace	The focus on Google/Apple decentralized meant we did not enable citizens self-tracing (manual trace on top if needed – not ONLY). E.g. scanning Personal Social network much faster  Anonymous Contact Points help Citizens self-trace - scalable
Full Chain support	Need to lean the full chain
SmallData Research	Trustworthy datasharing enable learning without negative spiral

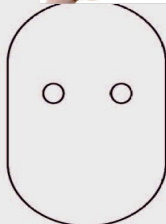
Testing

Treatment  
Doctor

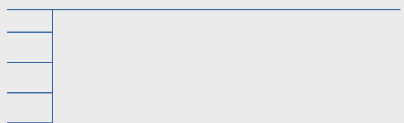
Diagnosis  
(recruiting clinical trials)

Effects / Sideeffects  
(clinical databases)

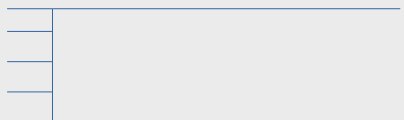
Treatment  
Feedback Loop



Client Apps  
(Intra-device sandboxing)



IOT devices / telemedicine  
(LAN proxy gateway)



IOT devices  
(encoded wireless comm)



# EU Digital Strategy

19. februar 2020

An open, democratic and sustainable society: **A trustworthy environment in which citizens are empowered in how they act and interact, and of the data they provide both online and offline.** A European way to digital transformation which enhances our democratic values, respects our fundamental rights, and contributes to a sustainable, climate-neutral and resource-efficient economy.

The **potential of Article 20 of the GDPR to enable novel data flows and foster competition** is recognised in reports for the Commission and Member State governments, not limited to the EU. Yet, as a result of its design to enable switching of service providers **rather than enabling data reuse in digital ecosystems the right has practical limitations.**

These pools may be organised in a centralised or a **distributed way**

In the latter case **the data are not moved to a central place in order to analyse them together** with other data assets. **The analytical tools come to the data, not the other way around. This makes it easier to keep the data secure and to ensure control over who accesses what data for what purposes.**

Secure and universally usable **digital identities are also crucial to enabling individuals' access to and control over their data.**

# Trustworthy

Strategic Advisory Board  
EU FP7 Security Research Roadmapping

Trustworthy computing: synonymous with "secure and dependable computing."

**Dependability:** is the ability to avoid failures that are more frequent or more severe than is acceptable.

**Dependence:** the dependence of system A on system B is the extent to which system A's dependability and security is (or would be) affected by that of System B.

**Thus system A:**

- **is totally independent of System B if it cannot be affected in any way by System B and its failures** - as well as
- is totally dependent on System B if:
  - i. any failure of B causes A to fail, and
  - ii. A has no other failures.

Trust: accepted dependence.

Trustworthy Computing

involves absence of dependence  
so trust is not even relevant

"Non-interdependence"

**"Perimeter security is failing - we have to move to security paradigms based on Security by Design."**

# Action points

We missed the first wave for the same reasons Europe has been failing in digital.  
GDPR is not about “data protection” but about empowering citizens.  
eIDAS is not about Digital Identification, but creating legal structure and digital framework

Real test – can citizens get an anonymous test that support operational reopening?  
Providing platform for upgrade to Trustworthy Identity for market and democratic recovery

## CitizenKey Classic

- Trustworthy Anonymity for Covid-19
  - Global non-profit based in Denmark
- Interim model for fast roll-out
- Gradual upgrade to full model

## CitizenKey

- Trustworthy Identity
- Trustworthy Data sharing
- Gradual transformation
- General purpose always customized to context and national jurisdiction/structure



# CitizenKey – trustworthy identity and data sharing

The future of compliance

Citizen First

Citizen First contact:  
<https://CitizenFirst.dk>  
Contact @ CitizenFirst.dk