

Foundation Working Group Session #2

Framework for De-identifying Information for
Disclosure to Third Parties

May 20, 2015

Session Agenda

- Overview of De-Identification
 - Definition
 - Example Techniques and Considerations
- Next Steps

Definition: De-Identified Information

“**De-identified information** is information that cannot be used to identify an individual, either **directly** or **indirectly**. Information is de-identified if it does not identify an individual, and it is not reasonably foreseeable in the circumstances that the information could be used, either alone or with other information, to identify an individual.”

Source: Cavoukian, Ann, Ph.D., and Khaled El Emam, Ph.D. "De-identification Protocols: Essential for Protecting Privacy." 25 June 2014. Web:

https://www.privacybydesign.ca/content/uploads/2014/06/pbd-de-identification_essential.pdf

Examples of De-Identification Techniques

- Anonymization
 - Removal or encryption of personally identifiable information
- Pseudonymization
 - One or more pieces of information are replaced with artificial identifiers
- Aggregation
 - Combination or summarization of records to a level that no individual record can be reasonably identified
- Other techniques
 - Shuffling, number and date variance, masking

Each technique and how it is applied may impact analysis and the risk of re-identification.

Next Steps

- At the next meeting we will have a focused discussion on De-Identification.
- In preparation please prepare and submit the following:
 - Describe a situation where data was de-identified, disclosed and used.
 - What de-identification technique(s) was(were) used?
 - How was each technique used or applied?
 - How difficult was each technique to use or apply?
 - How was de-identified data used or analyzed?
 - What were the limitations on the use or analysis of de-identified data?
 - How and under what conditions was de-identified data disclosed?
 - Lessons learned

Additional Resources

- International Journal of Computer Science Issues, Vol. 10, Issue 4, No 2 - “Protection of Personal Data in Information Systems” July 2013 – Web: <http://ijcsi.org/papers/IJCSI-10-4-2-78-81.pdf>
- Federal Trade Commission (FTC) Report - “Protecting Consumer Privacy in an Era of Rapid Change” Web: <https://www.ftc.gov/sites/default/files/documents/reports/federal-trade-commission-report-protecting-consumer-privacy-era-rapid-change-recommendations/120326privacyreport.pdf>
- National Institute of Standards and Technology – “Guide to Protecting the Confidentiality of Personally Identifiable Information (PII)” Esp: Section 2.2 Examples of PII Data - Web: <http://csrc.nist.gov/publications/nistpubs/800-122/sp800-122.pdf>
- Additional de-identification techniques - http://en.wikipedia.org/wiki/Data_masking