

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



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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.



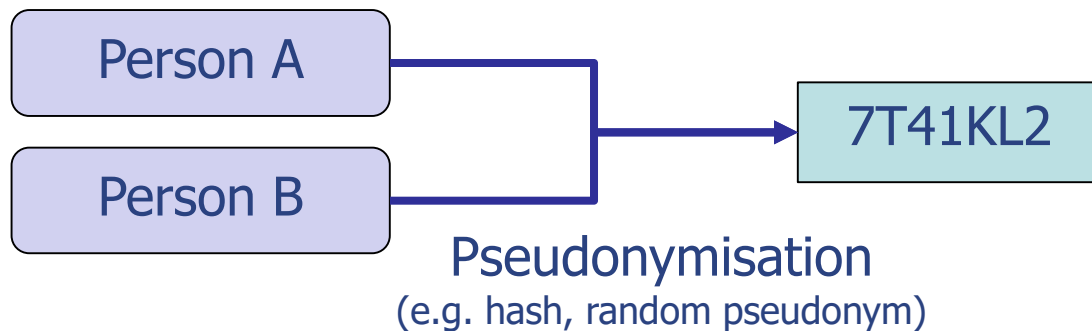
Rolf Schwartmann / Steffen Weiß (Ed.)

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