Webinar on anonymisation and pseudonymisation

Kajsa Svensson, Legal Counsel, Vice-Chancellor’s Office
dataskydd@slu.se

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The purpose of the GDPR

Protect individuals' fundamental rights and freedoms, praticularly their right to protection of their personal data.

In order to protect individuals, the GDPR states certain ***rights*** and ***obligations***.

- For example, the data subject has the ***right*** to be given information when their personal data is processed and SLU is ***obligated*** to give that information.

GDPR (General Data Protection Regulation)

The GDPR applies to the ***processing*** of ***personal data***, wholly or partly:

- by automated means;
- by other than automated means if the personal data form or are intended to form part of a filing system.

What are personal data?

Insurance number	Blood type	X-ray	Name
Union membership	Account number	Ethnicity	Address
Company number	School photo	Political opinion	DNA
Sexual orientation	Relationship	IP address	
Religious belief	Coordinates	Registration number (vehicle)	

Personal data are any information that refers to an identified or identifiable natural person.

Different types of information

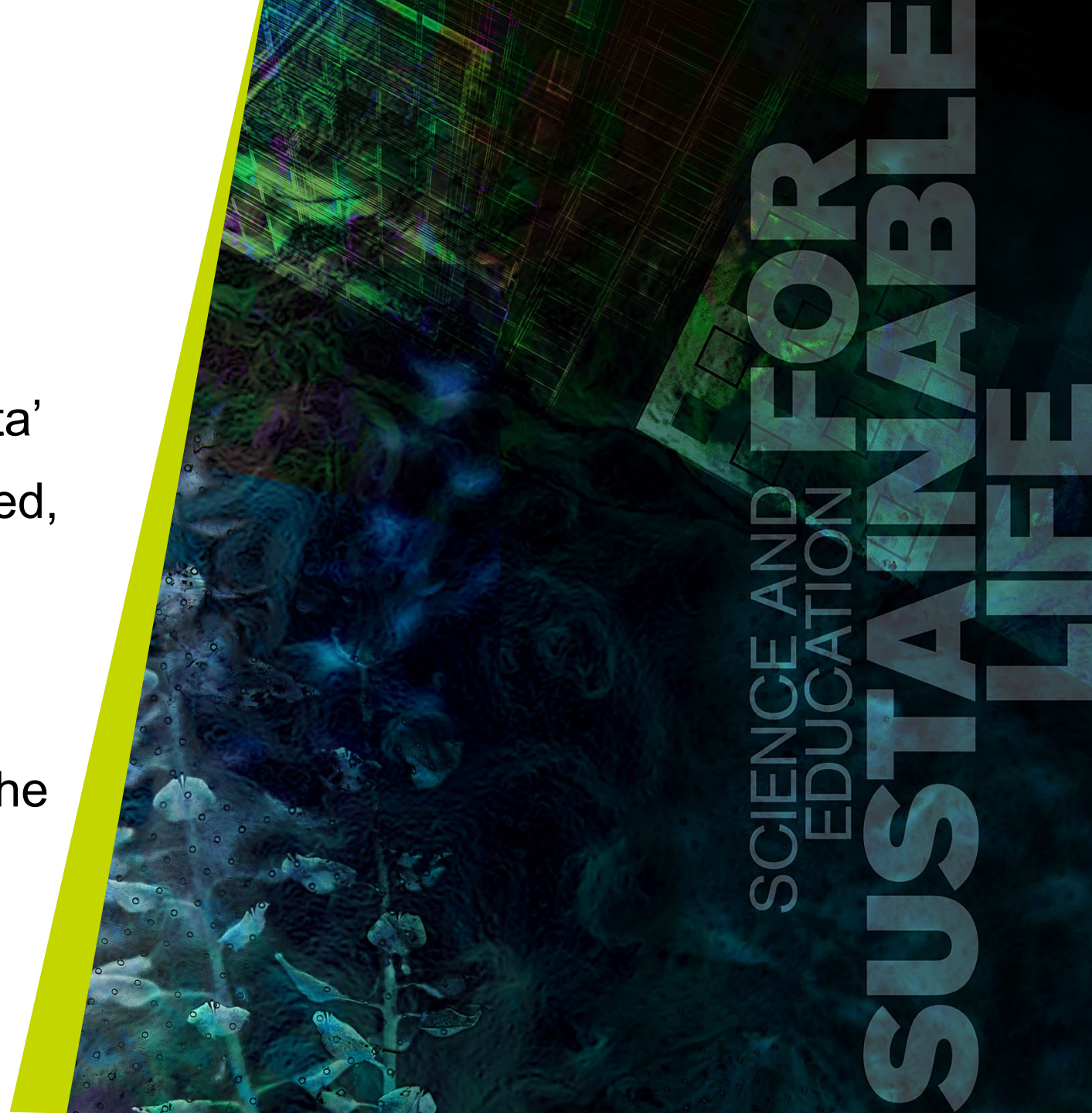
- Clearly personal data (direct identifier)
- Not clearly personal data (indirect identifier)
- Pseudonymised personal data

} Personal data = covered by the GDPR

- Anonymised information – information that does not refer to an identified or identifiable natural person.

Some common misconceptions

- ‘I am not processing personal data’
- ‘If personal names are not included, the dataset is anonymous’
- ‘Anonymisation of data is always possible and is permanent’
- ‘Anonymisation always reduces the probability of re-identification of a dataset to zero’



When does personal data cease to be personal data?

- To be anonymised, all possibilities of identification need to be removed.
  - No direct identifiers
  - No indirect identifiers (allowing re-identification)
  - No code key

Reminder: Other than the GDPR, we also have to consider the Archives Act and the required document retention period. For example, lists containing code keys need to be retained for five years before they can be disposed of.

De-identification techniques

- Anonymisation = to securely delete all original information to prevent any reversing of the ‘anonymisation process’
- Pseudonymisation = to replace any information which could be used to identify an individual with a pseudonym or a value which does not allow the individual to be directly identified.
- Randomisation, masking, obfuscation = to alter, modify or disturb sensitive data
- Generalisation = to cluster specific (sensitive) information
- Aggregation = data mining process popular in statistics

Re-identification or de-anonymisation = reversing the process

Examples

Example 1

Personal data have been collected within a research project. The names and contact information of the participants have been replaced with codes. The list showing which participant received which code is kept seperate from the document containing the answers.

What de-identification technique has been used?

Answer: Pseudonymisation is the de-identification technique that has been used. Re-identification is possible due to the codes and the codes need to be retained for five years before they can be disposed of according to the Archives Act.

Example 2

Researchers interview participants. The interviews are recorded and then transcribed. Personal data are being processed but are not necessary for publication. What de-identification technique, anonymisation or pseudonymisation, can be used?

Answer: Pseudonymisation is possible.

Example 3

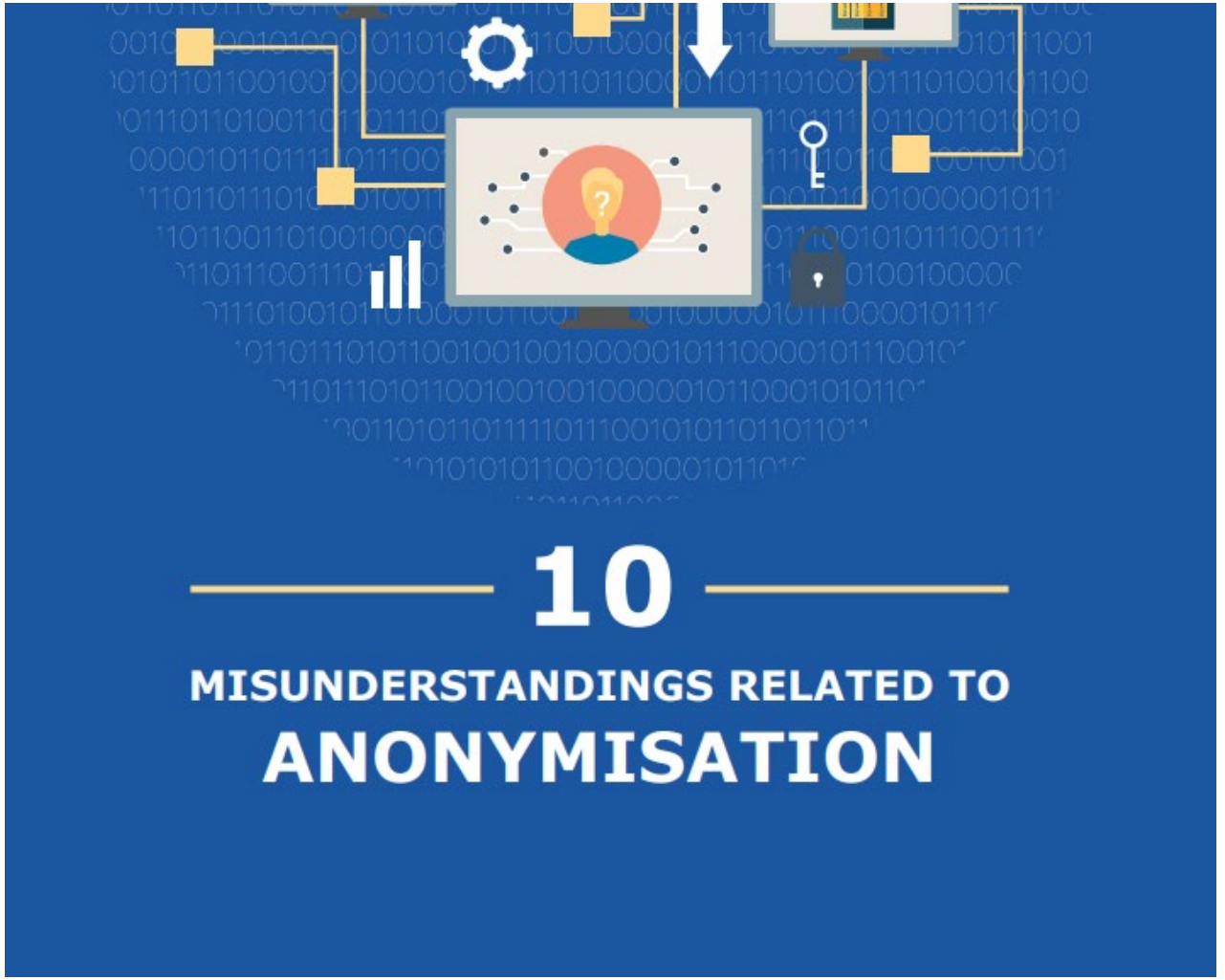
A reasearch project is being conducted in which an interview study has been done. The participants have received information about the research and agreed to participate. The information states that the participants will be anonymous. The interview consists of an online form where some of the questions are free-text answers.

Are the participants anonymous?

Answer: Probably not. If IP numbers are collected, personal data are being processed. There is also a risk the free-text answers will contain personal data.

Summary

1. Will personal data be processed? Or is there a risk of it?
    1. Remember any obligations, e.g. what information the data subject has a right to receive. You can find templates for this on the data protection pages.
    2. Register the research project in the article 30 register if personal data are processed.
2. Verify what personal data are necessary for the research.
3. Can a de-identification technique be used?



If you want to read 10 misunderstandings related to anonymisation,

either open it via the hyperlink or search for the title.

Thank you for your attention

Contact information

Kajsa Svensson, Legal Counsel
Kajsa.p.svensson@slu.se

For questions on GDPR/data protection,
please e-mail dataskydd@slu.se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