

A Generic Data Model for Implementing Right of Access Requests

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Agenda

- Article 15: Right of Access
- Initiation
- Authentication
- Data Model
- Data Request Model
- Article 15 as a Service

Article 15: Right of Access

- Processing purpose
- Categories of personal data
- Recipients of data
- Timeframe
- Source of data
- Existence of automated decision-making
- Safeguards for non-EU data transfers

Article 15: Right of Access

**GDPiRated – Stealing Personal Information On-
and Offline**

Matteo Cagnazzo¹, Thorsten Holz² and Norbert Pohlmann¹

GDPArrrrrr: Using Privacy Laws to Steal Identities

James Pavur*
*DPhil Researcher
Oxford University*

Casey Knerr
*Security Consultant
Dionach LTD*

**GDPR: When the Right to Access Personal Data
Becomes a Threat**

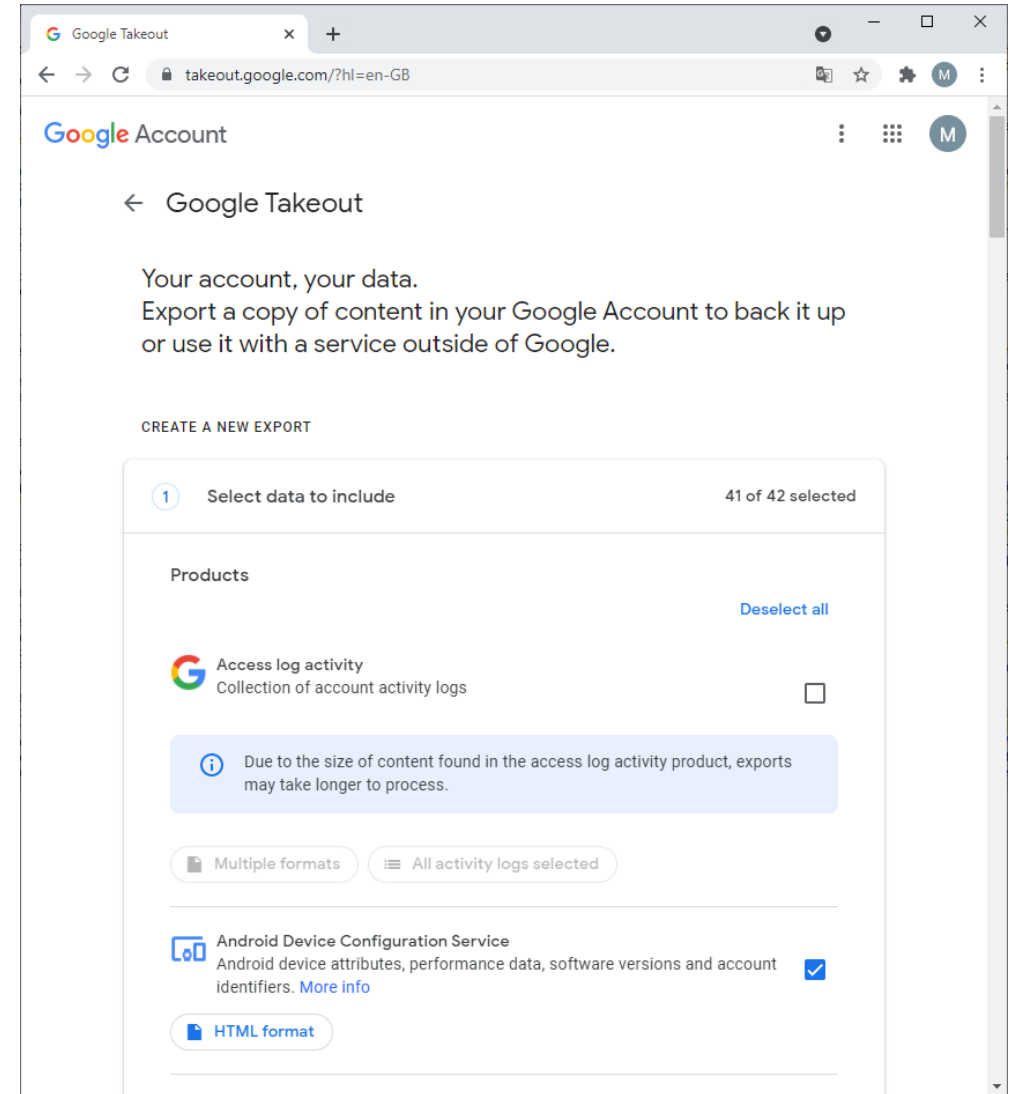
Luca Bufalieri, Massimo La Morgia, Alessandro Mei, Julinda Stefa
Department of Computer Science, Sapienza University of Rome, Italy

**Dude, where's my data? The GDPR
in practice, from a consumer's
point of view**

Hanne Sørum and Wanda Presthus
*School of Economics, Innovation, and Technology, Kristiania University College,
Oslo, Norway*

Initiation

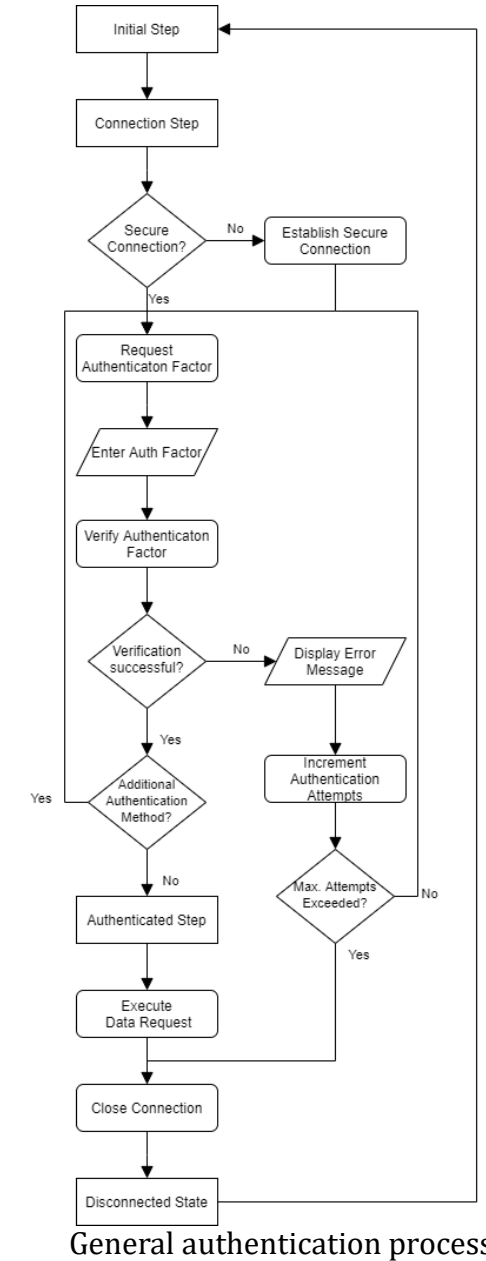
- Goals:
 - Increase accessibility
 - Expected context
 - Minimise input
- Deployment options:
 - Standalone app
 - Web app
 - API
- Placement:
 - Direct navigation
 - Privacy section
 - User settings



Data takeout option of Google account

Authentication

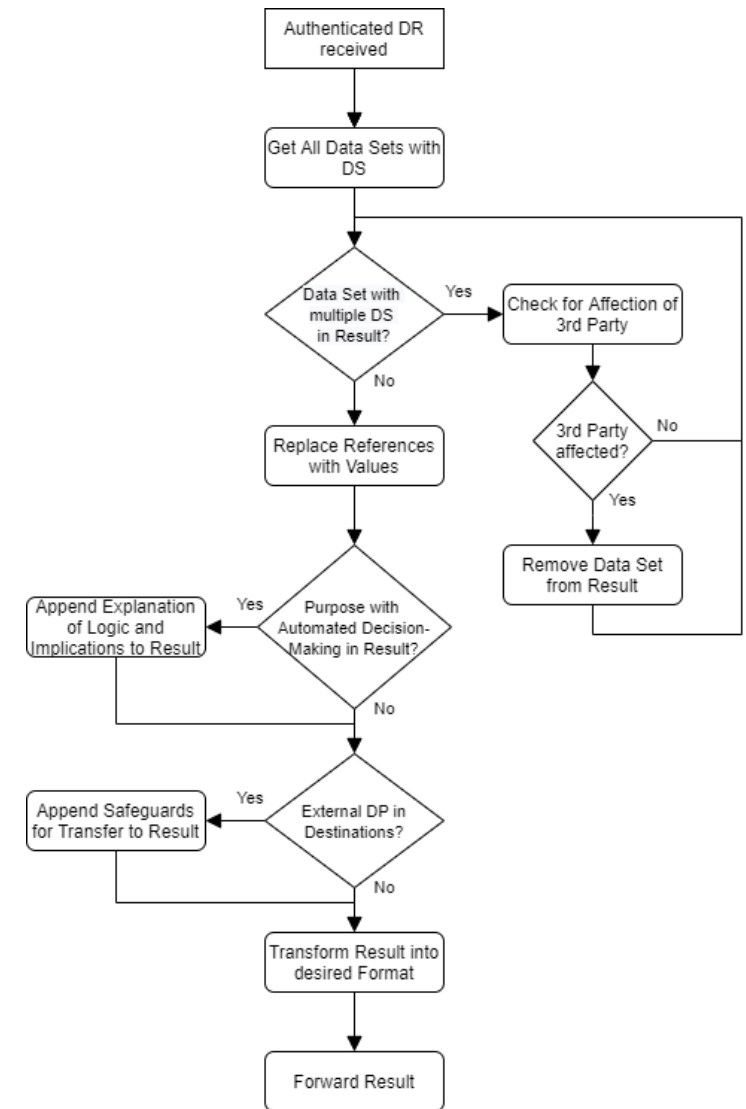
- Goals:
 - Increase security
 - Automate authentication
- Multifactor authentication
- Authentication methods:
 - Challenge response
 - One-time passwords
 - RFID
 - Biometrics
 - Identity Provider



General authentication process

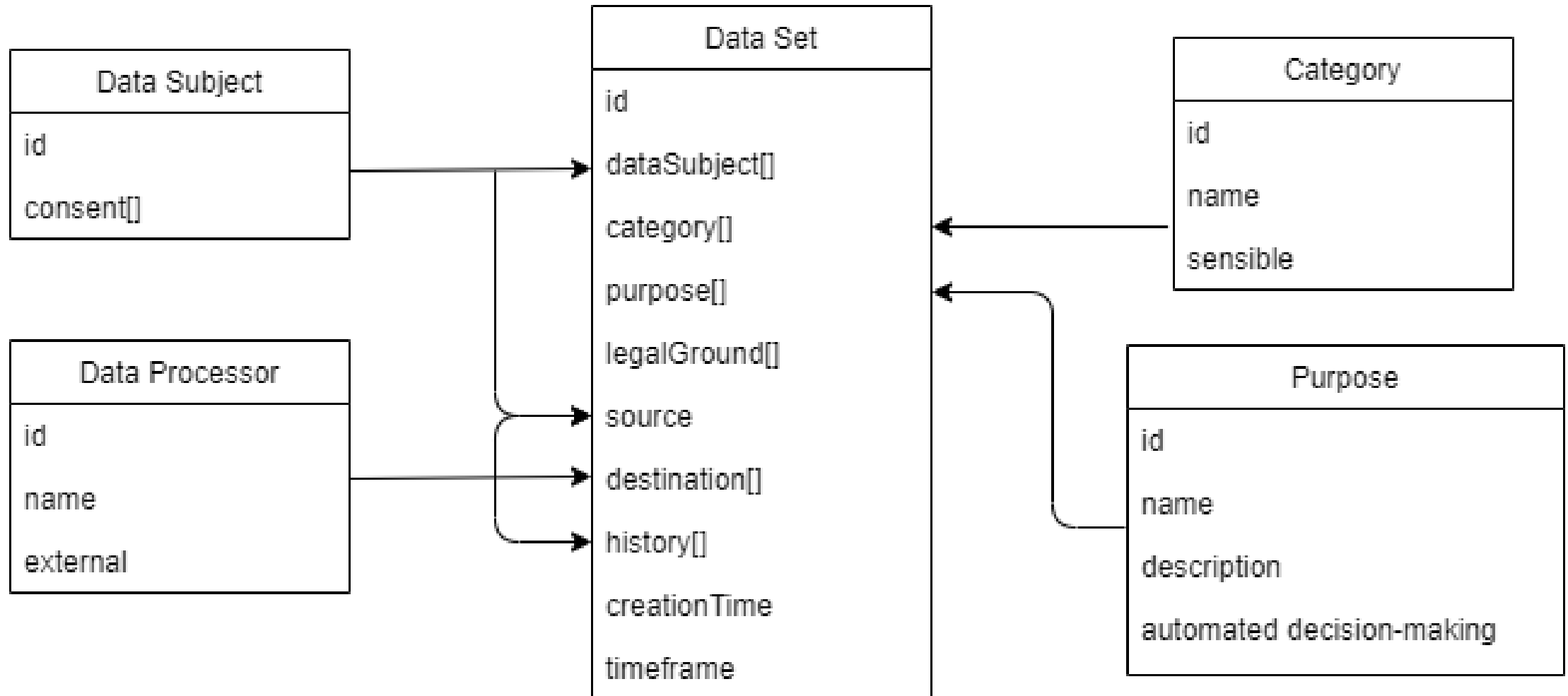
Data Model

- Goals:
 - Increase comprehensibility
 - Data minimisation
 - Support multiple formats
- Complete data trail
- GDPR compliance
 - Article 20: Right to Data Portability
 - 3rd party affection
 - Automated decision-making
 - External data transfers



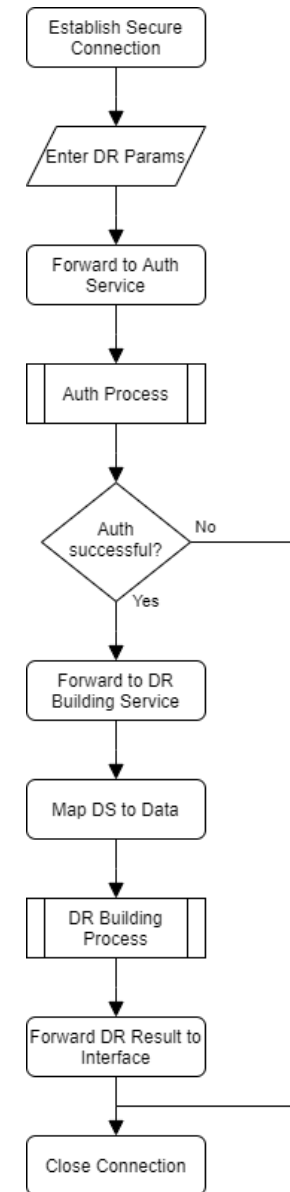
Data request building process

Data Model - Classes



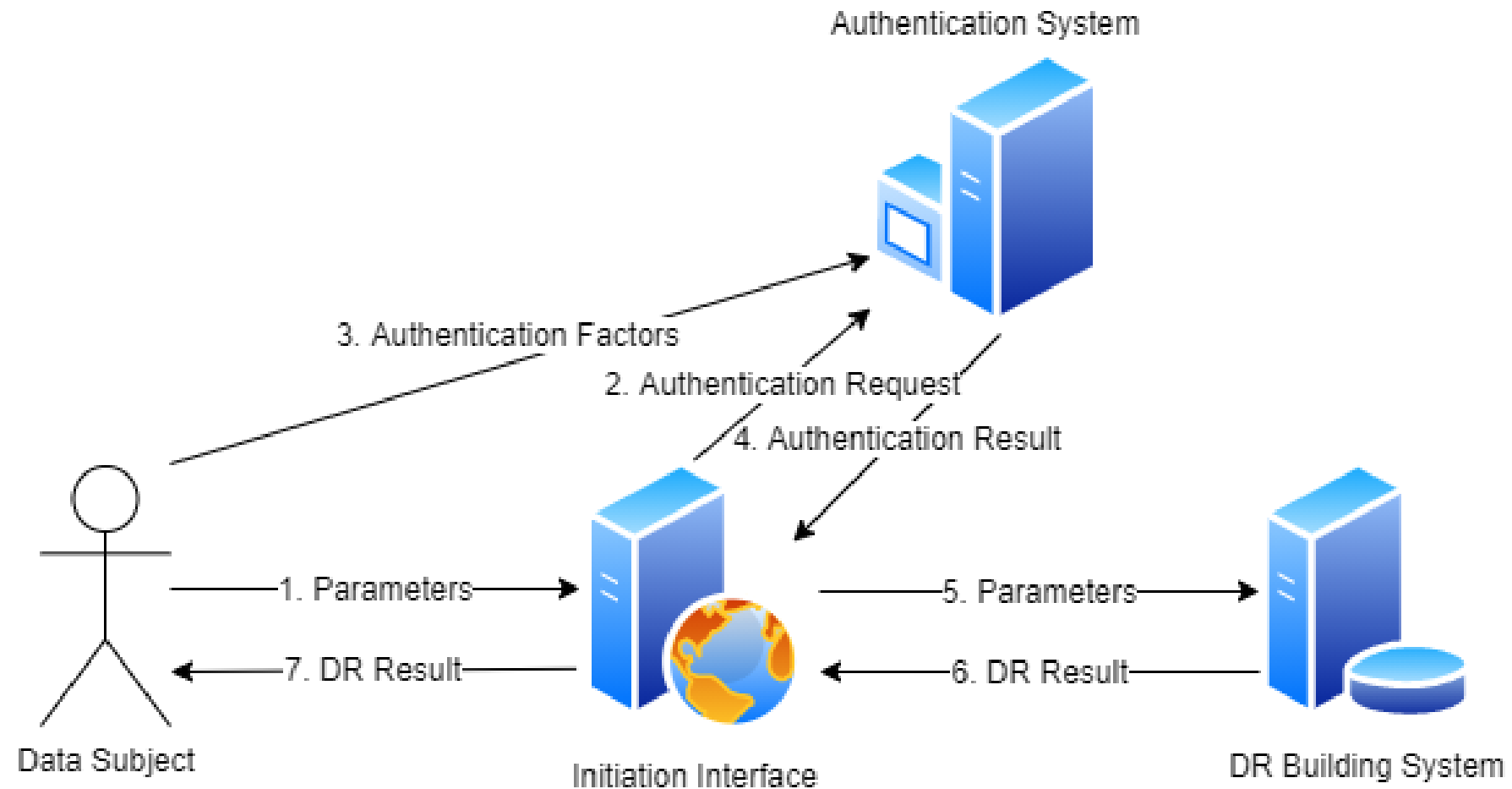
Data Request Model

- Easily accessible initiation
- Secure connection during the whole process
- Secure MFA scheme
- GDPR compliant data model
- Complete automation possible



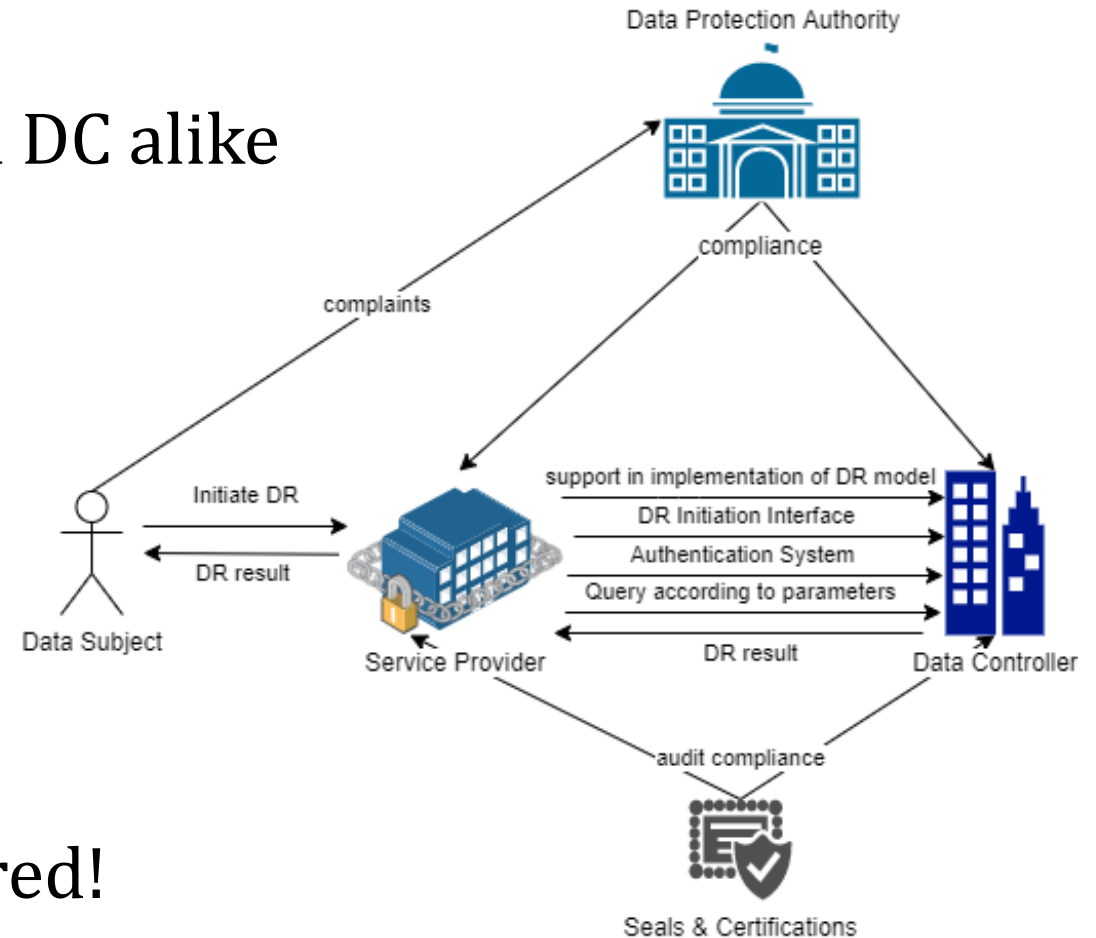
Data request process

DR Model – Components and Interactions



Right of Access as a Service

- Shared, known entity for DS and DC alike
- Support DC in implementation
 - Full or partial
- Optimize processes
 - Security
 - Automation
 - Usability
 - Open issues
- Certification and auditing required!



Right of Access as a Service information flow

Conclusion

- Secure, automated data request model is achievable
- BUT:
 - Open issues remain
 - DCs may lack expertise and/or resources

 Right of Access as a Service