

18734: Foundations of Privacy

Bootstrapping Privacy Compliance in Big Data Systems

Anupam Datta

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Privacy Compliance for Bing

The screenshot shows a web browser with two tabs. The first tab is the Bing homepage (http://www.bing.com/), featuring a search bar, navigation links (IMAGES, VIDEOS, MAPS, NEWS, SEARCH HISTORY, MORE), and a cartoon detective character. The second tab is the Bing Privacy Statement page (http://www.microsoft.com/privacystatement/en-us/b...), which details Microsoft's privacy policies. The privacy statement page includes sections for 'Cookies & Similar Technologies', 'Collecting Your Information', and 'How We Use Your Personal Information'. A sidebar on the right contains a table of contents with links to various sections like 'Cookies', 'Collecting Your Information', 'Using Your Information', etc.

Setting:

- ▶ Auditor has access to source code



The Privacy Compliance Challenge

Legal Team

Crafts Policy

Meetings

Privacy Champion

Interprets Policy

Meetings

Developer

Writes Code

Meetings

Audit Team

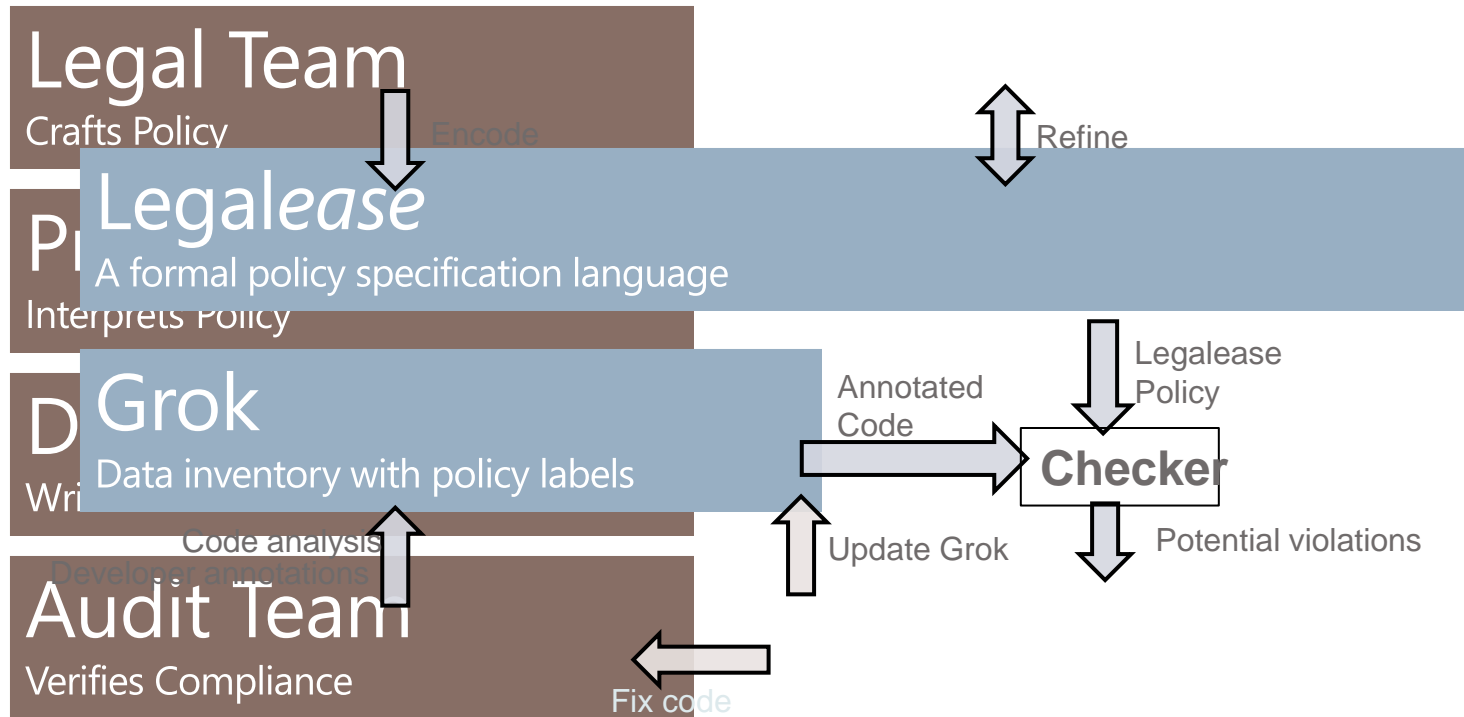
Verifies Compliance

English
Privacy Policy

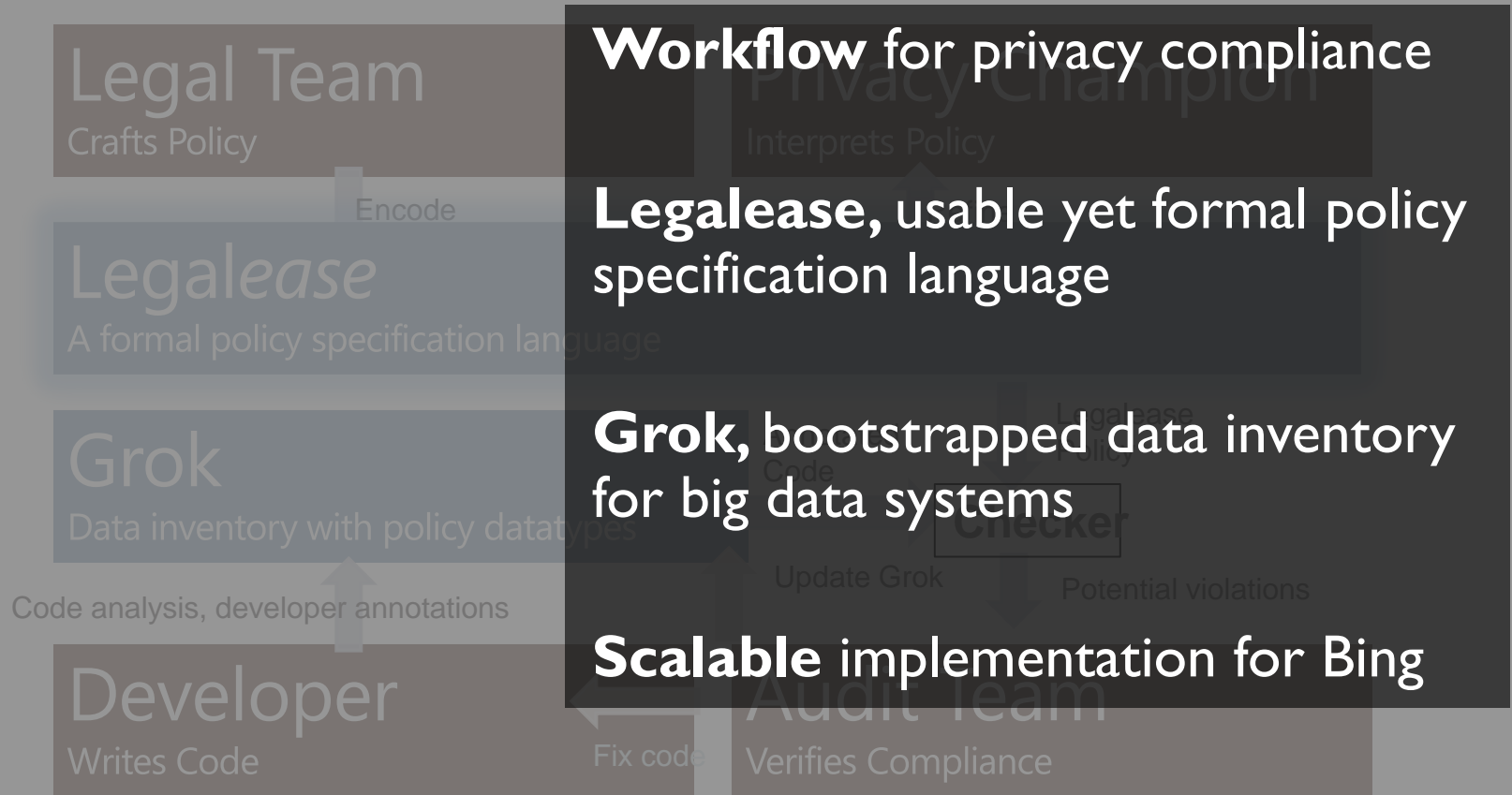
Compliant?

Millions of Lines of
Undocumented Code

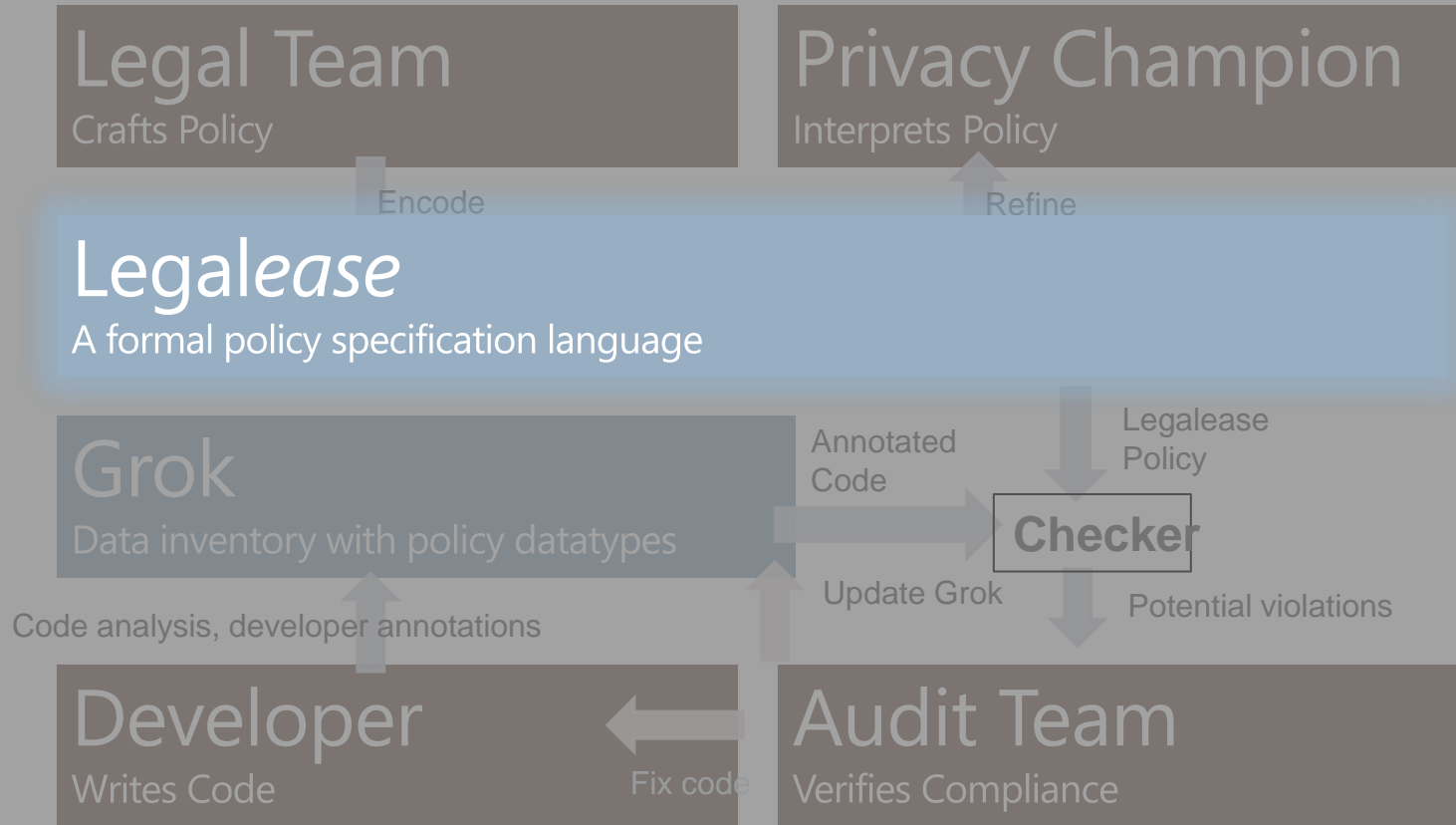
A Streamlined Audit Workflow



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A Streamlined Audit Workflow



Legalease : Syntax

Policy Clause C ::= $D \mid A$
Deny Clause D ::= **DENY** $T_1 \cdots T_n$ **EXCEPT** $A_1 \cdots A_m$
| **DENY** $T_1 \cdots T_n$
Allow Clause A ::= **ALLOW** $T_1 \cdots T_n$ **EXCEPT** $D_1 \cdots D_m$
| **ALLOW** $T_1 \cdots T_n$
Attribute T ::= $\langle \text{attribute-name} \rangle v_1 \cdots v_l$
Value v ::= $\langle \text{attribute-value} \rangle$

Legalease

DENY *Datatype* IPAddress
UseForPurpose Advertising

We will **not** use **full IP Address** for **Advertising**.

Legalease

DENY *Datatype* IPAddress

UseForPurpose Advertising

EXCEPT

ALLOW

Datatype IPAddress:Truncated

ALLOW

UseForPurpose AbuseDetect

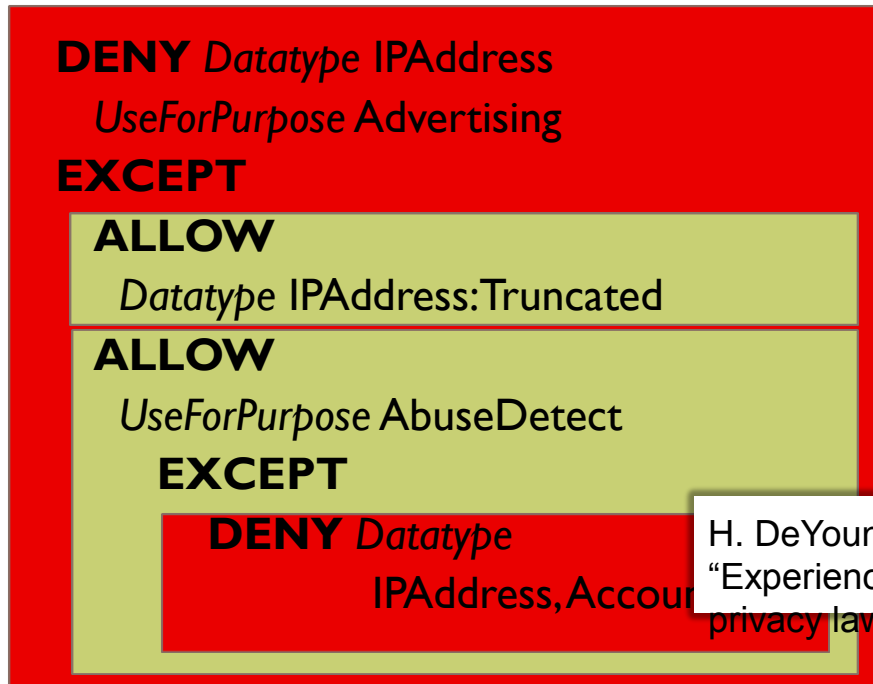
EXCEPT

DENY *Datatype*

IPAddress,AccountInfo

We will **not** use **full IP Address** for **Advertising**. IP Address may be used for **detecting abuse**. In such cases, it will not be combined with **account information**.

Designed for Usability



Exceptions

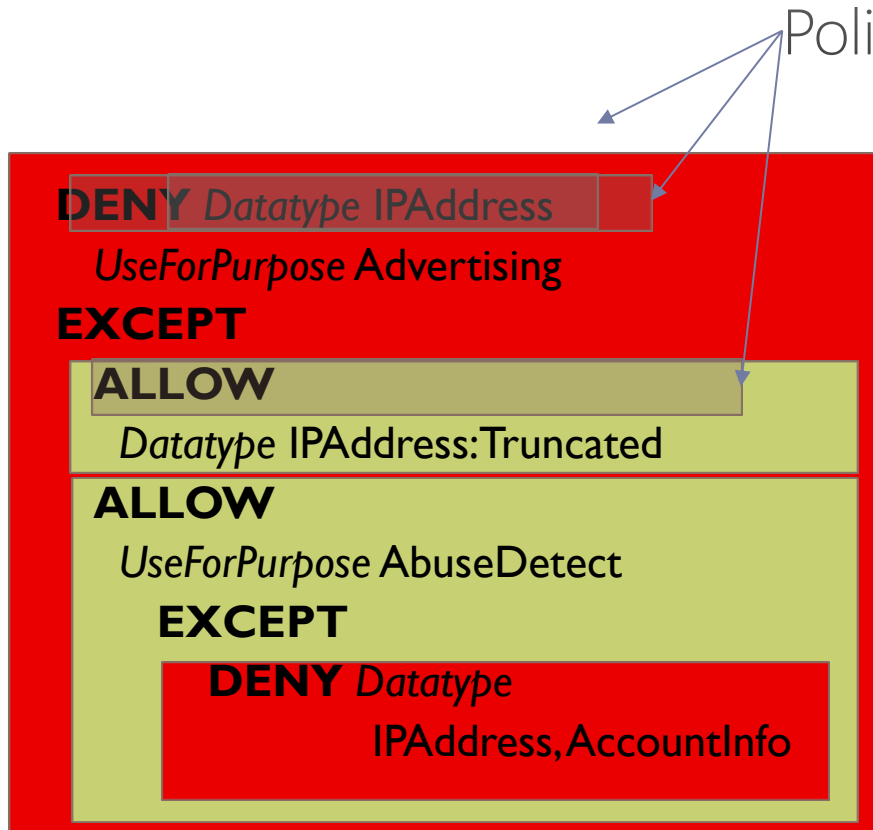
How legal texts are structured
One-to one correspondence

Local Reasoning

Each exception refines its
immediate parent
Formally proven property

H. DeYoung, D. Garg, L. Jia, D. Kaynar, and A. Datta,
“Experiences in the logical specification of the HIPAA and GLBA
privacy laws”

Legalease : In Action

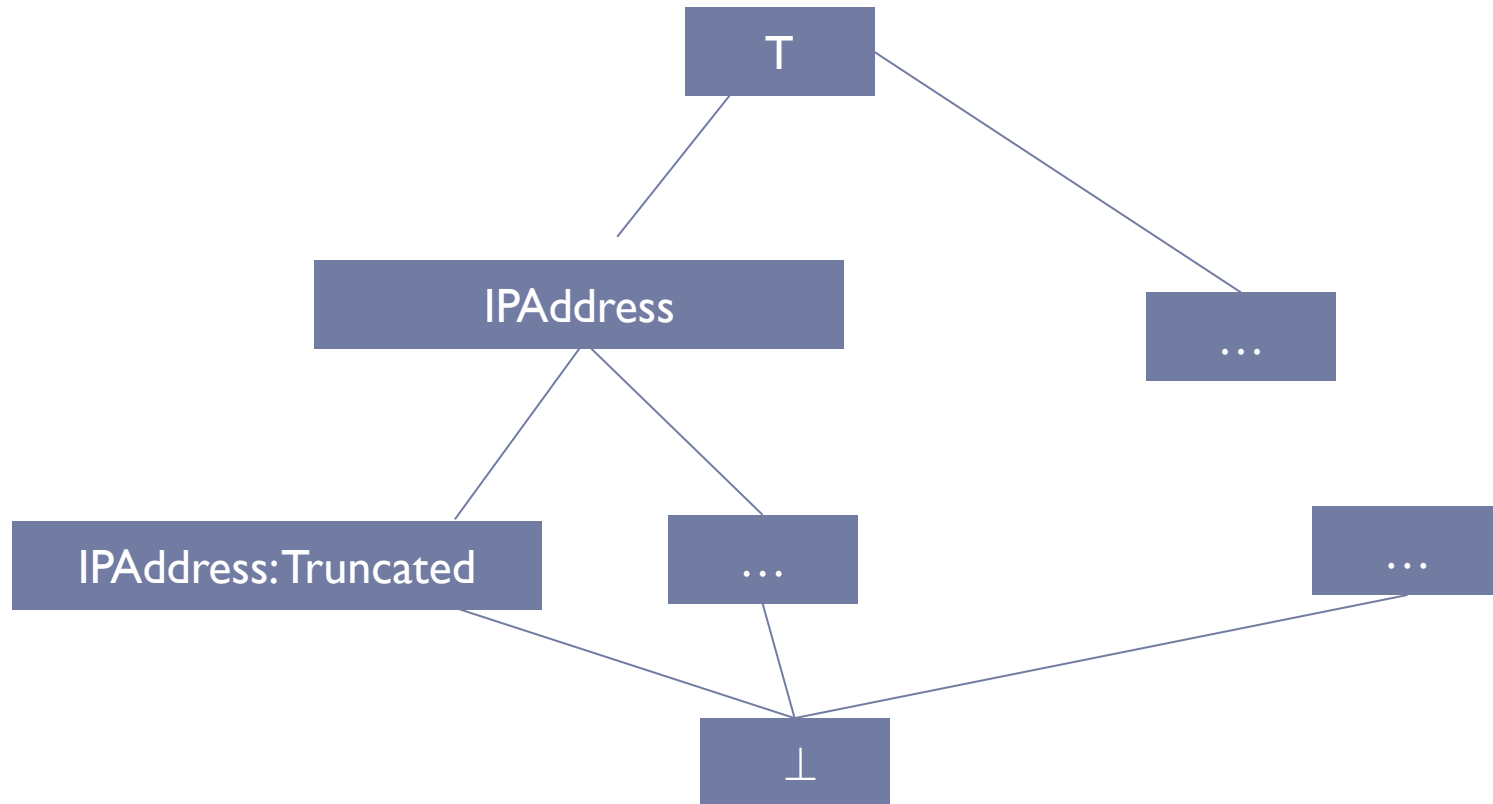


Labels
Datatype: IPAddress, AccountInfo
UseForPurpose: AdsAbuseDetection

We will **not** use **full IP Address** for **Advertising**. IP Address may be used for **detecting abuse**. In such cases, it will not be combined with **account information**.

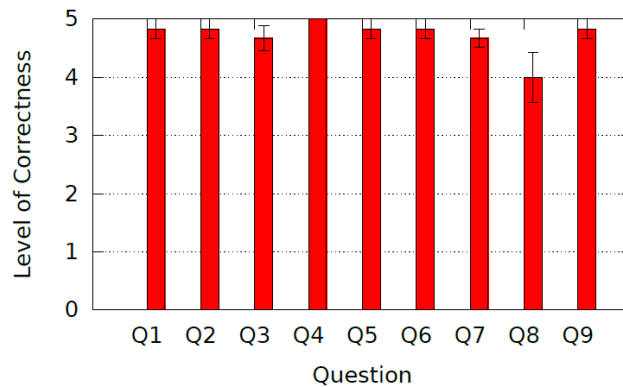
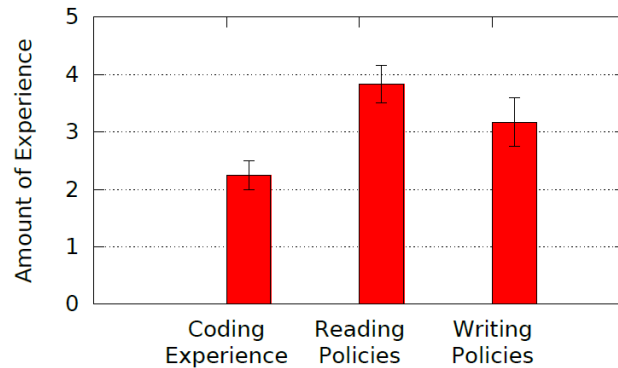


A Lattice of Policy Labels



- If “IPAddress” use is allowed then so is everything below it
- If “IPAddress:Truncated” use is denied then so is everything above it

Legalease Usability



Survey taken by 12 policy authors within Microsoft

Encode Bing data usage policy after a brief tutorial

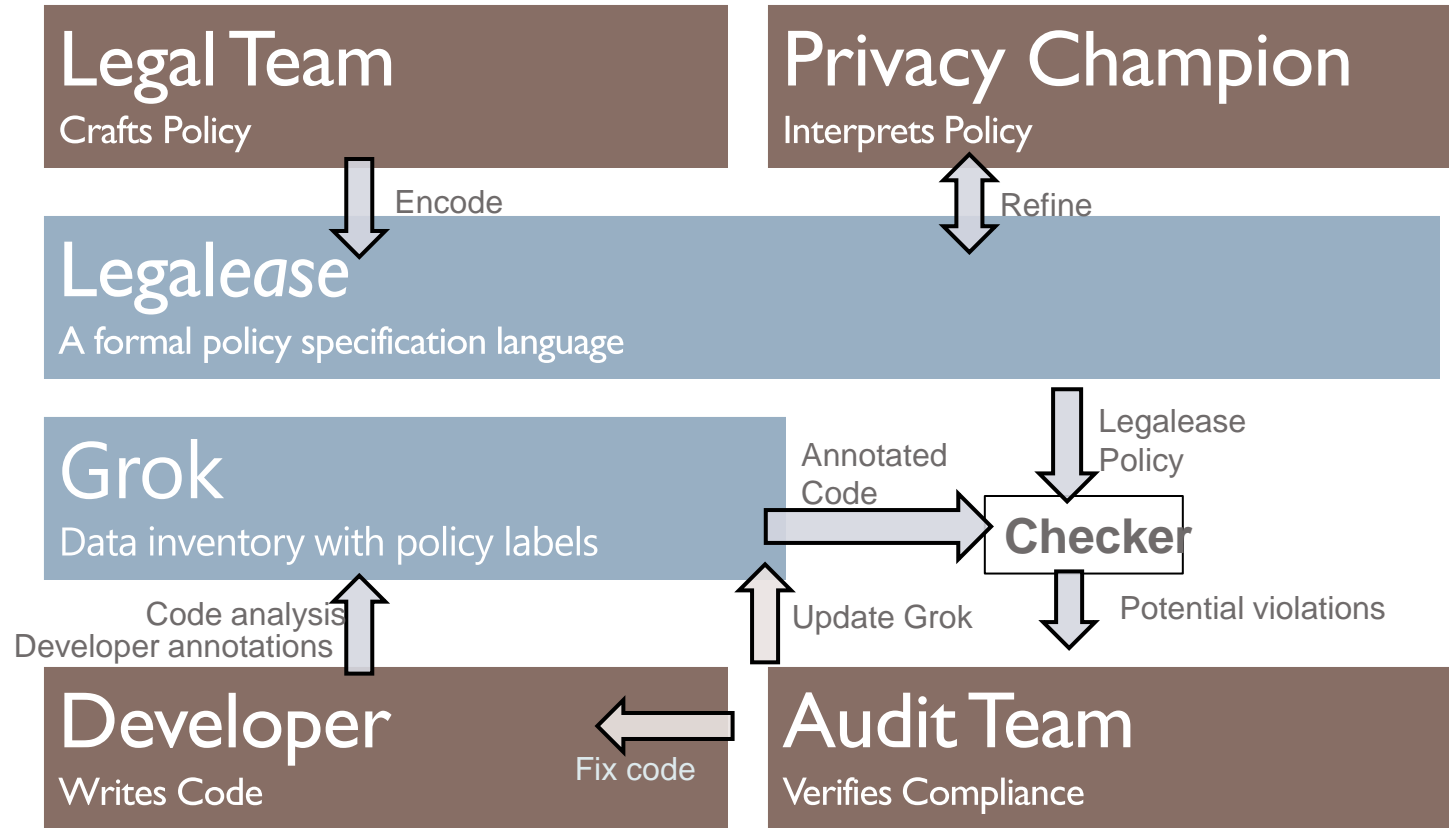
Time spent

2.4 mins on the tutorial

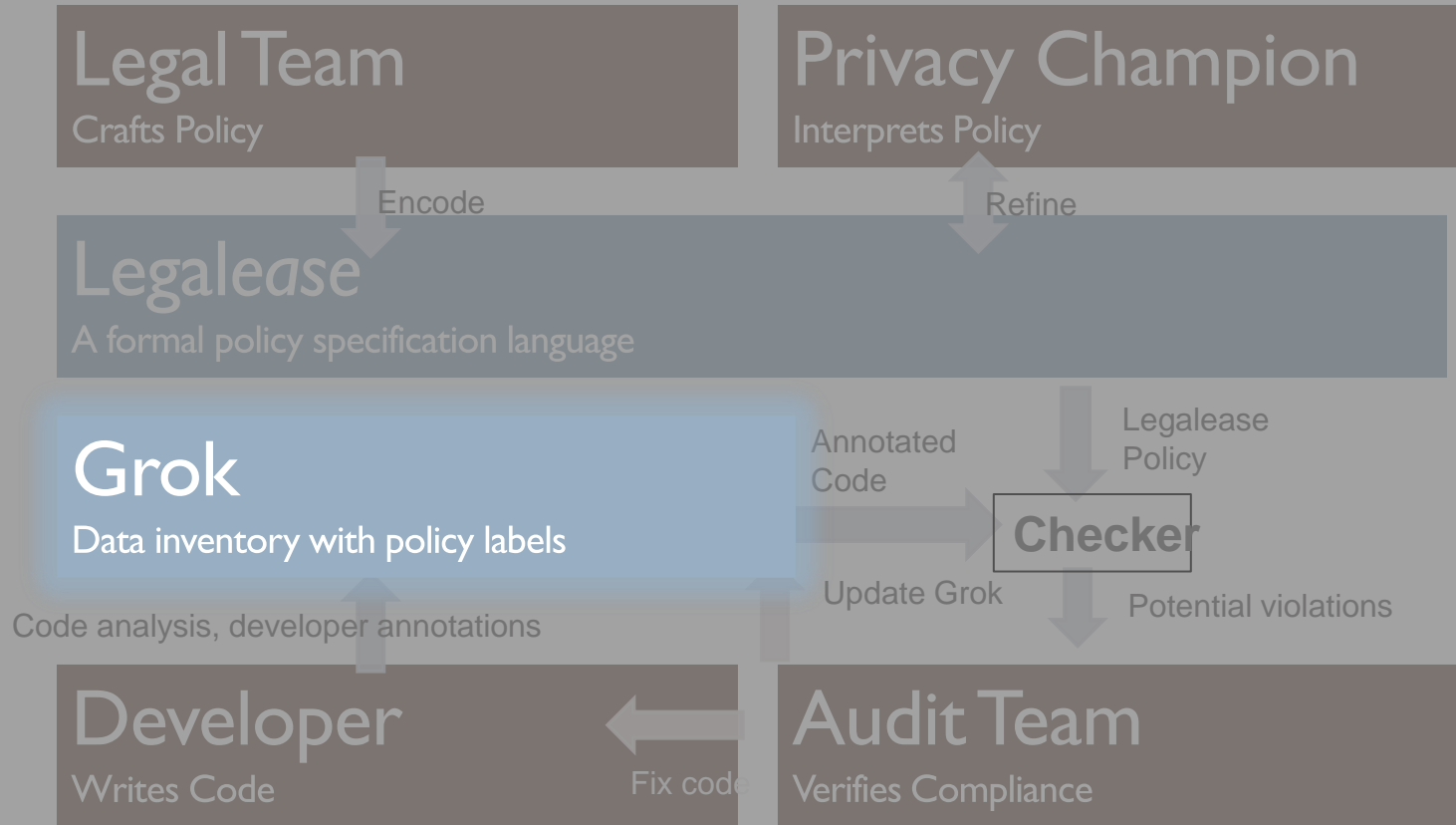
14.3 mins on encoding policy

High overall correctness

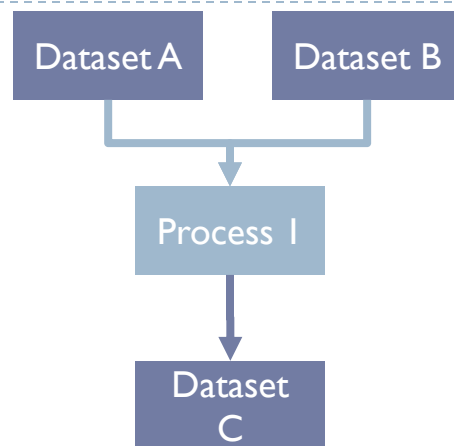
A Streamlined Audit Workflow



A Streamlined Audit Workflow



Map-Reduce Programming Systems



Scope, Hive, Dremel

Data in the form of Tables

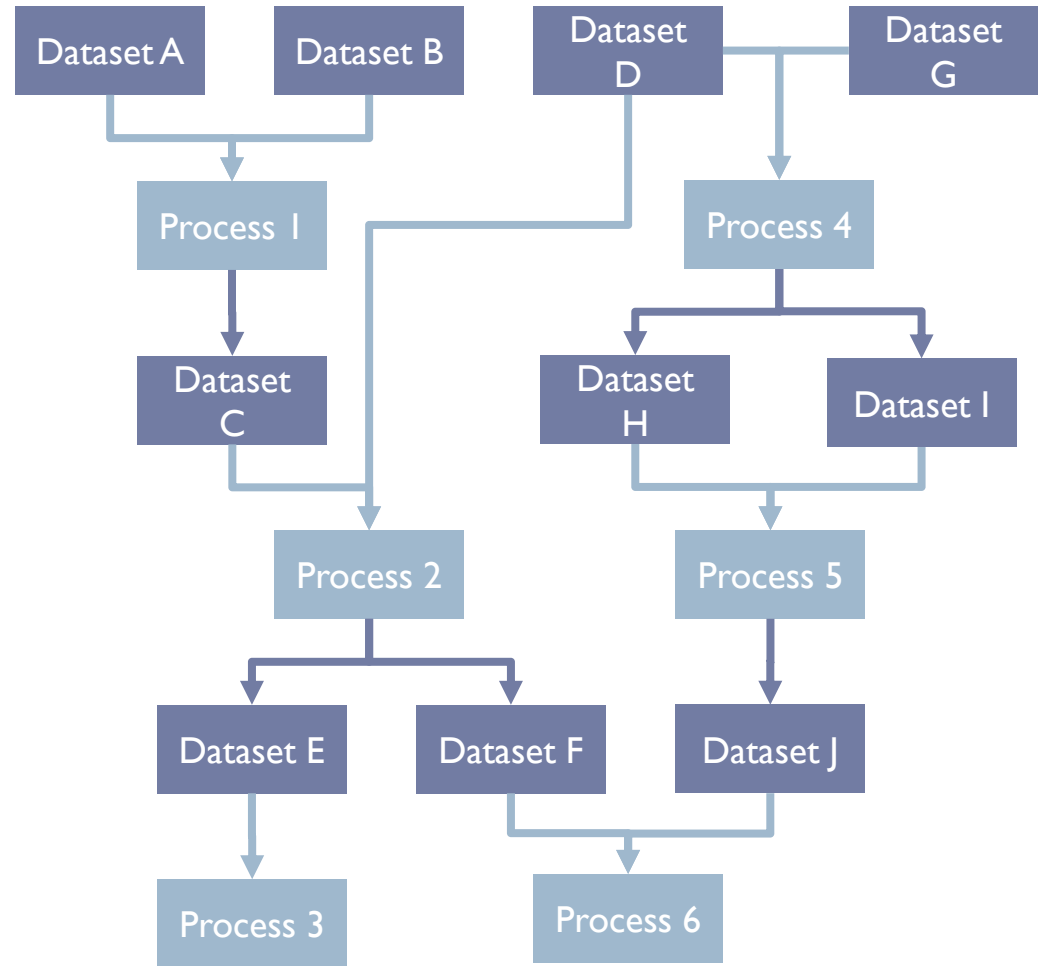
Code Transforms Columns to Columns

No Shared State

Limited Hidden Flows

```
users =  
    SELECT _name, _age FROM datasetAB  
user_tag =  
    SELECT GenerateTag(_name, _age)  
    FROM users  
OUTPUT user_tag TO datasetC
```

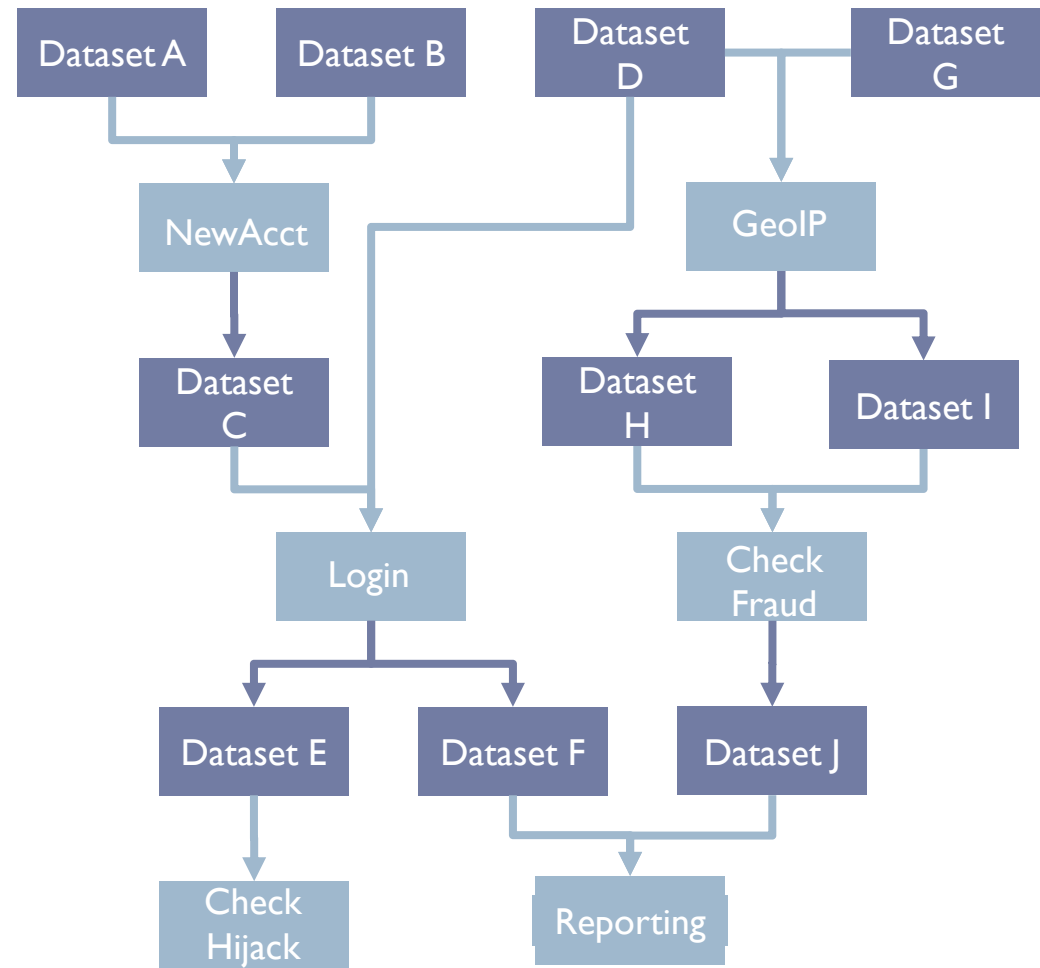

Grok



Grok

Purpose Labels

Annotate programs with purpose labels



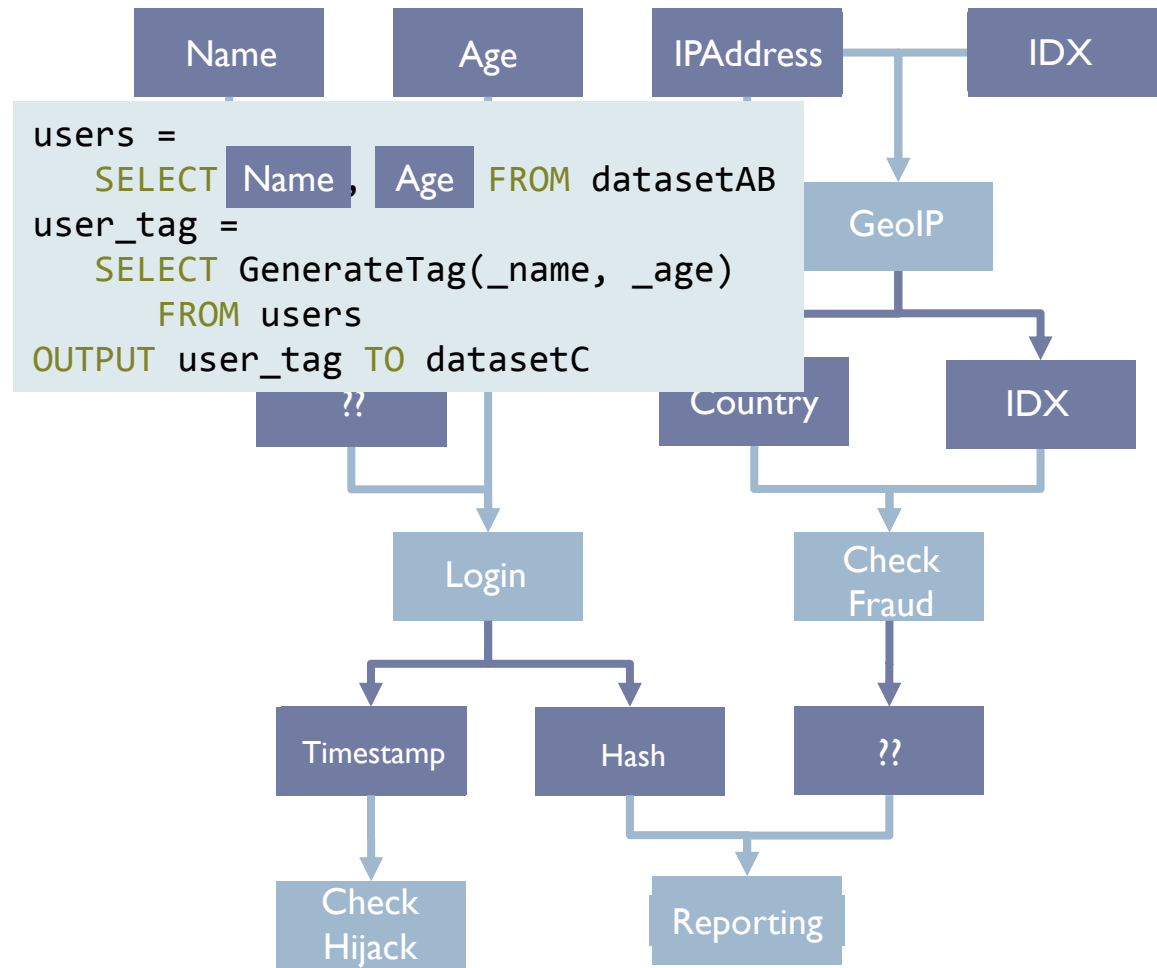
Grok

Purpose Labels

Annotate programs with purpose labels

Initial Data Labels

Heuristics and Annotations



Grok

Purpose Labels

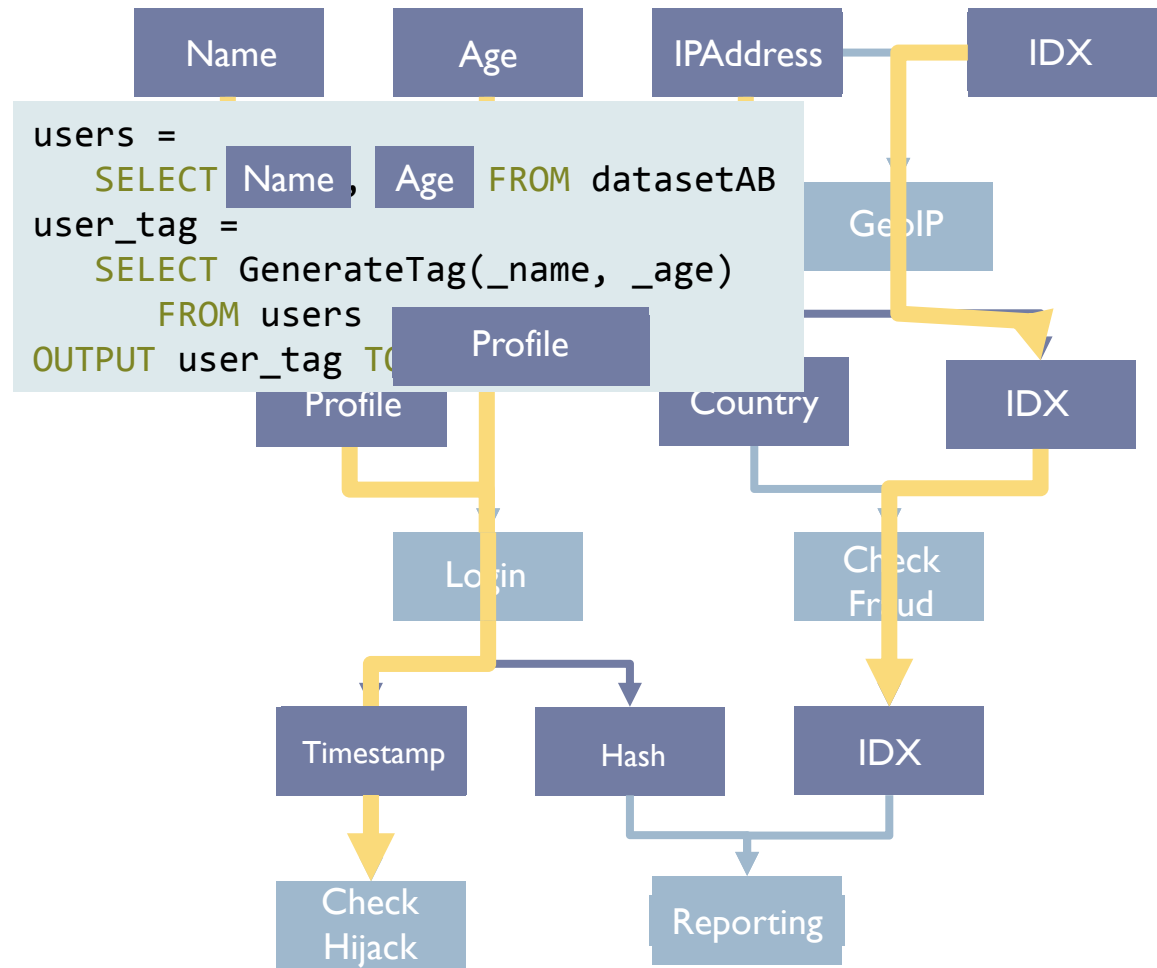
Annotate programs with purpose labels

Initial Data Labels

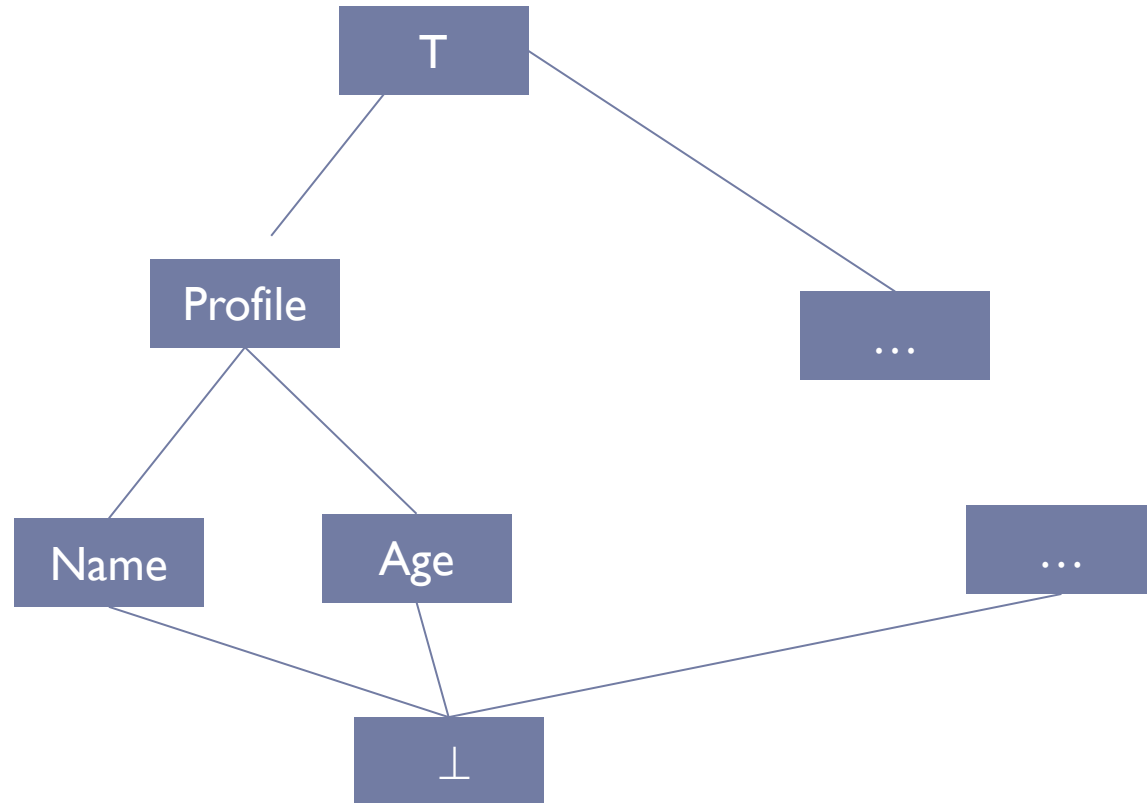
Heuristics and Annotations

Flow Labels

Source labels propagated via data flow graph



A Lattice of Policy Labels



- If “Profile” use is allowed then so is everything below it
- If “Name” use is denied then so is everything above it

Implicit flows

```
users =  
    SELECT Name , Age FROM datasetAB  
  
users_35 =  
    SELECT _name  
    FROM users  
    WHERE (_age > 35)  
  
OUTPUT users_35 TO Profile
```

Beyond direct flows discussed in healthcare audit examples

Map-Reduce

Map

Operate on rows
in parallel
eg. filtering

Reduce

Combine groups of rows
eg. aggregation

```
users =  
    SELECT Name, Age FROM datasetAB  
  
users_35 =  
    SELECT _name, _age  
    FROM users  
    WHERE (_age > 35)  
  
ages_35 =  
    SELECT _age, COUNT(_name) AS Profile  
    FROM users_35  
    GROUP BY _age  
  
OUTPUT ages_35 TO datasetC
```

Combine Noisy Sources

Carefully curated
regular expressions

Leverages developer
conventions

Significant Noise

Variable Name
Analysis

Expensive

Low Noise

Developer
Annotations

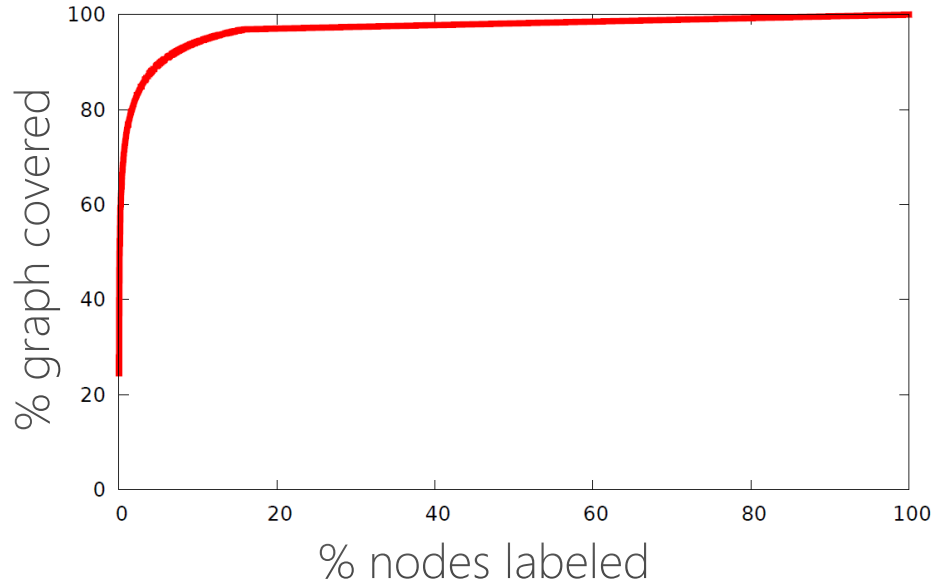
Very Expensive

Definitive

Need very few of these

Auditor
Verification

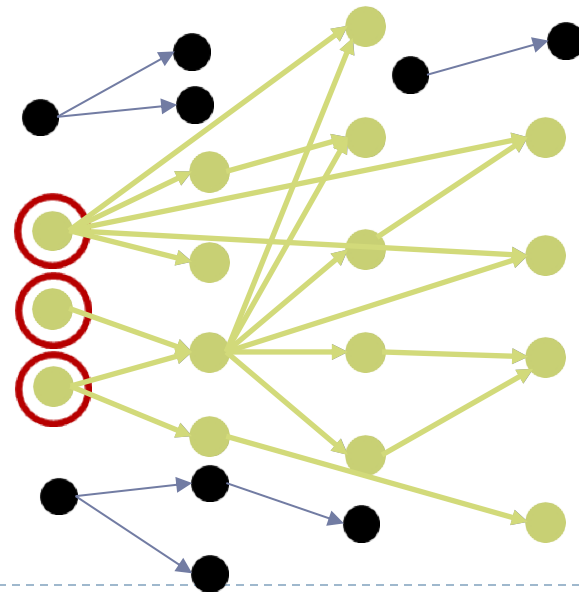
Why Bootstrapping Grok Works



A small number of annotations is enough to get off the ground.

Pick the nodes which will label the most of the graph

~200 annotations label 60% of nodes



Scale

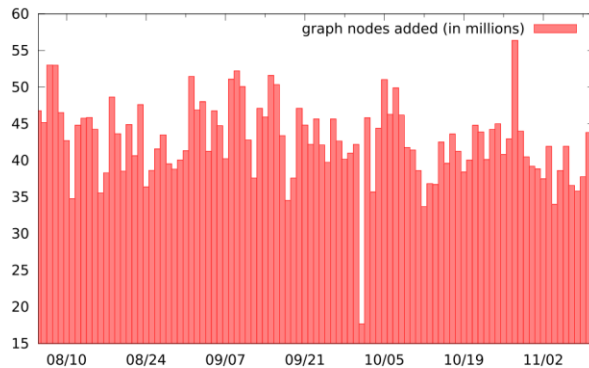
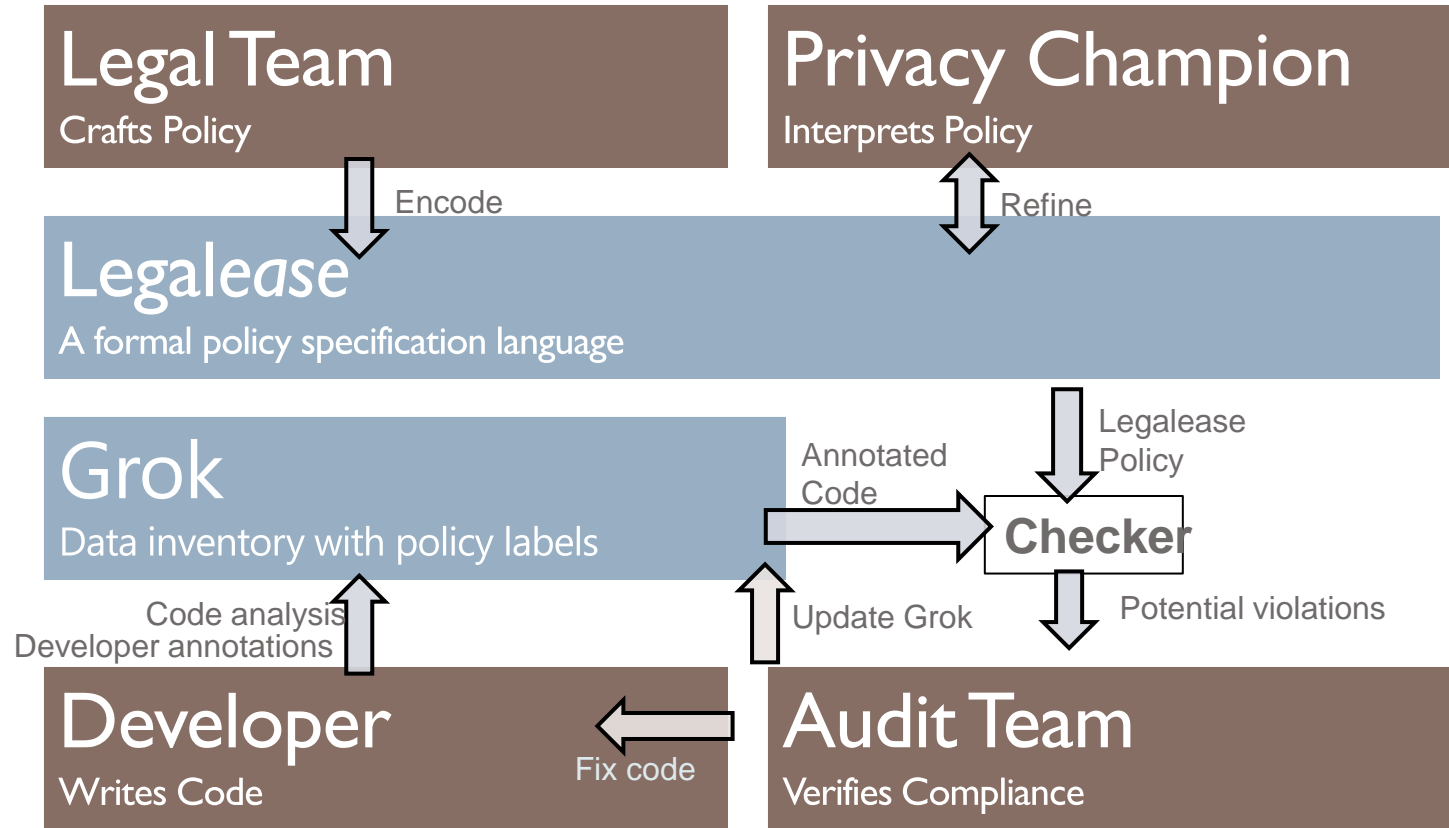


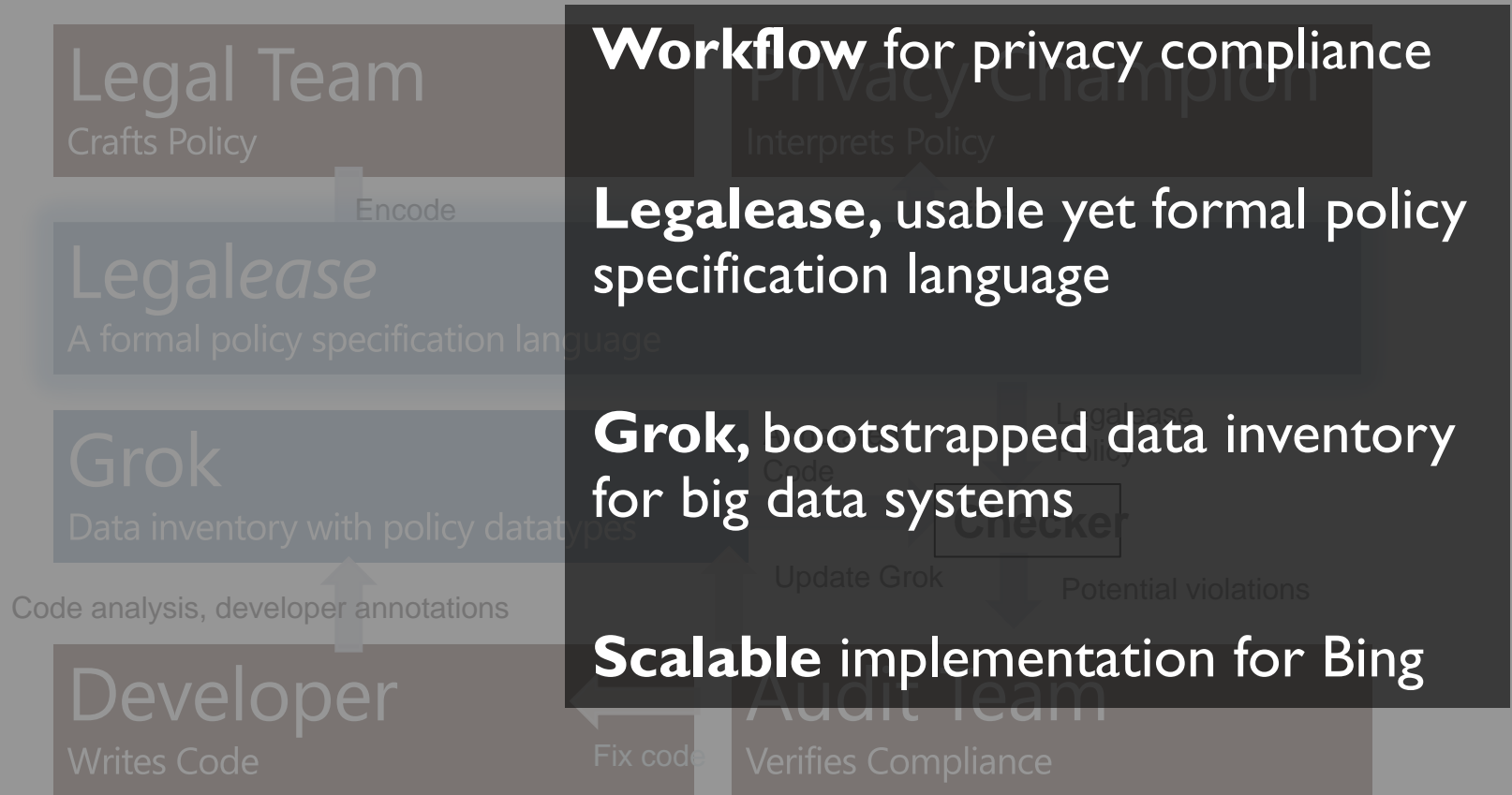
Fig. 9. Number of GROK data flow graph nodes added each day

- ▶ **77,000 jobs run each day**
 - ▶ By 7000 entities
 - ▶ 300 functional groups
- ▶ **1.1 million unique lines of code**
 - ▶ 21% changes on avg, daily
 - ▶ 46 million table schemas
 - ▶ 32 million files
- ▶ **Manual audit infeasible**
- ▶ **Information flow analysis takes ~30 mins daily**

A Streamlined Audit Workflow



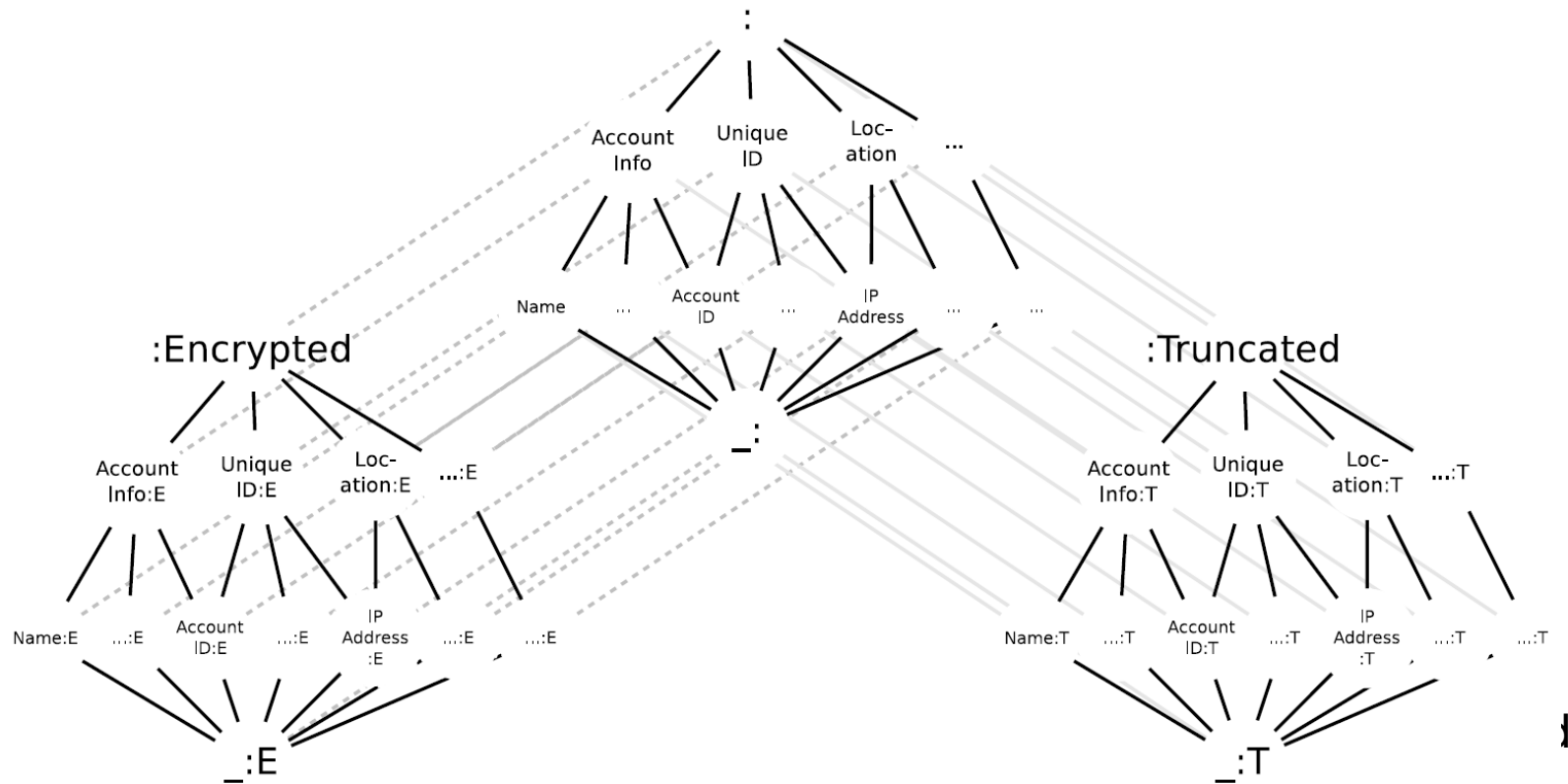
A Streamlined Audit Workflow



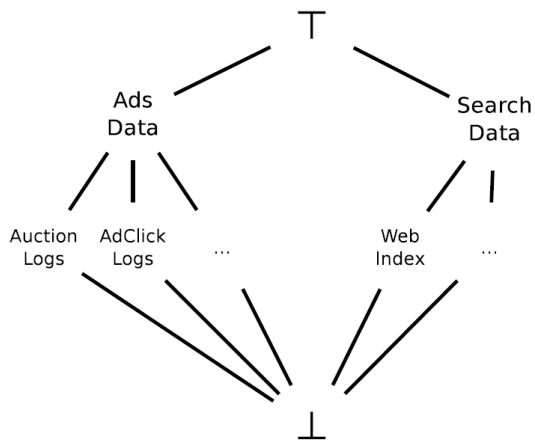
Reference

- ▶ S. Sen, S. Guha, A. Datta, S. Rajamani, J. Tsai, J. M. Wing, Bootstrapping Privacy Compliance in Big Data Systems, in *Proceedings of 35th IEEE Symposium on Security and Privacy*, May 2014.

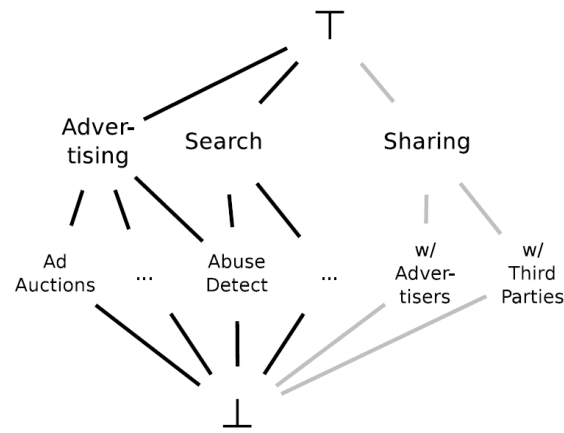
Policy Labels : Datatypes



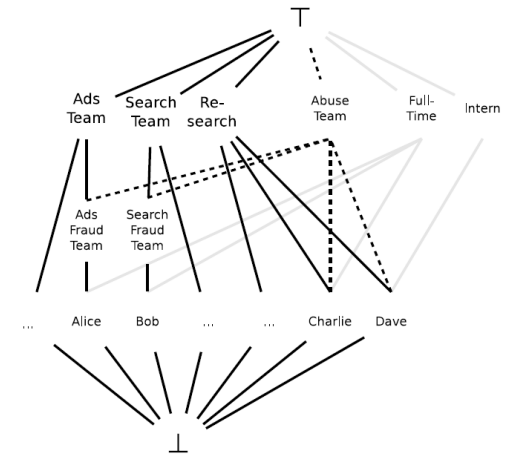
Policy Types : Concept Lattices



InStore Lattice



UseForPurpose Lattice



AccessByRole Lattice



Formal Semantics

$$\frac{\boxed{T^G \sqsubseteq T^C} \exists_i D_i \text{ denies } T^G}{\text{ALLOW } T^C \text{ EXCEPT } D_1 \cdots D_m \text{ denies } T^G} \text{ (A}_2\text{)}$$

Based on Lattice Orderings on Policy Types

Formal Semantics

$$\frac{T^G \sqsubseteq T^C \quad \boxed{\exists_i D_i \text{ denies } T^G}}{\text{ALLOW } T^C \text{ EXCEPT } \boxed{D_1 \cdots D_m} \text{ denies } T^G} \quad (A_2)$$

Recursively check exceptions

ALLOW clauses have DENY clauses as exceptions

Top Level clause determines Blacklist/Whitelist

Formal Semantics

$$\frac{T^G \sqsubseteq T^C \quad \exists_i D_i \text{ denies } T^G}{\text{ALLOW } T^C \text{ EXCEPT } D_1 \cdots D_m \text{ denies } T^G} \quad (\text{A}_2)$$

Structural properties about semantics

Always returns an unambiguous answer

Weakening lattice orderings makes policy more permissive

Encoding

ALLOW

EXCEPT

DENY *DataType* IPAddress:Expired
DENY *DataType* UniqueIdentifier:Expired
DENY *DataType* SearchQuery, PII *InStore* Store
DENY *DataType* UniqueIdentifier, PII *InStore* Store

DENY *DataType* BBEPData *UseForPurpose* Advertising

DENY *DataType* BBEPData, PII *InStore* Store

DENY *DataType* BBEPData:Expired

DENY *DataType* UserProfile, PII *InStore* Store

DENY *DataType* PII *UseForPurpose* Advertising
DENY *DataType* PII *InStore* AdStore

DENY *DataType* SearchQuery *UseForPurpose* Sharing
EXCEPT
ALLOW *DataType* SearchQuery:Scrubbed

◁ “we remove the entirety of the IP address after 6 months”
◁ “[we remove] cookies and other cross session identifiers, after 18 months”
◁ “We store search terms (and the cookie IDs associated with search terms) separately from any account information that directly identifies the user, such as name, e-mail address, or phone numbers.”
◁ “we do not use any of the information collected through the Bing Bar Experience Improvement Program to identify, contact or target advertising to you”
◁ “we take steps to store [information collected through the Bing Bar Experience Improvement Program] separately from any account information we may have that directly identifies you, such as name, e-mail address, or phone numbers”
◁ “we delete the information collected through the Bing Bar Experience Program at eighteen months.”
◁ “we store page views, clicks and search terms used for ad targeting separately from contact information you may have provided or other data that directly identifies you (such as your name, e-mail address, etc.).”
◁ “our advertising systems do not contain or use any information that can personally and directly identify you (such as your name, email address and phone number).”
◁ “Before we [share some search query data], we remove all unique identifiers such as IP addresses and cookie IDs from the data.”