# A Privacy framework for DNS big data

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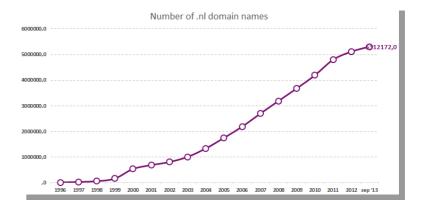




#### **SIDN**

- ".nl" (Registry voor Nederland)
- 5.5M domain names, >1.600 registrars
- > 1.000.000.000 DNS queries per day
- Private foundation with public task









#### **SIDN Labs**

- R&D team SIDN
- Improve services of SIDN
- Center of expertise
- Improve security of Internet in the Netherlands
- Facilitates external research







# **Privacy Framework**

• What?

• Why?

• How?





#### Privacy Framework: Why?

- Public service that is vital to Dutch society and economy
- Keep trust and confidence in SIDN as the operator for .nl
- Responsibility to be proactive in the field
- SIDN wants to act transparently





### **Privacy Framework: Innovations**

- Introduces Privacy management to the use of DNS data
- Integrates legal, technical and organisational aspects of privacy management





#### **ENTRADA: DNS Big Data Platform**

- ENhanced Top-level domain Resilience through Advanced Data Analysis
- Goal: Develop and evaluate big data applications
  - To Safeguard stability of '.nl'
  - To increase the safety of the (Dutch) Internet
  - To Detect botnets and abuse
  - Non-goal: commercial use
- What about privacy?



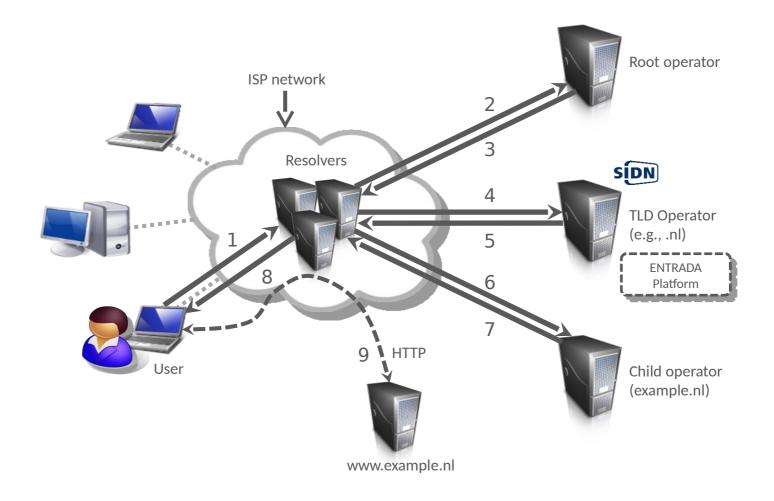


# **ENTRADA: DNS Big Data Platform User Interfaces** DNS autoconfig service Services en applicaties statistics dashboard **ENTRADA** platform Algortimes Storage Basisfaciliteiten ATLAS EPP DNS RDAP Bronnen (intern en extern)





# DNS







# (Potential) Personal Data in DNS Queries

• IP Address

Queried name

- 'other'
  - Timestamps
  - Protocol flags
  - Etc.





#### **WBP**

Dutch Data Protection Act (Wet Bescherming Persoonsgegevens, WBP)

#### Personal Data:

'any piece of information regarding an identified or identifiable natural person'

#### • Processing:

• 'any action or sequence of actions involving personal data, including but not restricted to the collection, recording, sorting, [...] deletion or destruction of such data'





#### Requirements for Processing

- Public Function
- Contractual obligation
- Legitimate Basis
- Explicit consent
- Purpose Limitation
  - Personal data may only be used for the purpose for which it was collected
- Special Personal Data explicitely forbidden
  - Religion
  - Political views
  - Etc.





#### WBP and ENTRADA

- We are not using 'Public Function': too weak
  - besides, we are not government
- Explicit consent not possible
  - So we need to be completely transparent
- Legitimate basis + Purpose Limitation
  - The goal is for the benefit of the users themselves





#### WBP and ENTRADA: IP Addresses

Can't simply anonimize them

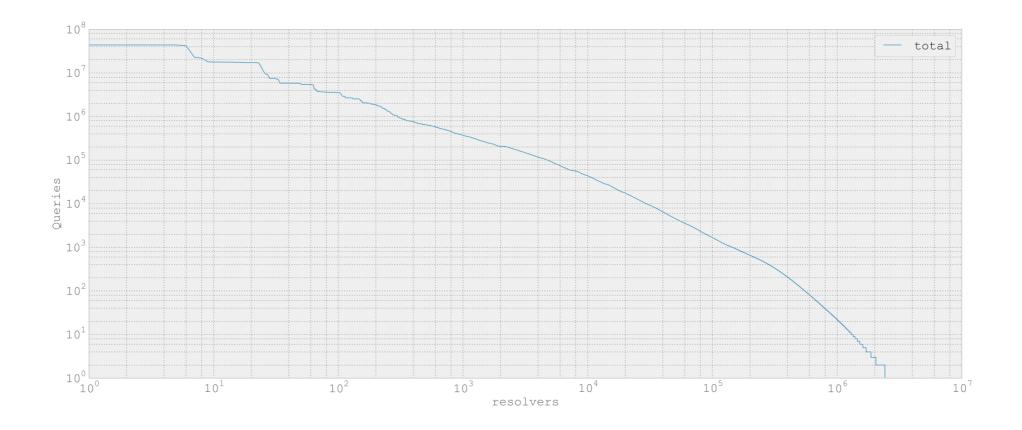
Most addresses are from resolvers (shared by users)

• BUT: Resolvers may be 'home' systems





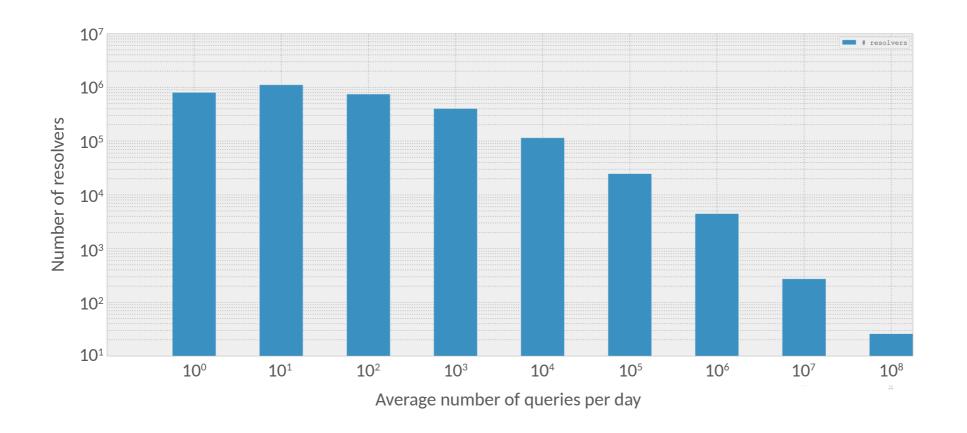
# Number of Queries per Resolver per Day







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#### WBP and ENTRADA: IP Addresses

- Most individual resolvers are 'home' resolvers
  - Few users, so addresses likely to be personal data
- 'Big' resolvers either ISP or domainers
  - In the second case, still personal data
- Better metrics are future work
  - Problem: to decide whether the address is personal data, you need to process it





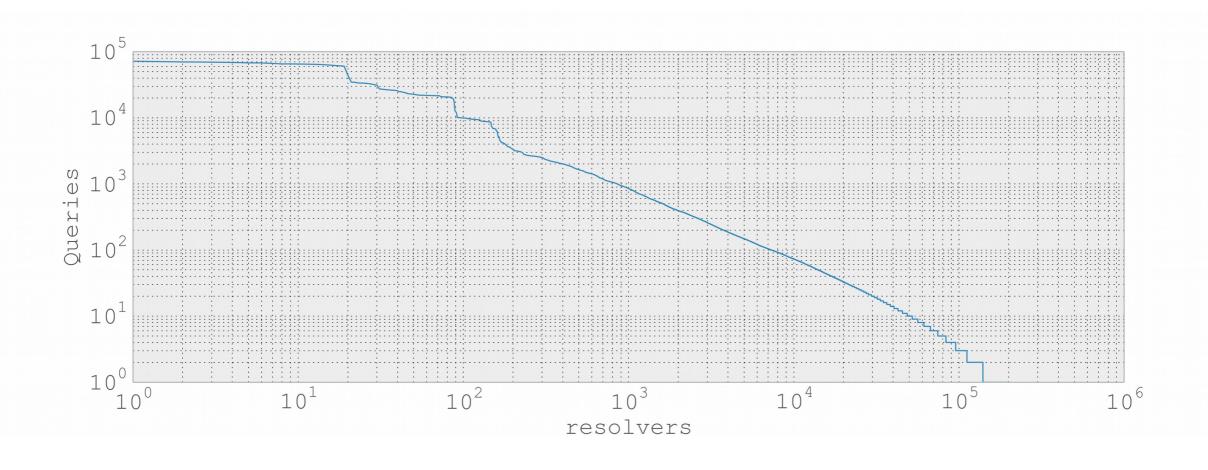
#### WBP and ENTRADA: Queried names

- Single query does not say much
  - 'www.universityoftilburg.nl'
  - Not even associated with Tilburg University;)
- Combined data can be considered personal
  - Query patterns, pre-fetching
- Query names may include other personal data
  - Personal names (firstname.lastname.mycloud.nl)
  - IP addresses (192.0.2.1.customer-adsl.example.nl)
- Can also be combined with IP address of resolver (previous slides)





# WBP and ENTRADA: IP Addresses in Queried names







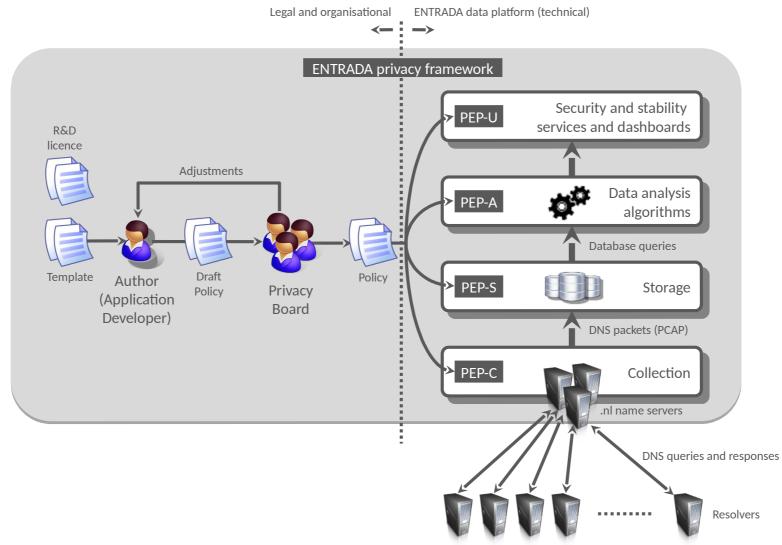
# Privacy Framework: Requirements

- Purpose limitation
  - Per type of use of the data (i.e. per application)
- Verifiable
  - Transparency
- Simple
- Extensible





# Privacy Framework: Overview







## **Privacy Framework: Policies**

- One policy per application
- Policy describes:
  - Purpose
  - Data that is used
  - Filters on the data
  - Access to the data
  - Type of application (Research vs. Production)
  - Other security measures





# Privacy Framework: Data Filters at PEPs

Anonimization

Pseudonimization

Aggregation

• Etc.





## Privacy Framework: Privacy Board

- Reviews and approves policies
- Members:
  - Legal
  - Technical
  - Organisational
- Publishes approved policies





# Privacy Framework: Position Paper

Currently at https://sidnlabs.nl





# **Privacy Framework: Conclusions**

DNS Data can be personal data

• DNS Data processing needs privacy-protecting measures

Not 'just' technical





#### Privacy Framework: Future work

- Solicit feedback and discussion (hi!)
- Better metrics for 'public' vs 'private' resolvers
- How to incorporate the policy system when sharing data
- Keep eye on new laws (EU Data protection regulation, for one)
- Apply the framework to other types of data





# Got questions?

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