Status Update
REFEDS Working Group
Attribute Release Recommendations

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TOPICS

• Goals
• A new(er) interpretation of the EU Data Protection Directive
• Preliminary Recommendations
• Next Steps
• Questions.
Goals

• Find an approach to the data protection/privacy liability risks and exposures faced by IDPs and SPs in the worldwide Higher Education/Research environment
  • That makes it as simple as possible for campus users to successfully login and enter destination SP sites
  • Is compatible with regional and national laws and regulations
  • Finds an appropriate balance between risk and value
• Find a scaleable approach to managing attribute release policies.
In Scope

• Provide suggestions to Federations, IDPs, and SPs on Business Practices and Policies that are believed to be compliant with EU regulations.

• Provide recommendations on GUI requirements to meet the legal and regulatory requirements.

• Provide suggestions to Federations, IDPs, and SPs on scaleable approaches that simplify the management of attribute release policies.

• Provide recommendations on metadata usage to support the scaleable approach.
Out of Scope

- Browser user is under the legal age
- Issues that arise if an IDP in the EU releases PII attributes to an SP in the US (Safe Harbor framework)
The New Interpretation

• There are few, if any, attributes that every regulator will agree are not PII when they are linked to an IP address or AAI session ID.

• An Attribute is NECESSARY if the service that the user has requested cannot be delivered unless the Attribute is released. (Minimal disclosure)

• An Attribute is categorized as REQUIRING CONSENT if the service can operate without it, but the service will provide additional value to the user (or to other users of the site) if the Attribute is provided.
Major Differences with the DPGPP Interpretation

• SPs self-assigned themselves to categories (category PII or non-PII)
  • All attributes now considered to be PII
• NECESSARY was defined as
  • related to an employee doing his work
  • related to a student taking his courses and otherwise being educated
• That definition comes up with a different answer for each user (and potentially, even for the same user at different times!)
Recommendations Brought Forward Today

• Policy Framework
• Consent GUI Recommendations
• SAML 2 Metadata Recommendations
Policy Framework

• An SP MUST divide the set of attributes it is requesting into categories of NECESSARY and REQUIRING CONSENT
• An Attribute is NECESSARY if the service that the user has requested cannot be delivered unless the Attribute is released. (Minimal disclosure)
• Services with NECESSARY attributes must use a UI to notify the user of the release.
Policy Framework (more)

• An Attribute is categorized as REQUIRING CONSENT if the service can operate without it, but the service will provide additional value to the user (or to other users of the site) if the Attribute is provided.

• User Consent for Release is defined as any positive, unambiguous indication of the user's specific agreement; the user being fully informed of the consequences of their agreement and under no pressure to either grant or withhold consent.

• The user MUST provide Consent before REQUIRING CONSENT attributes are released.
Policy Framework (more)

• Services with some NECESSARY and some CONSENT-based attributes will require a hybrid release UI (notification and consent).
Consent GUI Recommendations

• When requesting Consent, The IDP MUST present the DisplayName, Logo, and Description of the SP

• The IDP MUST present the SP's PrivacyStatementURL. This is done even if all attributes are released based on NECESSITY.

• The SP’s Privacy and Data Protection Protection Policy policy must be available at least in English and address the issues presented in Article 11 of the data protection directive
Consent GUI (more)

• The IDP MUST present a list of the attributes and values the SP has defined as NECESSARY. No user consent is required before release.

• The IDP MUST present a list of the attributes and values the SP has defined as REQUIRING CONSENT. The user MUST be able to consent/block each individual attribute and value.

• The IDP MUST remember which attributes' release the user has consented to (if consent is used), or been informed of (if NECESSITY is used).

• If an SP's attribute release policy changes, the user MUST be prompted again for NOTIFY and/or CONSENT.
Consent GUI (more)

• The IDP should provide the ability to configure localised descriptions of the attributes (e.g. what PersistentID means)

• Major Issue -- There are sets of attributes that are very similar, sometimes overlapping (e.g. names) An SP may request all of a person's name attributes, which will result in a cluttered and confusing attribute release GUI.
SAML 2 Metadata Recommendations

• RequestedAttribute elements in each SP entry are used to describe the attributes that the SP needs and desires.

• The metadata MUST indicate whether an attribute is in the NECESSARY or CONSENT REQUIRED category.

• For each CONSENT REQUIRED attribute, the metadata SHOULD provide a textual description of why the SP is asking for this attribute (e.g. what added value a user would obtain by releasing it)
SAML 2 Metadata (more)

- SP entries MUST contain elements for DisplayName, Description, Logo, and PrivacyStatementURL.
- the DPGPP document's LegalGrounds element is no longer unnecessary.
- The metadata SHOULD include a way of indicating that an IDP or SP operates in conformance with these recommendations.
Next Steps (discussions already underway)

- Develop recommendations related to risk and the need for contracts
- Develop recommendations on Attribute Harmonization
- Develop recommendations to simplify the process IDPs would use to manage attribute release policies
- Projected delivery date --
Questions ?
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