

## **Top 10 Privacy Risks Project**

Results presentation @ German OWASP Day 2014

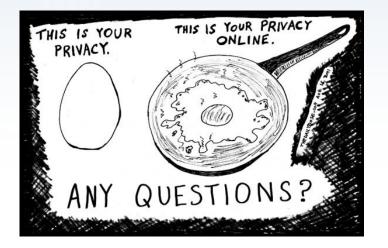
9 December 2014, Hamburg

Florian Stahl (Project Lead, msg systems, Munich)



## Privacy

- Definitions:
  - A state in which one is not observed or disturbed by other people
  - The right to be let alone (Edward Warren, 1890)
- Different approaches (Europe vs. US)
- IT Security enables Privacy in most cases





## Problem

- Many web applications contain privacy risks
- Anyway, they are compliant to privacy and data protection laws because
  - They are hosted in countries with poor privacy laws
  - Lawyers focus on compliance, not on real-life risks for personal data
- No existing guidelines or statistical data about privacy risks
- Foundation of the OWASP Top 10 Privacy Risks Project in early 2014
- Member of Internet Privacy Engineering Network (IPEN)
- Nearly 100 privacy and security experts participated

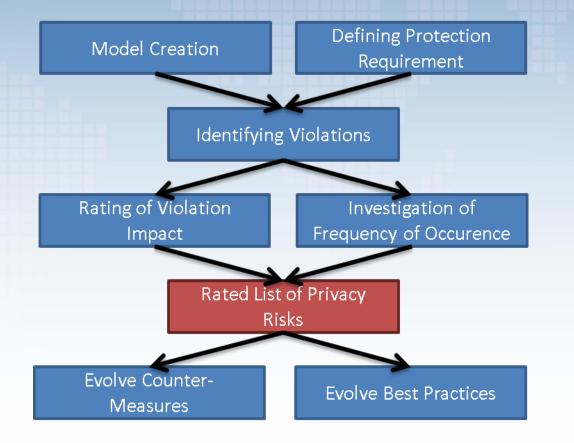


## Goal

- Identify the most important technical and organizational privacy risks for web applications
- Independent from local laws based on OECD Privacy Principles
- Focus on real-life risks for
  - User (data subject)
  - Provider (data owner)
- Help developers, business architects and others to understand and improve web application privacy
- Provide transparency about privacy risks



## Method (1/2)





## Method (2/2)

## Survey to evaluate frequency of occurence

- 62 privacy and security experts participated
- Rated 20 privacy violations for their frequency in web sites

#### Impact rating

| Protection | Criteria for the assessment of protection demand                   |                |                             |                         |                     |  |  |
|------------|--|----------------|-----------------------------|-------------------------|---------------------|--|--|
| demand     | Application operator perspective                                   |                | Data subject perspective    |                         |                     |  |  |
|            | Impact on<br>reputation and<br>brand value                         | Financial loss | Social standing, reputation | Financial well<br>being | Personal<br>freedom |  |  |
| Low - 1    | The impact of any loss or damage is <b>limited</b> and calculable. |                |                             |                         |                     |  |  |
| Medium – 2 | The impact of any loss or damage is <b>considerable</b> .          |                |                             |                         |                     |  |  |
| High – 3   | The impact of any loss or damage is <b>devastating</b> .           |                |                             |                         |                     |  |  |



## Result: Top 10 Privacy Risks

- P1 Web Application Vulnerabilities
- P2 Operator-sided Data Leakage
- P3 Insufficient Data Breach Response
- P4 Insufficient Deletion of personal data
- P5 Non-transparent Policies, Terms and Conditions
- P6 Collection of data not required for the primary purpose
- P7 Sharing of data with third party
- P8 Outdated personal data
- P9 Missing or Insufficient Session Expiration
- P10 Insecure Data Transfer



#### P5: Non-transparent Policies, Terms & Conditions

- Privacy Policies, Terms & Conditions are not up-to-date, inaccurate, incomplete or hard to find
- Data processing is not explained sufficiently
- Conditions are too long and users do not read them
- Hard to standardize
- Possible Solutions:
  - Text analyzer: readability-score.com
  - HTTPA: http with accountability

✓ "I have read and agree to the terms and conditions" Is the **Biggest Lie** on the web.



l confessed BiggestLie.com



#### P7: Sharing of Data with 3rd Party

### **Third Parties:**

- Advertisers
- Subcontractors
- Video integration
- Maps
- Social networks

### Problems:

- Data is transferred or sold to third parties without user's knowledge and consent
- Complete loss of control





Adap.tv AdForm Adify Adition Adnologies Adroit Digital Solutions Adrolays AdScale ADTECH Advertising.com AppNexus Audience Science **BidSwitch** Casale Media ChartBeat Criteo cXense Datalogix Digilant DoubleClick Emediate Facebook Connect Facebook Exchange (FBX) **Facebook Social Plugins** Google AdWords Conversion **Google Analytics Google Tag Manager** Google+ Platform Improve Digital

#### **P9: Missing or Insufficient Session Expiration**

# Automatic session timeout and a highly visible logout button is security state-of-the-art, not for:

#### Where You're Logged In Google • Current Session End All Activity Device Name IE on Windows Location Cluj-Napoca, Cluj, Romania (Approximate) Device Type IE on Windows 7 Facebook If you notice any unfamiliar devices or locations, click 'End Activity' to end the session. Desktop (1) -Amazon End Activity Last Accessed December 1 at 6:57am Device Name Chrome on Windows Location Munich, Bayern, Germany (Approximate) • WEB.DE Sicherheitshinweis Bitte loggen Sie sich immer aus! End Activity Logout Nur durch einen Klick auf "Logout" beenden proximate) Sie Ihre aktuelle Sitzung in Ihrem Postfach und verhindern, dass Unbefugte in Ihre Privatsphäre eindringen können: End Activity Der Logout schließt Ihr Postfach ab und dient zu Ihrer eigenen Sicherheit! WEB.DE Service-Empfehlung: Neue E-Mails direkt im Browser - WEB.DE MailCheck Weiter zum Postfach mit Phishing-Spam-Schutz!

#### Solution:

- Configure to automatically logout after X hours / days
- Obvious logout button
- Educate users



#### Picture sources: facebook.com, web.de

## Outlook

Aiming to receive Lab Project Status



- Currently collection of countermeasures
- Master student wanted (preferred location Munich)
- Spread the Word
  - 22 January 2015: CPDP, Brussels (IPEN panel discussion)
  - 4-6 March 2015: IAPP Global Privacy Summit, Washington
- Regular review of Top 10 Privacy list





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## Backup

| No. | Title   | Frequency | Impact    |
|-----|---|-----------|-----------|
| P1  | Web Application Vulnerabilities                         | High      | Very high |
| P2  | Operator-sided Data Leakage                             | High      | Very high |
| P3  | Insufficient Data Breach Response                       | High      | Very high |
| P4  | Insufficient Deletion of Personal<br>Data               | Very high | High      |
| P5  | Non-transparent Policies, Terms<br>and Conditions       | Very high | High      |
| P6  | Collection of data not required for the primary purpose | Very high | High      |
| P7  | Sharing of Data with Third Party                        | High      | High      |
| P8  | Outdated personal data                                  | High      | Very high |
| P9  | Missing or insufficient Session<br>Expiration           | Medium    | Very high |
| P10 | Insecure Data Transfer                                  | Medium    | ∨ery high |

| No. | Title  | Frequency | Impact | Risk |
|-----|--|-----------|--------|------|
| P1  | Web Application Vulnerabilities                                | 1.9       | 2.8    | 5.32 |
| P2  | Operator-sided Data Leakage                                    | 1.7       | 2.8    | 4.76 |
| P3  | Insufficient Data Breach Response                              | 1.6       | 2.6    | 4.16 |
| P4  | Insufficient Deletion of personal data                         | 2.3       | 1.8    | 4.14 |
| P5  | Non-transparent Policies, Terms and Conditions                 | 2.2       | 1.8    | 3.96 |
| P6  | Collection of data not required for the user-consented purpose |           | 1.8    | 3.78 |
| P7  | Sharing of data with third party                               |           | 2      | 3.6  |
| P8  | Outdated personal data   | 1.6       | 2.2    | 3.52 |
| P9  | Missing or insufficient Session Expiration                     | 1.4       | 2.4    | 3.36 |
| P10 | Insecure Data Transfer   | 1.3       | 2.4    | 3.12 |
| P11 | Inappropriate Policies, Terms and Conditions                   | 1.7       | 1.8    | 3.06 |
| P12 | Transfer or processing through third party                     | 1.6       | 1.8    | 2.88 |
| P13 | Inability of users to modify data                              | 1.3       | 2.2    | 2.86 |
| P14 | Collection without consent                                     | 2         | 1.4    | 2.8  |
| P15 | Collection of incorrect data                                   | 1         | 2.4    | 2.4  |
| P16 | Misleading content   | 1.3       | 1.8    | 2.34 |
| P17 | Problems with getting consent                                  | 1.6       | 1.4    | 2.24 |
| P18 | Unrelated use  | 1.7       | 1.2    | 2.04 |
| P19 | Data Aggregation and Profiling                                 | 1.4       | 1.4    | 1.96 |
| P20 | Form field design issues                                       | 1.2       | 0.6    | 0.72 |

