

# Privacy protection in Wi-Fi analytics systems

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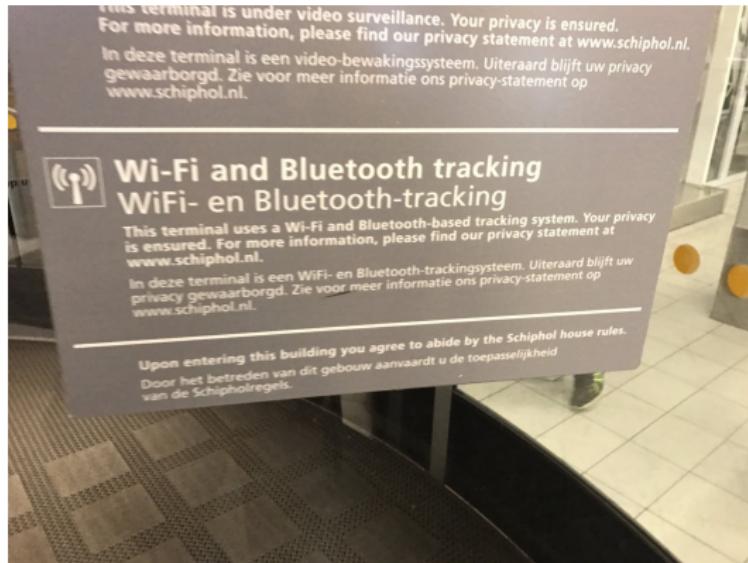


# Privacy protection principles

- Desirable privacy enhancing features in any data collection system
  - User Information
  - Consent & Opt-out
  - Data anonymization

# Information

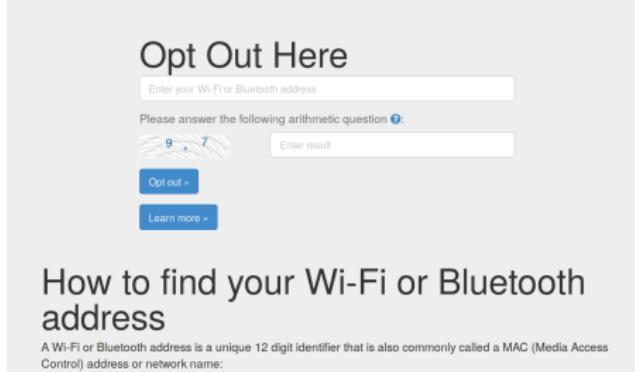
- State of the art subject information in Wi-Fi tracking system<sup>1</sup>



<sup>1</sup><https://twitter.com/kurtopsahl/status/848761831212679170>

# Consent & Opt-out

- Consent is never asked
- Opt-out solutions may be offered
  - e.g. <https://optout.smart-places.org/>



The screenshot shows a web page titled "Opt Out Here". At the top, there is a logo for "SMART PLACE PRIVACY" with the FPF (Future Privacy Forum) seal. Below the title, there is a text input field labeled "Enter your Wi-Fi or Bluetooth address". Underneath it, there is a question "Please answer the following arithmetic question":  $9 + 7$ . To the right of the question is an input field labeled "Enter result". Below the arithmetic question are two buttons: "Opt out" and "Learn more". At the bottom of the page, there is a section titled "How to find your Wi-Fi or Bluetooth address" with a descriptive text about MAC addresses.

Opt Out Here

Enter your Wi-Fi or Bluetooth address

Please answer the following arithmetic question:

$9 + 7$

Enter result

Opt out

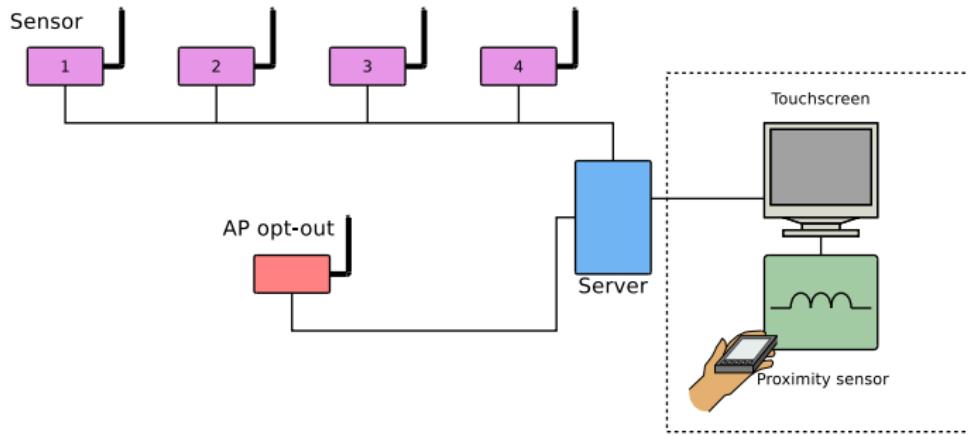
Learn more

How to find your Wi-Fi or Bluetooth address

A Wi-Fi or Bluetooth address is a unique 12 digit identifier that is also commonly called a MAC (Media Access Control) address or network name:

# Wombat

- Wombat: An experimental Wi-Fi tracking system<sup>23</sup>
  - Detect Wi-Fi devices and collect mobility data
  - Deployed as demonstrator at *Cité Des Sciences et de l'Industrie* (Paris) for 1 year<sup>4</sup>



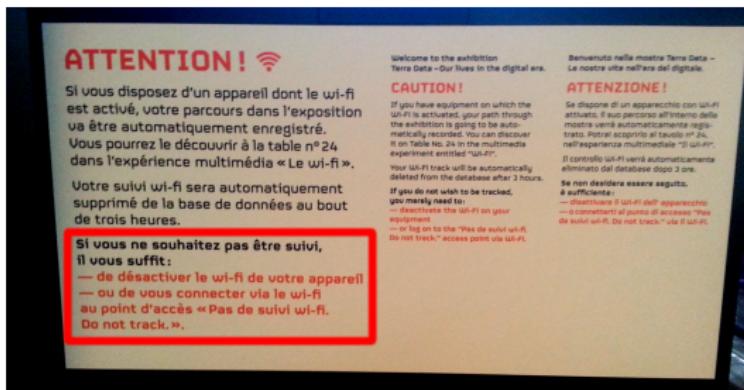
<sup>2</sup>Matte and Cunche, "Wombat: An experimental Wi-Fi tracking system".

<sup>3</sup><https://github.com/Perdu/wombat>

<sup>4</sup><http://www.cite-sciences.fr/fr/au-programme/expos-temporaires/terra-data/> ↗ ↘ ↙

# Wombat: Wi-Fi based opt-out mechanism

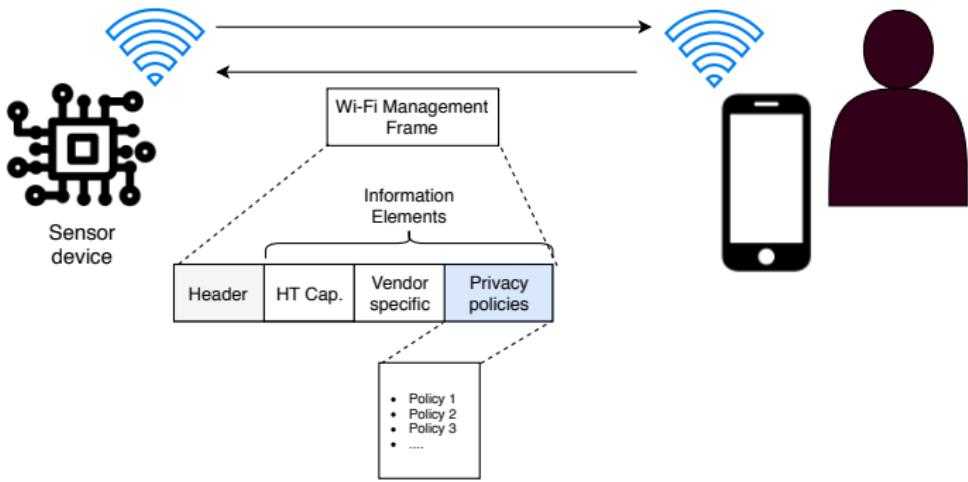
- An opt-out mechanism based on Wi-Fi
  - Dummy AP with explicit SSID, e.g. "Wi-Fi Do not track"
- ① User connect to AP to opt-out
  - ② MAC address of STA collected during Association process
  - ③ MAC address added to a black-list
  - ④ Data coming from black-listed devices is dropped



- Opt-out is not a valid solution under GDPR: prior consent is required
  - e-Privacy directive may relax this requirement
    2. The collection of information emitted by terminal equipment to enable it to connect to another device and, or to network equipment shall be prohibited, except if:
      - (a) it is done exclusively in order to, for the time necessary for, and for the purpose of establishing a connection; or
      - (b) a clear and prominent notice is displayed informing of, at least, the modalities of the collection, its purpose, the person responsible for it and the other information required under Article 13 of Regulation (EU) 2016/679 where personal data are collected, as well as any measure the end-user of the terminal equipment can take to stop or minimise the collection.
  - How to collect consent in the context of Wi-Fi tracking ?

# Framework for information and consent I

- A framework for information and consent in the IoT
  - Leverage discovery mechanism of wireless technologies (802.11, BLE)
  - Tracking system broadcast information
    - Data collected, privacy policies, data controller coordinates ...
    - Data carried in Vendor/Manufacturer specific fields
  - Subject connect to communicate consent



# Framework for information and consent II

- Working prototype based on BLE<sup>5</sup>
  - Data carried in Manufacturer Specific AD elements
  - [https://github.com/cunchem/BLE\\_Privacy\\_Beacon](https://github.com/cunchem/BLE_Privacy_Beacon)

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<sup>5</sup>Cunche, Métayer, and Morel, "A Generic Information and Consent Framework for the IoT" ↗ ↘ ↙ ↛ ↚ ↜

# Data anonymization

- Wi-Fi presence data should must be anonymized

Time	Location	MAC
12:09	A-4	00:11:11:11:11:11
12:12	B-4	00:11:11:11:11:11
12:13	E-5	00:22:22:22:22:22
12:13	F-4	00:33:33:33:33:33
12:14	B-4	00:11:11:11:11:11



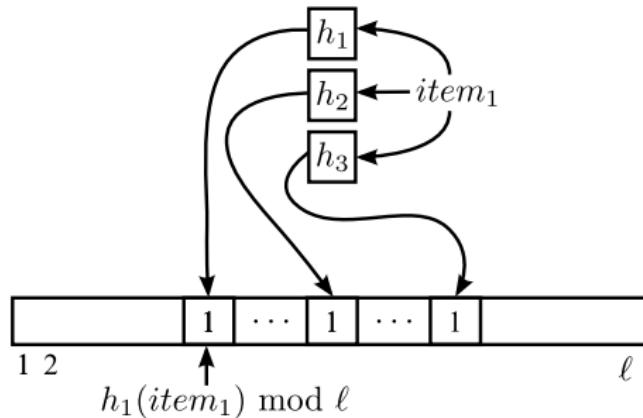
Time	Location	Hash (md5)
12:09	A-4	fb2d5084c0ad1fdf6c29fe2aa323b758
12:12	B-4	fb2d5084c0ad1fdf6c29fe2aa323b758
12:13	E-5	69dc015b56448651561e1a4301ac9b4d
12:13	F-4	07024831442e8b86a06e905fd4d391ce
12:14	B-4	fb2d5084c0ad1fdf6c29fe2aa323b758

- Hash based techniques do not work
  - Simple hashing can be reversed<sup>6</sup>
  - Keyed-hashing not satisfactory
    - Key location, lifetime ...

<sup>6</sup>Demir, Cunche, and Lauradoux, "Analysing the privacy policies of Wi-Fi trackers".

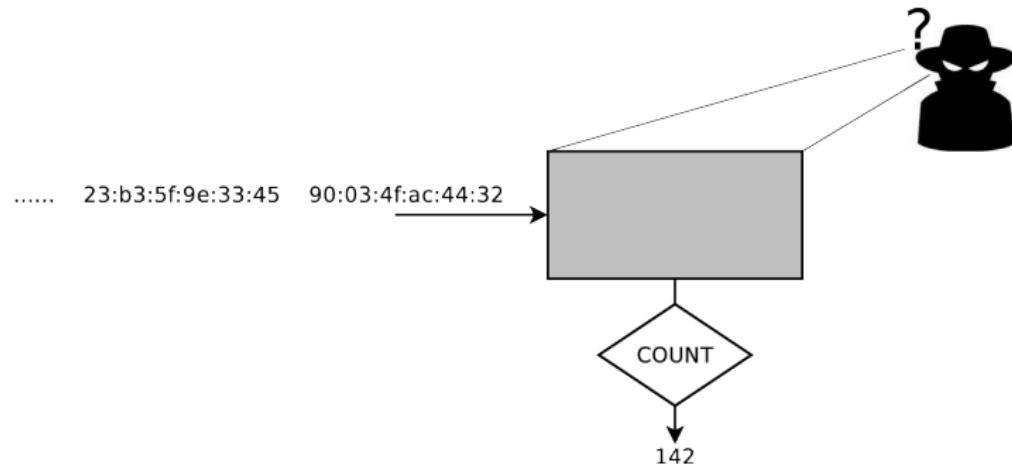
# Data anonymization I

- Datastructures with Differential Privacy<sup>7</sup>
  - Bloom-Filter supporting cardinal estimation
  - Perturbation to enforce Differential Privacy

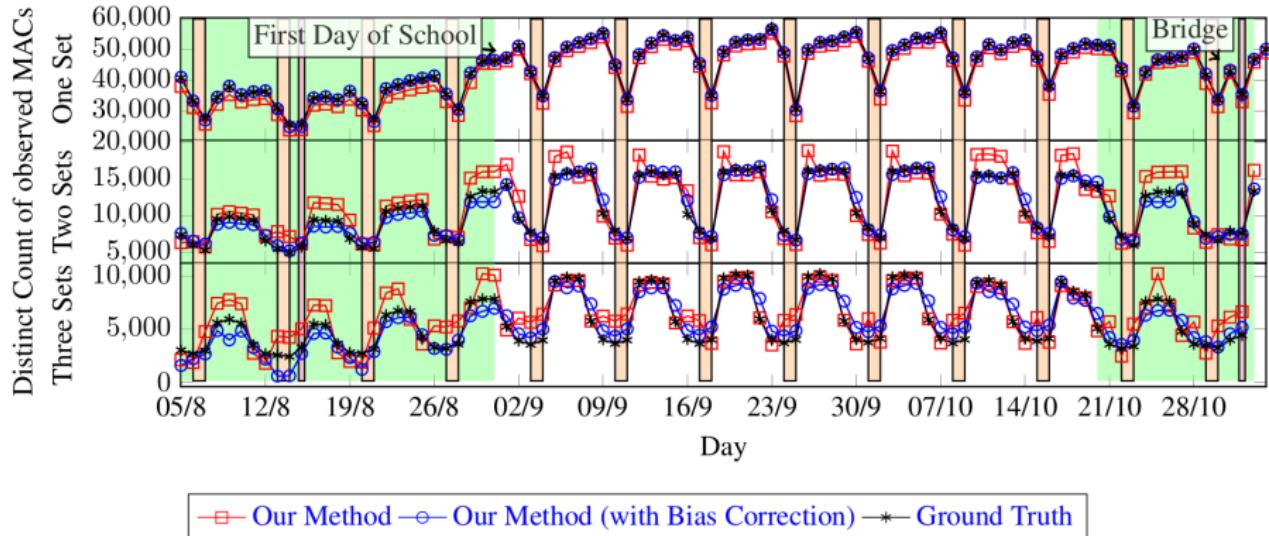


# Data anonymization II

- No information about single identifiers can be learned from the datastructure



# Data anonymization III



# Conclusion

- Strong privacy requirements (GDPR ...)
- May seem difficult or impossible to implement
- But technical solutions may be possible ...
- Some are currently being developed
  - Exception in regulations are not necessarily required (e.g. ePrivacy 8-b)

# Bibliography

- Levent Demir, Mathieu Cunche, and Cédric Lauradoux. "Analysing the privacy policies of Wi-Fi trackers". In: *Workshop on Physical Analytics*. Bretton Woods, United States: ACM, June 2014. doi: [10.1145/2611264.2611266](https://doi.org/10.1145/2611264.2611266)
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Thank you

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