

CANON Webinar

ICO guidance on

anonymisation and

pseudonymisation

Paul Comerford
Anonymisation & Encryption team
Technology





Anonymisation

Download options

Search this document



Anonymisation

About this guidance

Introduction to anonymisation

How do we ensure anonymisation is effective?

Pseudonymisation

What accountability and governance measures do we need?

Glossary

Case studies on pseudonymisation and anonymisation techniques

Case study: pseudonymising employee data for recruitment analytics

Case study: trusted third parties for market insights

Contents

- [About this guidance](#)
 - [Why have you produced this guidance?](#)
 - [What is this guidance about?](#)
 - [Who is this guidance for?](#)
 - [How is this guidance structured?](#)
- [Introduction to anonymisation](#)
 - [What is personal data?](#)
 - [What is anonymous information?](#)
 - [What is anonymisation?](#)
 - [Is anonymisation always necessary?](#)
 - [Is anonymisation always possible?](#)
 - [What are the benefits of anonymisation?](#)
 - [If we anonymise personal data, does this count as processing?](#)
 - [What is the difference between anonymisation and pseudonymisation?](#)
 - [What about 'de-identified' personal data?](#)
- [How do we ensure anonymisation is effective?](#)
 - [What should our anonymisation process achieve?](#)

Our anonymisation and pseudonymisation guidance

What is anonymous information?

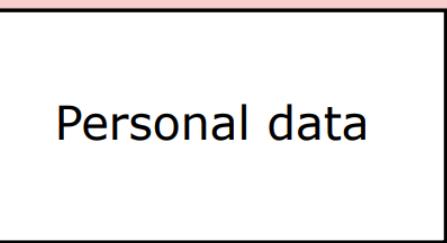
Recital 26 of the UK GDPR

“...information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.”

What is anonymisation?



Anonymisation as Processing



Processing of personal data

Anonymous
information

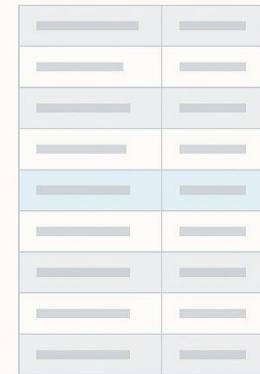
**UK GDPR does
not apply**

What are the key indicators of identifiability?

Dataset

Singling out

Dataset A



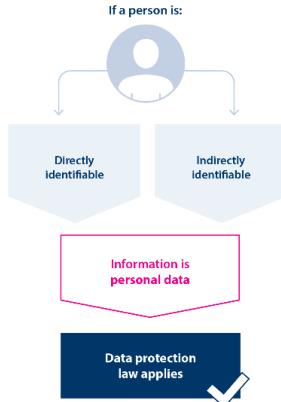
Dataset B



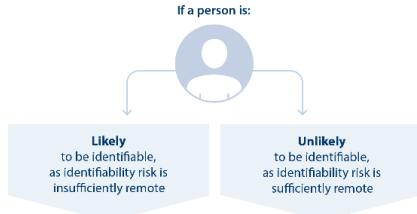
Linkability

What is the “spectrum of identifiability”?

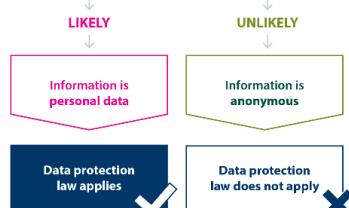
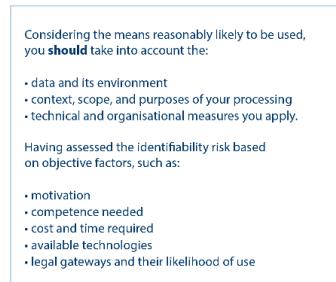
Personal data



Anonymous information



(But keep under review, as appropriate)



(But keep under review, as appropriate)

Whose hands

- the status of the information in the different 'hands' of those who process it – 'whose hands'
- If you share pseudonymised data (but not the additional information) with another organisation, it may be anonymous information in their hands
- only applies when disclosing information to an organisation who is not a joint controller or processor
- In these cases, you **should** use pseudonymisation techniques.

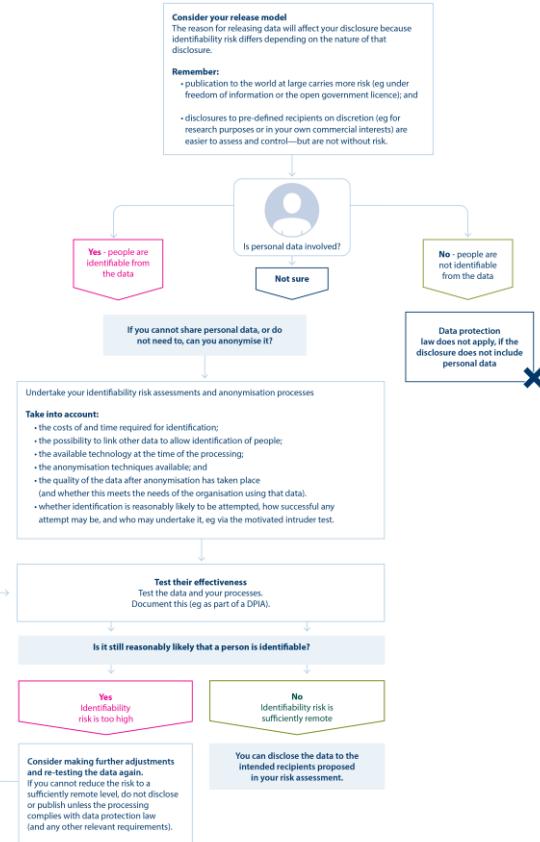
Can we anonymise within our organisation?

- you **could** either:
- anonymise the information for other purposes; or
- pseudonymise it for the purpose of general analysis.
- If you choose to anonymise personal data, you **must** not retain any additional information within your organisation that would allow identification.
- For example, the original personal data or other datasets that may be used to re-identify someone.

The “motivated intruder” test?



How do we decide when and how to release data?



Pseudonymisation

- Pseudonymised personal data is in scope of data protection law.
- It can help you to reduce the risks your processing poses:
- implement data protection by design;
- ensure appropriate security; and
- make better use of personal data (eg for research purposes and general analysis).

How should we ensure transparency?

- tell people why you anonymise personal data;
- describe how you do this, in accessible terms;
- say what safeguards are in place to minimise the risks of anonymising personal data

Future work

- Anonymisation and pseudonymisation for research
- Coming 2026
- More case studies

Thank you! - Questions

Paul Comerford
Anonymisation & Encryption team
anonymisation@ico.org.uk

ico.org.uk