

CANON Webinar

ICO guidance on anonymisation and pseudonymisation

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Technology

For organisations / UK GDPR guidance and resources / Data sharing / Anonymisation

Anonymisation

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How do we ensure anonymisation is effective?

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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

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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

Personal data



Anonymisation



Anonymous information

Processing of personal data

UK GDPR does not apply

What are the key indicators of identifiability?

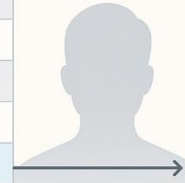
Dataset

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_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
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_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

Singling out

Dataset A

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_____	_____
_____	_____
_____	_____
_____	_____
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Dataset B

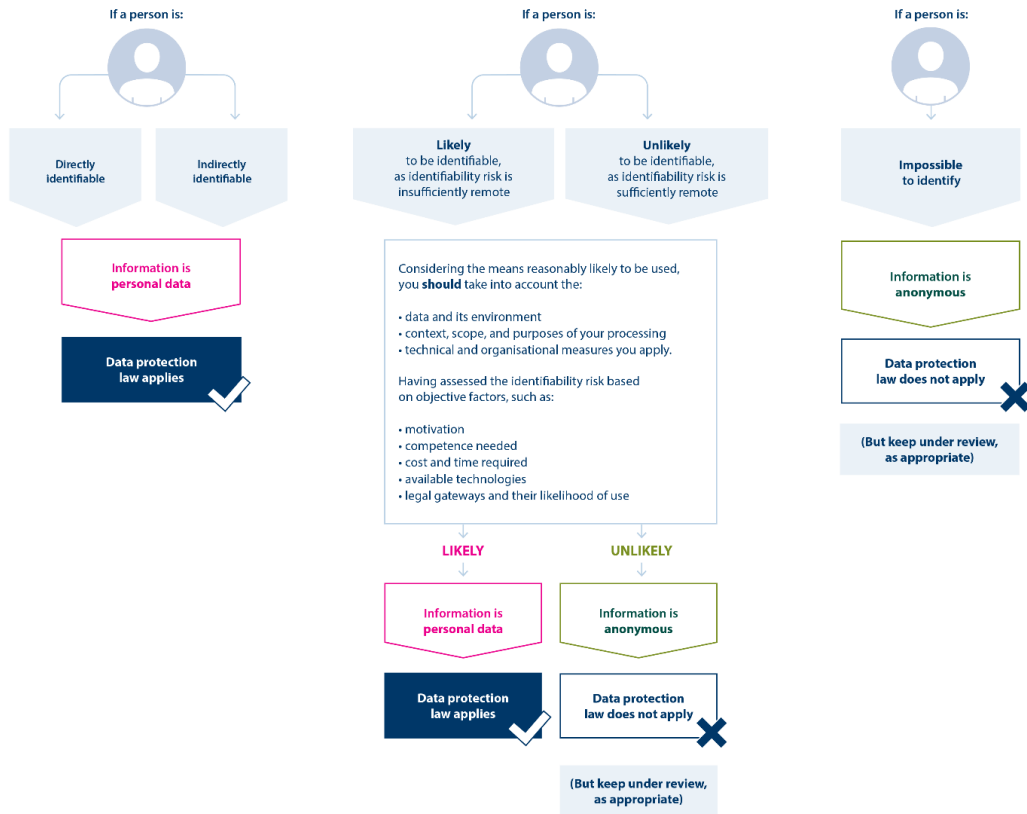
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Linkability

What is the “spectrum of identifiability”?

Personal data

Anonymous information



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.

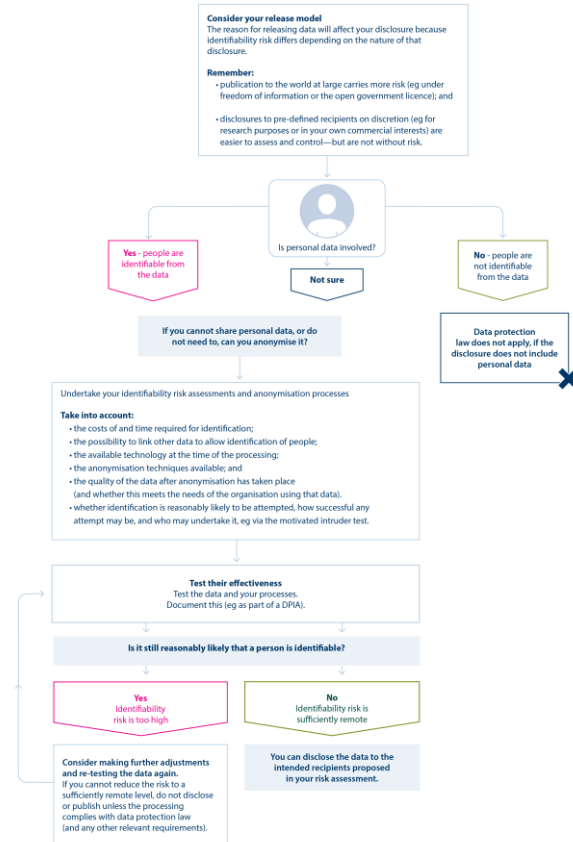
Can we anonymise within our organisation?

- 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

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