

Dynamic Duo – Privacy Threat Modeling and Context Diagramming in the SDLC

Denise Schoeneich Intel Corporation

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Jonathan Fox Cisco Corporation

Jason Cronk Privacy and Trust Consultant Enterprise Consulting Group



Speaker



Denise Schoeneich

Privacy Engineer Intel Corporation

Denise is responsible to ensure appropriate and timely privacy solutions are engineered into the AI data lifecycle. IAPP FIP, CIPP/US, CIPT, CIPM



Speaker



Jonathan Fox
Director, Privacy Engineering
Cisco Corporation

Jonathan is a member of Cisco's Chief Privacy
Office and co-author of the upcoming <u>The</u>
Privacy Engineer's Companion: A Workbook of
Guidance, Tools, Methodologies, and
<u>Templates.</u>



Speaker



Jason Cronk

Privacy and Trust Consultant Enterprise Consulting Group

Author, <u>Strategic Privacy by Design</u>
Licensed Attorney in Florida, PbD Ambassador, IAPP FIP, CIPP/US, CIPT, CIPM



Dynamic Duo – Privacy Threat Modeling and Context Diagramming in the SDLC



Purpose of Session

Privacy by Design (PbD) prioritizes privacy in the initial design stages and throughout the development lifecycle. Privacy threat modeling and context diagramming can be used as an approach to implement PbD in the SDLC.

Main Sections

- Privacy Engineering
- Secure Development Lifecycle (SDL)
- Privacy Threat Modeling
- Privacy Context Diagram
- Privacy Requirements & Validation

Invite Questions

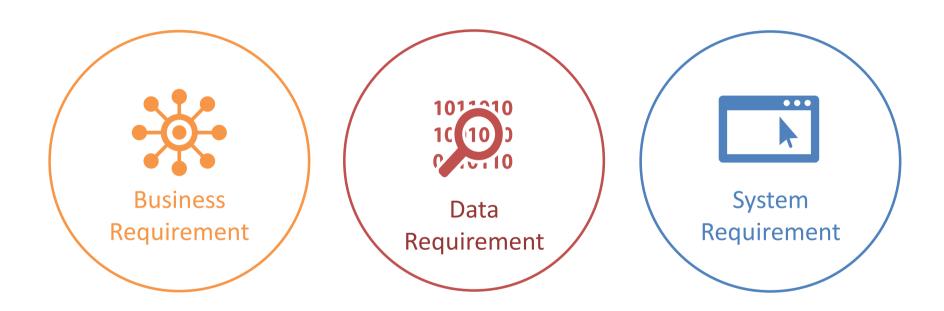
Privacy Engineering

Overview of privacy engineering including privacy engineering development process



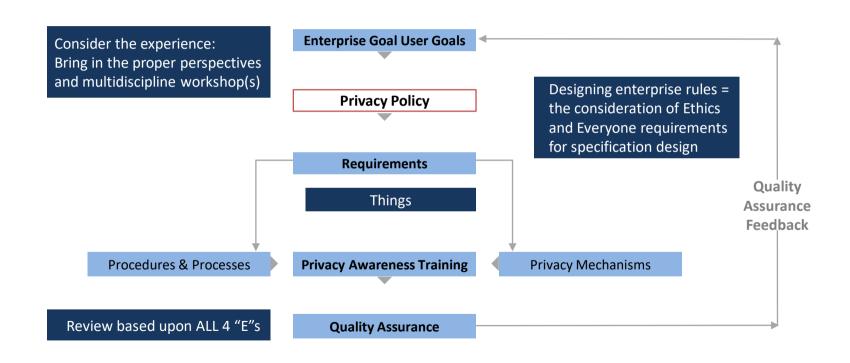
Requirements cross multiple layers... Privacy+ Security Forum





Privacy Engineering Development Process



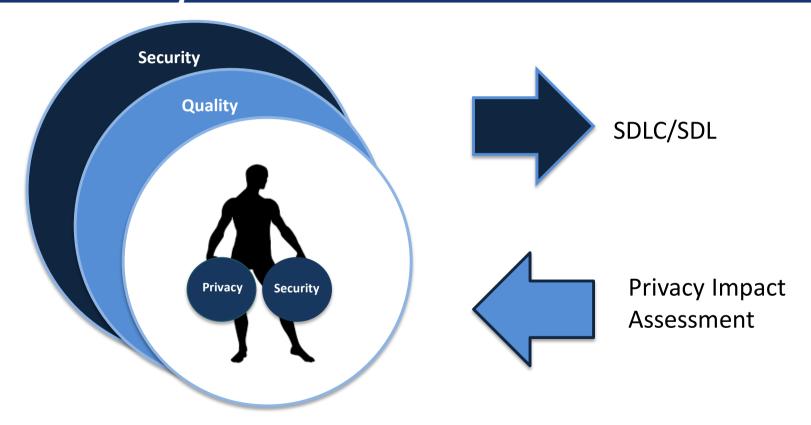


Secure Development Lifecycle (SDL)

Relationship of privacy, security and quality and SDL mapped to the SDLC

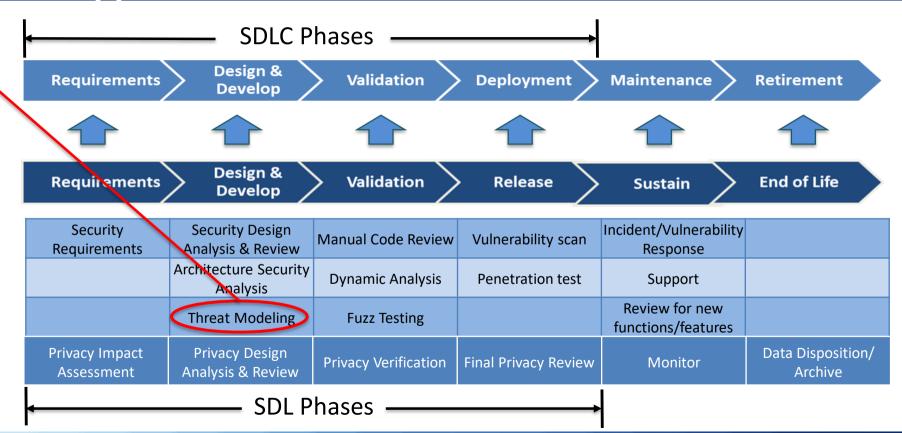


Privacy Engineering Requires Both Quality Privacy Security Forum



Secure Development Lifecycle (SDL) Mapped to the SDLC





Privacy Threat Modeling

How threats pose risk to privacy, who are threat actors in a privacy context, and frameworks for modeling privacy risks



What is a threat?





Is a bald tire a threat?

Threat car looses traction swing breaks

Bald tire is a Vulnerability

How Threats Impose Risk





Likelihood of threat exploiting a vulnerability and severity of resulting consequences

Threat Actors









Persons

Organizations

Governments

		va		

Revenge, money, spite, curiosity, & control.	Money & competitive advantage.	Law enforcement, espionage, control & repression.	
Solo			
Amateur	Small	Local	
Professional	Medium	Regional	
Organized criminal	Large	Nation-state	
Crowds/mobs	Multi-national	Industrialized	
	FAMGA	Superpower	

Rank

(skills & resources)

Compliance Model



Most compliance models presume a certain type of threat actor



External to the organization



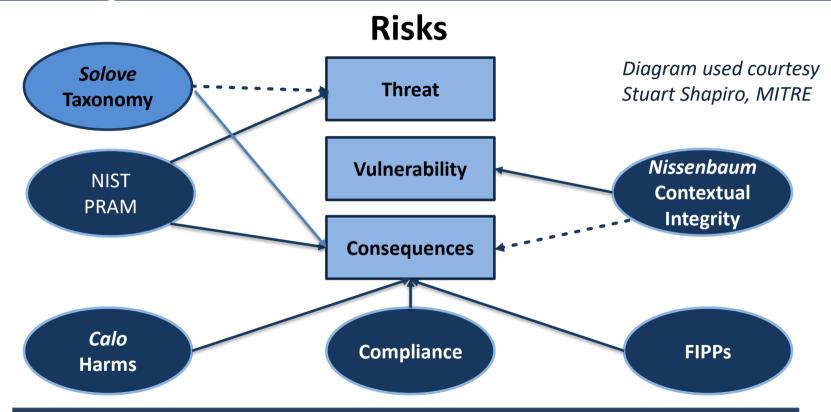
Contrary to the organization's interests



 Some include the organization (FCRA, GDPR, CAN-SPAM)

Different Frameworks for Modeling Privacy





Privacy Controls



NIST SP 800-53 Families

- Authority and Purpose
- Accountability, Audit and Risk
 Management
- Data Quality and Integrity
- Data Minimization and Retention
- Individual Participation and Redress
- Security
- Transparency
- Use Limitation

Hoepman Privacy Design Strategies

- MINIMIZE
- SEPARATE
- ABSTRACT
- HIDE
- ENFORCE
- DEMONSTRATE
- INFORM
- CONTROL

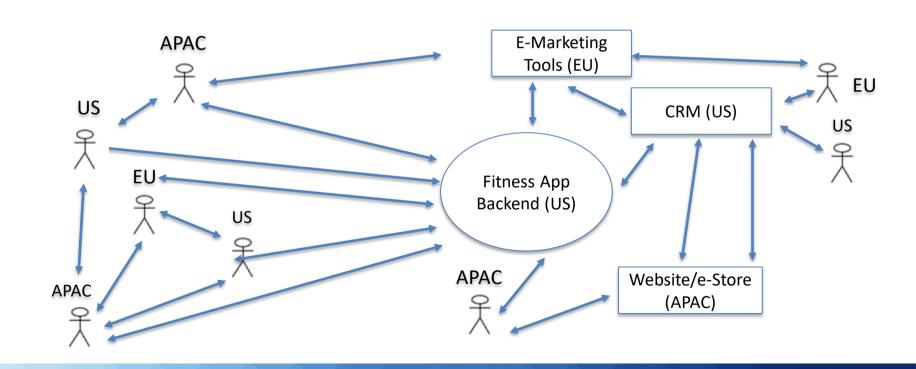
Privacy Context Diagram

How to build a context diagram and layer in threats and controls



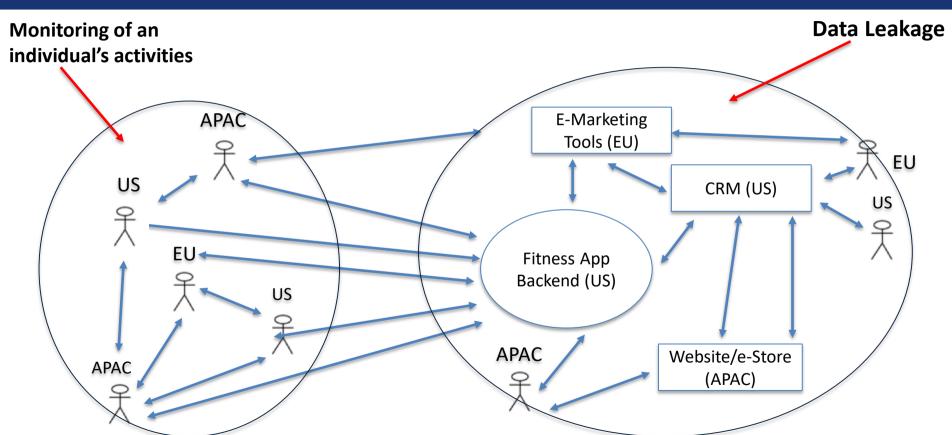
Build of a Context Diagram





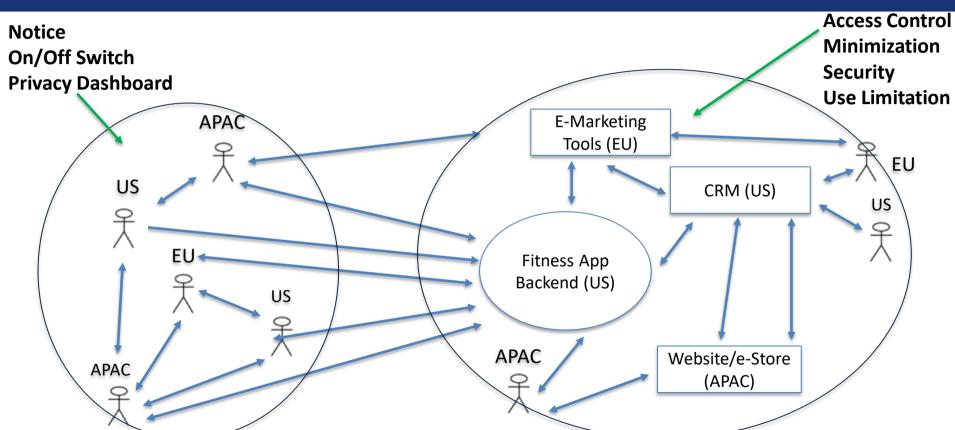
Layer in Threats





Layer in Controls





Privacy Requirements & Validation

User stories make discussions more concrete and Agile definition of "Done" drives the validation of privacy requirements



User stories make discussion concrete

Privacy+ Security Forum

- **Title:** Fitness App allows user to share exercise/fitness activities
 - As a fitness app user
 - I want to share my exercise activities

Requirement

- So that my personal trainer can monitor my progress and keep me accountable
- Scenario: User allows personal trainer to view exercise activities
 - Given exercise logs are private by default

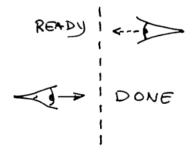
Acceptance Criteria

- When I change my exercise logs setting
- Then my personal trainer can view my exercise logs and add comments

Privacy Validation



- Privacy definition of "Done"
- Trust but Verify > Show Me
- Final privacy review. "Go Live" sign-off



Hands-on Exercise

Apply session information



Threat Model CHARETTEE



Scenario

Shop til' you drop

Design a supermarket app that creates shopping lists based on shopping history, maps user's path in the store, and directs user to bargains (i.e., ties into supermarket's affinity program).

- Identify two possible threats (and threat actors)
- Identify possible consequences of one of the threats
- Identify controls to mitigate the threats

Note: Business model is advertising and data monetization

Resources



Questions + Contact





Denise Schoeneich
Privacy Engineer

Intel Corporation
Denise.Schoeneich@intel.com



Jason Cronk
Privacy and Trust Consultant

Enterprise Consulting Group rjc@enterprivacy.com

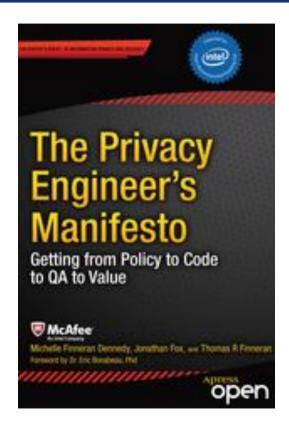


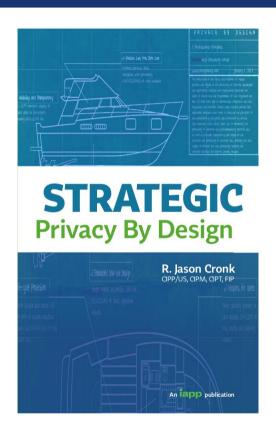
Jonathan FoxDirector, Privacy Engineering

Cisco Corporation Jonafox@cisco.com

Shameless Self-promotion







Resources



- Annex Guide to Privacy by Design Privacy by Design Documentation for Software Engineers Version 1.0 (OASIS)
- Architecture of Privacy (O'Reilly Media)
- <u>Clear Acceptance Criteria and Why They're Important</u> (RubyGarage)
- Core Software Security: Security at the Source (CRC Press)
- <u>Linddun Privacy Threat Modeling</u> (LINDDUN)
- <u>P7002 Data Privacy Process</u> (IEEE Standards Association) Under development
- Privacy and Data Protection by Design (ENISA)
- <u>Privacy Design Strategies</u> (Institute for Computing and Information Sciences)
- <u>Privacy Engineering</u>, A Data Flow and Ontological Approach (CreateSpace)
- Privacy Engineering & Assurance (IAPP)
- Privacy Engineer's Manifesto (Apress)
- <u>Privacy Requirements Definition and Testing</u> (MITRE)
- <u>Strategic Privacy by Design</u> (IAPP)
- <u>Taxonomy of Privacy</u> (University of Pennsylvania Law Review)
- <u>User stories examples and usage</u> (AppChance)