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Pseudonymization & Anonymization under the GDPR



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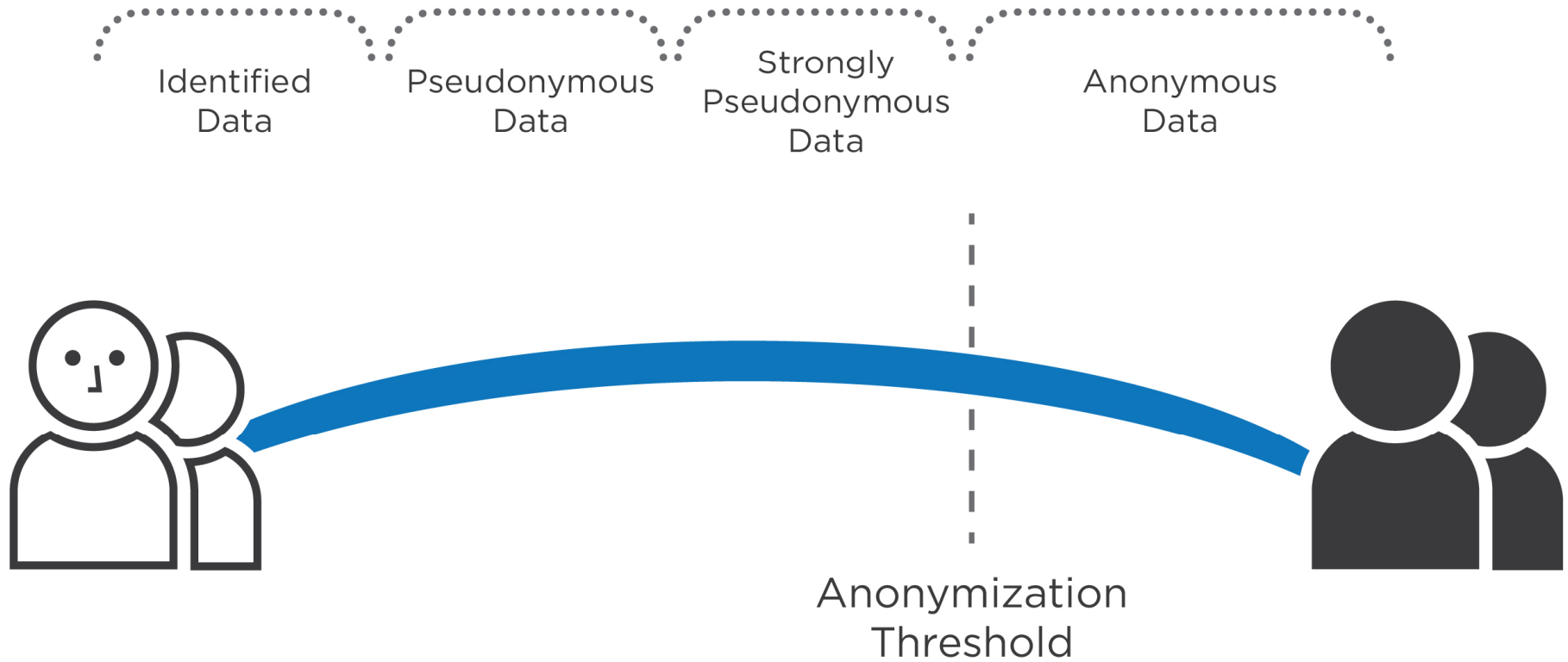
Comparing the Benefits of Pseudonymization and Anonymization Under the GDPR

*Mike Hintze
Khaled El Emam*

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Identifiability Spectrum



GDPR Perspective

GDPR Obligation	Identified	Pseudonymized (Basic)	Strongly Pseudonymized	Anonymized
1. Provide notice to data subject	Required	Required	Required	Not Required
2. Obtain consent or have another legal basis	Required	Potentially helps	Helps Substantially	Not Required
3. Data subject rights (access, portability, rectification...)	Required	Required	Not Required	Not Required
4. Give right to erasure / right to be forgotten	Required	Required	May Not be Required	Not Required
5. Basis for cross-border transfers	Required	Required	Required	Not Required
6. Data protection by design	Required	Partially met	Strengthens the ability to meet this obligation	Not Required
7. Data security	Required	Partially met	Strengthens the ability to meet this obligation	Not Required
8. Data breach notification	Likely to be required	Less likely to be required	Strengthens the case that notification is not required	Not Required
9. Data retention limitations	Required	Required	Required	Not Required
10. Documentation / recordkeeping obligations	Required	Required	Required	Not Required
11. Vendor / sub-processor management	Required	Required	Required	Not Required