Policy-driven distributed data processing and the AMdEX data exchange

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With: Cees de Laat, Leon Gommans, Paola Grosso, Sander Klous, Tom van Engers, Wouter Los, and Christopher Esterhuyse, Milen Girma Kebede, Lu-Chi Liu, Mostafa Mohajeri Parizi, Merrick Oost-Rosengren

May 15, 2024



Regulated data exchange:

Data exchange systems governed by regulations, agreements and policies

as an instance of

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software systems with embedded regulatory services derived from legal/regulatory specifications that monitor and/or enforce compliance

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Requirement analysis

- Goal: systems with legally justifiable data exchange actions (sharing, processing)
- Solution ingredients: high-level specification, enforcement strategies, access and usage control, static and runtime verification

Section 1

Policy-driven data exchange @ UvA

Policy Administration and Enforcement



Figure: Simplified XACML architecture – M.S. Ferdous. "User-controlled identity management systems using mobile device". PhD thesis.

Requirements on Administration

- Links between legal text and policy
- Versioning, persistence
- Layered policies, level of abstraction
- Policy reuse, reusable templates
- Usability: registration, selection, ...

Policy Administration and Enforcement



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Requirements on Policy Language

- Connects legal primitives and computational primitives
- Compositional and extensible specifications
- Supports authorisation, scenario checking, simulation, verification

Policy Administration and Enforcement

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Requirements on Enforcement

- Occurs at all stages: "before, during and after processing"
- Ex-ante and ex-post enforcement
- Legal obligations
- Accountable
- Explainable
- Pre- and post-conditions

1

Human-in-the-loop



Regulated systems with ex-post enforcement



Services to Automate Compliance with Ex-post Enforcement". In: Proceedings of AICOL 2023. 2024

Policy reasoning with eFLINT domain-specific language (DSL)

- Formalization of laws and policies
- declarative reasoning about compliance:
- facts, actions and duties
- reactive service for software integration
- designed to satisfy aforementioned requirements
- can be used to generate ODRL rules



L. Thomas van Binsbergen, Lu-Chi Liu, Robert van Doesburg, and Tom M. van Engers. "eFLINT: a domain-specific language for executable norm specifications". In: *Proceedings of the 19th ACM SIGPLAN International Conference on Generative Programming: Concepts and Experiences*. ACM, 2020, pp. 124–136. DOI: 10.1145/3425898.3426958

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Layered policy specification



Rule of law, International, EU and local

Trust eco-system & governance principles for sharing data

Consortium agreements "how we share data"

Conditions for sharing specific data, services, documents, applications

Experiments

- GDPR \longrightarrow Financial sharing agreement \rightarrow Organisational policy
- GDPR \longrightarrow Medical consortium regulatory document \rightarrow Resource-level access control

L. Thomas van Binsbergen, Milen G. Kebede, Joshua Baugh, Tom M. van Engers, and Dannis G. van Vuurden. "Dynamic generation of access control policies from social policies". In: *Proceedings of ICTH 2021*. Vol. 198. Procedia Computer Science. Elsevier, 2021, pp. 140–147. DOI: 10.1016/j.procs.2021.12.221

Reuse – Data exchange archetypes



Sara Shakeri, Lourens Veen, and Paola Grosso. "Evaluation of Container Overlays for Secure Data Sharing".

In: 2020 IEEE 45th LCN Symposium on Emerging Topics in Networking (LCN Symposium). 2020, pp. 99–108.

DOI: 10.1109/LCNSymposium50271.2020.9363266

Section 2

Amsterdam Data Exchange (AMdEX) fieldlab

AMdEX fieldlab overview



L. Thomas van Binsbergen, Merrick Oost-Rosengren, Hayo Schreijer, Freek Dijkstra, and Taco van Dijk. *AMdEX Reference Architecture – version 1.0.0.* Ed. by L. Thomas van Binsbergen. Feb. 2024. DOI: 10.5281/

AMdEX Reference Architecture - roles



Figure: Infrastructural roles

Figure: Member taxonomy



1. **Onboarding**: members get registered and connected via the **Registry**



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- 5. Clearing: authorizations gathered for workflow actions (Enforcement Orchestrator)



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- 6. Processing: workflow actions are triggered and logged (Process Orchestrator)



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- 5. Clearing: authorizations gathered for workflow actions (Enforcement Orchestrator)
- 6. Processing: workflow actions are triggered and logged (Process Orchestrator)
- 7. Auditing: logs are made available (Notary) for ex-post compliance checks (Auditor), and new information can be brought in by an Auditor

A brief look under the hood



A brief look under the hood – Control Plane Interfaces



A brief look under the hood – Data Plane Interfaces



AMdEX fieldlab - main results

Main results and insights

- High-level reference architecture, software services at varying TRLs
- Main selling points: genericity (archetypes), integrated & partially automated governance
- We have identified some important trade-offs:
 - Data privacy and sensitivity versus analytical power
 - Decentralized control versus accountability
 - Auditing requires access to several types of sensitive information

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Next steps

- Consolidation and standardisation, interoperability with EU initiatives, i.e., IDSA and iShare
- AMdEX-DMI project: higher TRLs, research into partially automating auditing
- **Targeted use cases** with specific service providers: synthetic data, secure multi-party computation, federated ML, differential privacy, ...

Some open questions

 How general is our approach? How realistic is it to support generic archetypes? Can we sufficiently standardize to include many types of service providers? Howto secure multi-party computation (sMPC) and federated machine learning (FML)?

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AMdEX-DMI project supported by the National Growthfund Mitecosysteem

- How to trace and audit exchange processes when data, algorithms and logs are sensitive?
- What information is needed for auditing, and are service providers willing to share? Can we handle logging information as 'just another' sensitive data asset? Can we identify 'levels of accountability' to be recorded in agreements?

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