

Efficient Comparison of Enterprise Privacy Policies

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ABSTRACT

Enterprise privacy policies often reflect different legal regulations, promises made to customers, as well as more restrictive enterprise-internal practices. The notion of policy refinement is fundamental for privacy policies, as it allows one to check whether a company's policy fulfills regulations or adheres to standards set by customer organizations, to realize the "sticky policy paradigm" that addresses transferring data from one realm to another in a privacy-preserving way, and much more. Although well-established in theory, the problem of how to efficiently check whether one policy refines another has been left open in the privacy policy literature. We present a practical algorithm for this task, concentrating on those aspects that make refinement of privacy policies more difficult than, for example refinement for access control policies, such as a more sophisticated treatment of deny rules and a suitable way for dealing with obligations and conditions on context information.

Categories and Subject Descriptors

C.2.0 [Computer-Communication Network]: General – Security and Protection; K.4.1 [Computer and Society]: Public Policy Issues—Privacy

General Terms

Security, Privacy Policy, Policy Comparison, Algorithm

1. INTRODUCTION

An increasing number of enterprises make privacy promises to customers or, at least in the US and Canada, fall under new privacy regulations. To ensure adherence to these promises and regulations, enterprise privacy technologies are emerging [6]. An important tool for enterprise privacy enforcement is formalized enterprise privacy

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policies [3, 8, 10, 11]. An enterprise privacy policy often reflects different legal regulations, promises made to customers, as well as more restrictive enterprise-internal practices. Furthermore, it may allow customer preferences. Compared with the well-known language P3P [12] intended for privacy promises to customers, languages for the internal privacy practices of enterprises and for technical privacy enforcement must offer more possibilities for fine-grained distinction of users, purposes, etc., as well as a clearer semantics.

The notion of policy refinement is fundamental for many situations in privacy policy management. Intuitively, one policy refines another if using the first policy automatically also fulfills the second policy. For instance, policy refinement enables verification that an enterprise policy fulfills regulations or adheres to standards set by consumer organizations or a self-regulatory body, assuming only that these coarser requirements are also formalized once and for all as a privacy policy. Similarly, it enables verification that a detailed policy for a part of the enterprise (defined by responsibility or by technology) refines the overall privacy policy set by the company's CPO. The verification can be done in the enterprise or by external auditors, such as [14].

Sticky policies [11] are another application of policy refinement: With increasingly dynamic e-business, data is exchanged between enterprises, and enterprise boundaries change due to mergers, acquisitions, or virtual enterprises. After transferring data from the realm of one policy into another (where the transfer must of course be permitted by the first policy), the second realm must enforce the first policy. However, the enforcement mechanisms (both organizational and technical) in the second realm is often not able to deal with arbitrary policies for each set of data obtained. In this case, one realm must perform a refinement test before the data are transferred, i.e., one has to verify that the policy of the second realm refines the policy of the first, at least for the restriction of the first policy to the data types being transferred. This requires compatible enterprise privacy enforcement mechanisms. For these reasons, IBM has recently proposed an Enterprise Privacy Authorization Language (EPAL) [1] as an XML specification for public comments and possible subsequent input to standardization.

Although refinement of privacy policies is well-established in theory [3], an efficient algorithmic solution for checking whether one policy refines another has not yet been addressed. Coming up with such a solution is challenging for three crucial reasons: First, compared to typical access control policies, privacy policies additionally offer a more sophisticated semantics for requests to abstract elements, e.g., an abstract user "department" that is used to group a set of concrete "employees". Requests to such abstract

elements are interpreted in an access control manner, i.e., if the department has at least one employee who is not allowed to perform a specific action, then so is the department as an abstract user. In the representation of the semantics of privacy policies, this formally means that deny rules have to be inherited up the hierarchies. Second, obligations as well as conditions on context information have to be taken into account, which are essential features in enterprise privacy policies. Third, a one-to-one adoption of the definition of policy refinement requires that each element of the first policy we compared with each element of the second one. As rules usually overlap for a large number of such elements, an efficient algorithm ought to identify these elements and compare them as a whole.

The goal of this article is therefore to provide an efficient algorithm for checking refinement of privacy policies in an enterprise. We do this concretely for the IBM EPAL proposal. However, for a scientific paper we cannot use the lengthy XML syntax, but have to use a corresponding abstract syntax, which closely resembles the one presented in [3] (which, like EPAL, is based on [11]).

The core contribution of new privacy-policy languages [8, 10, 11], compared with other access-control languages, is the notion of purpose and purpose-bound collection of data, which is essential to privacy legislation. Other necessary features that prevent enterprises from simply using their existing access-control systems are obligations and conditions on context information. Individually, these features were also considered in recent literature on access control, e.g., purpose hierarchies in [5], obligations in [4, 7, 9, 13], and conditions on context information in [15]. Refinement is a well-established concept to support the incremental specification of security policies, authorization policies [5], and management policies [7]. Whilst significant work has been done in developing policy refinement techniques, the area of (privacy) policy refinement checking has barely been addressed.

2. SYNTAX, SEMANTICS, AND REFINEMENT OF EPAL POLICIES

In this section, we review the abstract syntax and semantics of IBM's EPAL privacy policy language [1], which closely resembles a recently proposed abstract syntax and semantics for the superset of E-P3P Enterprise Privacy Policies in [3]. The main differences are that EPAL does not use rules with priorities as considered in [3] but the simpler representation as an ordered list of rules, and that EPAL policies are additionally equipped with a global condition that has to be satisfied in order to further process a request, as well as with a default obligation.

2.1 Hierarchies, Obligations, and Conditions

For conveniently specifying rules, the data, users, etc. are categorized in EPAL as in many access-control languages. This also applies to the purposes. To allow structured rules with exceptions, categories are ordered in hierarchies; mathematically they are forests, i.e., multiple trees. For instance a user "company" may group several "departments", each containing several "employees". The enterprise can then write rules for the whole "company" with exceptions for some "departments".

DEFINITION 1 (HIERARCHY). A hierarchy is pair $(H, >_H)$ of a finite set H and a transitive, non-reflexive relation $>_H \subseteq H \times H$, where every $h \in H$ has at most one immediate predecessor (parent). As usual we write \geq_H for the reflexive closure. We write $h \geq_H h'$ if $h \geq_H h'$ or $h' \geq_H h$ holds.

For two hierarchies $(H, >_H)$ and $(G, >_G)$, we define

$$\begin{aligned} (H, >_H) \subseteq (G, >_G) & : \iff (H \subseteq G) \wedge (>_H \subseteq >_G); \\ (H, >_H) \cup (G, >_G) & := (H \cup G, (>_H \cup >_G)^*); \end{aligned}$$

where $*$ denotes the transitive closure. Note that a hierarchy union is not always a hierarchy again.

Throughout this paper we often speak of hierarchies as forests, i.e., as sets of trees.

EPAL policies can impose obligations, i.e., duties for the enterprise. Examples are to send a notification to the data subject after each emergency access to medical data, or to delete data after a given time. Obligations are not structured in hierarchies, but by an implication relation. As multiple obligations may imply more than each one individually, we define the implication (which must also be realized in the application domain) on these sets. We also define how this relation interacts with vocabulary extensions.

DEFINITION 2 (OBLIGATION MODEL). An obligation model is a pair (O, \rightarrow_O) of a set O and a relation $\rightarrow_O \subseteq \mathfrak{P}(O) \times \mathfrak{P}(O)$, spoken implies, on the powerset of O , where $\bar{o}_1 \rightarrow_O \bar{o}_2$ for all $\bar{o}_2 \subseteq \bar{o}_1$, i.e., fulfilling a set of obligations implies fulfilling all subsets.

For $O' \supseteq \mathfrak{P}(O)$, we extend the implication to $O' \times \mathfrak{P}(O)$ by $((\bar{o}_1 \rightarrow_O \bar{o}_2) : \iff (\bar{o}_1 \cap \mathfrak{P}(O) \rightarrow_O \bar{o}_2))$.

The decision formalized by a privacy policy can depend on context data. Examples are a person's age or opt-in consent. In EPAL, this is represented by conditions over data in so-called containers [1]. The XML representation of the formulas is taken from [15], which corresponds to a predicate logic without quantifiers. Similar to [3], we formalize the containers as a set of variables with domains, and the conditions as formulas over these variables.

DEFINITION 3 (CONDITION VOCABULARY). A condition vocabulary is a pair $Var = (V, Scope)$ of a finite set V and a function assigning every $x \in V$, called a variable, a set $Scope(x)$, called its scope.

Two condition vocabularies $Var_1 = (V_1, Scope_1)$, $Var_2 = (V_2, Scope_2)$ are compatible if $Scope_1(x) = Scope_2(x)$ for all $x \in V_1 \cap V_2$. For that case, we define their union by $Var_1 \cup Var_2 := (V_1 \cup V_2, Scope_1 \cup Scope_2)$.

In this paper, we do not extend this to a full signature in the sense of logic; i.e., including predicate and function symbols, but we assume a given universe of predicates and functions with fixed domains and semantics. For a condition vocabulary $Var = (V, Scope)$ and for the assume universe of predicates and functions, we let $C(Var)$ denote the set of correctly typed formulas over V . Furthermore, let $\mathfrak{A}ss(Var)$ denote the set of all assignments for the set V into the respective scope, and for $\chi \in \mathfrak{A}ss(Var)$, let $eval_\chi : C(Var) \rightarrow \{\text{true}, \text{false}\}$ denote the evaluation function for conditions given this variable assignment. This is defined by the underlying logic and the assumption that all predicate and function symbols come with a fixed semantics.

For an efficient algorithmic solution of policy refinement, it turns out to be crucial to check whether one condition c_1 satisfies another one c_2 , i.e., whether $eval_\chi(c_1) = \text{true}$ implies $eval_\chi(c_2) = \text{true}$ for every assignment χ . However, as this problem is NP-complete in the number of variables of the considered condition vocabulary, we cannot expect to solve this for all instances. For practical purposes, we therefore restrict our attention to a satisfy relation that is at least correct, i.e., if c_1 and c_2 are contained in the relation then $eval_\chi(c_1) = \text{true}$ implies $eval_\chi(c_2) = \text{true}$.

DEFINITION 4 (SATISFY RELATION). Let Var be a condition vocabulary. A satisfy relation for Var is a relation $\Rightarrow_{Var} \subseteq C(Var) \times C(Var)$. The relation is correct if for any $c_1, c_2 \in C(Var)$, we have $(c_1, c_2) \in \Rightarrow_{Var}$ only if $(\text{eval}_\chi(c_1) = \text{true}) \Rightarrow (\text{eval}_\chi(c_2) = \text{true})$ for all $\chi \in \mathfrak{Ass}(Var)$. If the converse direction holds, we call the relation complete. In the following, we use infix notation for the relation \Rightarrow_{Var} and we omit the subscript Var if it is clear from the context.

For practical purposes, a suitable satisfy relation, which is correct but not necessarily complete, can often be constructed by means of symbolic evaluation.

2.2 Syntax of EPAL Policies

An EPAL policy consists of a vocabulary, a list of authorization rules, a global condition, and a default ruling. The vocabulary defines element hierarchies for data, purposes, users, and actions, as well as the obligation model and the condition vocabulary. Data, users and actions are as in most access control policies, and purposes are an important additional hierarchy for the purpose binding of collected data.

DEFINITION 5 (VOCABULARY). A vocabulary is a tuple $Voc = (UH, DH, PH, AH, Var, OM)$ where UH, DH, PH , and AH are hierarchies called user, data, purpose, and action hierarchy, respectively, Var is a condition vocabulary, and OM an obligation model.

As a naming convention, we assume that the components of a vocabulary called Voc are always called as in Definition 5 with $UH = (U, >_U)$, $DH = (D, >_D)$, $PH = (P, >_P)$, $AH = (A, >_A)$, $Var = (V, Scope)$, and $OM = (O, \rightarrow_O)$, except if explicitly stated otherwise. In a vocabulary called Voc_i all components also get a subscript i , and similarly for superscripts.

The list of authorization rules, short *rule list*, contains rules that allow or deny operations. A rule basically consists of one element from each of the considered hierarchies, a ruling, a condition, and an obligation.

DEFINITION 6 (RULE LIST AND PRIVACY POLICY). A rule list for a vocabulary Voc is a list containing elements of $U \times D \times P \times A \times \{+, \circ, -\} \times C(Var) \times \mathfrak{P}(O)$. For ease of handling, we write a rule $(u, d, p, a, r, c, \bar{o})$ as $\langle (u, d, p, a), (r, c, \bar{o}) \rangle$ and we call (u, d, p, a) the scope and (r, c, \bar{o}) the qualifier of the rule.

A privacy policy or EPAL policy is a tuple $(Voc, R, gc, dr, \bar{d}o)$ of a vocabulary Voc , a rule list R for Voc , a global condition $gc \in C(Var)$, a default ruling $dr \in \{+, \circ, -\}$, and a default obligation $\bar{d}o \in \mathfrak{P}(O)$. The set of these policies is called EPAL, and the subset for a given vocabulary EPAL(Voc).

In EPAL, precedences are contained implicitly by the textual order of the rules. The rulings $+$, \circ , and $-$ mean “allow”, “don’t care”, and “deny”. The ruling \circ was not yet present in [2]. In EPAL, it is called “obligate” because it enables rules that do not make a decision but only impose additional obligations. An example is the rule “Whenever someone tries to access my data, I want to receive a notification”.

For a naming convention, we assume that the components of a privacy policy called Pol are always called as in Definition 6, and if Pol has a sub- or superscript, then so do the components.

2.3 Semantics of EPAL Policies

A request is a tuple (u, d, p, a) , which should belong to the set $U \times D \times P \times A$ for the given vocabulary. Note that EPAL requests

are not restricted to “ground terms” as in some other languages, i.e., minimal elements in the hierarchies. This is useful if one starts with coarse policies and refines them because elements that are initially minimal may later get children. For instance, the individual users in a “department” of an “enterprise” may not be mentioned in the CPO’s privacy policy, but in the department privacy policy. For similar reasons, the semantics is also defined for requests outside the given vocabulary.

DEFINITION 7 (REQUEST). For a vocabulary Voc , $Req(Voc) := U \times D \times P \times A$ is the set of valid requests.

Whether a rule with a satisfied condition matches a given request depends on its ruling. We say that a rule is negative if it has a “deny” ruling, otherwise it is positive. A positive rule matches for a parent of the request (in all hierarchies) including the request itself, i.e., these rules are inherited down the hierarchies. A negative rule also matches if it is specified for a child of the request, i.e., these rules are additionally inherited up the hierarchies. The reason is that the hierarchies are considered groupings; if access is forbidden to an element of a group, it is also forbidden for the group as a whole.

DEFINITION 8 (MATCHING RULE). Let $(u, d, p, a) \square (u', d', p', a')$ iff $u \square u' \wedge d \square d' \wedge p \square p' \wedge a \square a'$ for $\square \in \{\geq, \succ\}$. A positive (negative) rule $\langle (u, d, p, a), (r, c, \bar{o}) \rangle$ matches a request (u', d', p', a') iff $(u, d, p, a) \geq (u', d', p', a')$ ($(u, d, p, a) \succ (u', d', p', a')$).

The semantics of a privacy policy Pol is a function eval_{Pol} , given in Algorithm 1, that evaluates a request based on a given assignment and returns the result (r, \bar{o}) of a ruling (decision) and associated obligations. If the request is not valid for the considered vocabulary or the global condition is satisfied under the given assignment then the result is $(\text{scope_error}, \emptyset)$ or $(\text{policy_error}, \emptyset)$, respectively. Otherwise, the output ruling is determined by the first matching rule with ‘allow’ or ‘deny’ ruling and whose condition is satisfied. If no such rule exists, the default ruling applies. The obligations of preceding obligate rules whose conditions are satisfied are added to the result.

```

Input: A policy  $Pol = (Voc, R, gc, dr, \bar{d}o)$ , request  $req = (u_R, d_R, p_R, a_R)$  and assignment  $\chi \in \mathfrak{Ass}(Var)$ 
Output:  $\text{eval}_{Pol}(req, \chi) \in \{(\text{scope\_error}, \emptyset), (\text{policy\_error}, \emptyset)\} \cup \{+, \circ, -\} \times O$ 
if  $(u_R, d_R, p_R, a_R) \notin U \times D \times P \times A$  then return  $(\text{scope\_error}, \emptyset)$ 
if  $\text{eval}_\chi(gc) = \text{false}$  then return  $(\text{policy\_error}, \emptyset)$ 
 $\bar{o}_{add} := \emptyset$ 
foreach  $\langle (u, d, p, a), (r, c, \bar{o}) \rangle \in R$  do
  if  $\text{eval}_\chi(c) = \text{true}$  then
    if  $r = + \wedge (u, d, p, a) \geq (u_R, d_R, p_R, a_R)$  then return  $(r, \bar{o} \cup \bar{o}_{add})$ 
    if  $r = - \wedge (u, d, p, a) \succ (u_R, d_R, p_R, a_R)$  then return  $(r, \bar{o} \cup \bar{o}_{add})$ 
    if  $r = \circ \wedge (u, d, p, a) \geq (u_R, d_R, p_R, a_R)$  then
       $\bar{o}_{add} = \bar{o}_{add} \cup \bar{o}$ 
return  $(dr, \bar{o}_{add} \cup \bar{d}o)$ 

```

Algorithm 1: Request evaluation.

2.4 Refinement of Privacy Policies

Refinement is the foundation of almost all operations on policies. Our notion of refinement allows policy Pol_2 to define a ruling if Pol_1 does not care. Additionally, it is allowed to extend the scope

of the original policy and to define arbitrary rules for the new elements. In all other cases, the rulings of both policies must be identical. For new elements, however, we have to capture that if they are appended to the existing hierarchies, there could exist applicable rules for these elements if they were already present, and newly added rules for these elements could influence existing elements as well. As an example, a rule for a “department” may forbid its “employees” to access certain data for marketing purposes. Now if a new employee is added, this rule should be applicable as well; furthermore, defining a new rule for this case with higher precedence, e.g., granting the new employee an exception to the department’s rule should obviously no longer yield a refinement. In our definition of refinement, we therefore do not evaluate each policy on its own vocabulary but on the joint vocabulary of both policies. One technicality that has to be accommodated is that joining two vocabularies, i.e., joining their respective hierarchies, might not yield another vocabulary. Hence, we only define refinement for policies with compatible vocabularies, i.e., those policies for which joining their respective vocabularies pair-wise yields another vocabulary.

Dealing with the respective obligations is somewhat more difficult. Intuitively, one wants to express that a finer policy may also contain refined obligations. However, since a refined policy might contain additional obligations, whereas some others have been omitted, it is not possible to simply compare these obligations in the obligation model of the original policy. (Recall that we also use refinement to compare arbitrary policies; hence one cannot simply expect that all vocabulary parts of the refined policy are supersets of those of the coarser policy.) The following notion of obligation refinement is from [3].

DEFINITION 9 (OBLIGATION REFINEMENT). *Let two obligation models (O_i, \rightarrow_{O_i}) and $\bar{o}_i \subseteq O_i$ for $i = 1, 2$ be given. Then \bar{o}_2 is a refinement of \bar{o}_1 , written $\bar{o}_2 \prec \bar{o}_1$, iff the following holds:*

$$\exists \bar{o} \subseteq O_1 \cap O_2 : \bar{o}_2 \rightarrow_{O_2} \bar{o} \rightarrow_{O_1} \bar{o}_1.$$

We are now ready to introduce our notion of policy refinement.

DEFINITION 10 (POLICY REFINEMENT). *Let two privacy policies $Pol_i = (Voc_i, R_i, gc_i, dr_i, \bar{d}o_i)$ for $i = 1, 2$ with compatible vocabularies be given, and set $Pol_i^* = (Voc_i^*, R_i, gc_i, dr_i, \bar{d}o_i)$ for $i = 1, 2$, where $Voc_i^* = (UH_1 \cup UH_2, DH_1 \cup DH_2, PH_1 \cup PH_2, AH_1 \cup AH_2, Var_i, OM_i)$. Then Pol_2 is a refinement of Pol_1 , written $Pol_2 \prec Pol_1$, iff for every assignment $\chi \in \mathcal{A}ss(Var_1 \cup Var_2)$ and every authorization request $q \in Req$ one of the following statements holds, where $(r_i, \bar{o}_i) = eval_{Pol_i^*}(q, \chi)$ for $i = 1, 2$:*

- $(r_1, \bar{o}_1) = (scope_error, \emptyset)$.
- If $eval_\chi(gc_1) = false$ then also $eval_\chi(gc_2) = false$.
- $r_1 \in \{+, -\}$ and $r_2 = r_1$ and $\bar{o}_2 \prec \bar{o}_1$.
- $r_1 = \circ$ and $r_2 \in \{+, \circ, -\}$ and $\bar{o}_2 \prec \bar{o}_1$.

The trivial solution for implementing policy refinement is the brute force approach, i.e., one simply evaluates both policies for any request and any assignment, and compares the results. Clearly, a brute force search is not desirable, and we can identify three inherent weaknesses of this approach that we address in our algorithm.

First, the processing is performed for all elements of the joint set of valid requests. If several requests have exactly the same matching rules in the rule list, it would be beneficial to group these quadruples together and perform a single processing for all of them. Second, in order to cover all the combinations of conditions that could be satisfied by a given request, the brute force algorithm has

to consider all the possible subsets of the sets of conditions defined in the two compared policies. However, it might be that some subsets do not have to be considered because several conditions cannot be satisfied at the same time. It could hence be beneficial to restructure the set of rules with respect to their conditions. Finally, several rules are typically useless for a particular request and assignment because they are always hidden by matching rules that have higher priority. One should hence restructure the rule list in a suitable way. We address these weaknesses in the next section.

3. SCOPE-BASED POLICY COMPARISON

This section describes our algorithm for policy refinement, called *scope-based policy comparison*, which consists of four parts:

1. The *scope-based expansion* transforms the rule list of a policy into an ordered list of so-called scope-based rules. In contrast to usual rules, scope-based rules consist of a sequence of qualifiers instead of a single qualifier. The derived list of rules is equivalent to the old one in the sense that the evaluation of each request results in the same output for each possible assignment. However, the derived list enjoys a property that is crucial for the correctness of the following phases, namely that rules that are matching for only a small number of elements come first.
2. Given two such policies with ordered lists of scope-based rules, we *normalize* the qualifier sequences of each rule according to a simple calculus. The essential ideas are to eliminate qualifiers with obligate ruling by accumulating the respective obligations and to close the sequence, if necessary, with the qualifier $(dr, true, \bar{d}o)$.
3. After the two previous parts, which are used for pre-processing policies, we now show how to efficiently check whether two normalized qualifier sequences are refining in the sense that for every assignment, both sequences yield the same output and one policy always yields refined obligations.
4. We finally show how to efficiently check for refinement between two policies that have scope-based rule lists with normalized qualifier sequences.

In the following, we decided not to present a precise description of the algorithm including all the tedious details that it has to accommodate, both for reasons of readability and for space constraints, but we illustrate its different parts by means of examples instead. However, the precise definition of the algorithm can easily be derived from our description.

3.1 Scope-based Expansion

An important prerequisite for scope-based rules is the notion of *extended rules*. Instead of having only one qualifier, an extended rule may have a sequence of qualifiers. For example, a rule $\langle (u, d, p, a), (r_1, c_1, \bar{o}_1) \rangle$ followed by another rule $\langle (u, d, p, a), (r_2, c_2, \bar{o}_2) \rangle$ can be described by the extended rule $\langle (u, d, p, a), \langle (r_1, c_1, \bar{o}_1); (r_2, c_2, \bar{o}_2) \rangle \rangle$, where evaluation of qualifiers is from left to right and thus respects the precedences of the original rules.

Note that for positive rules, all elements affected by such a rule can easily be represented by their parent element, i.e., the element that the rule is defined for. In contrast, deny rules do not have such a compact representation because upward inheritance prevents us from describing all affected elements by means of a single element. However, we can describe a deny rule for an element (u, d, p, a)

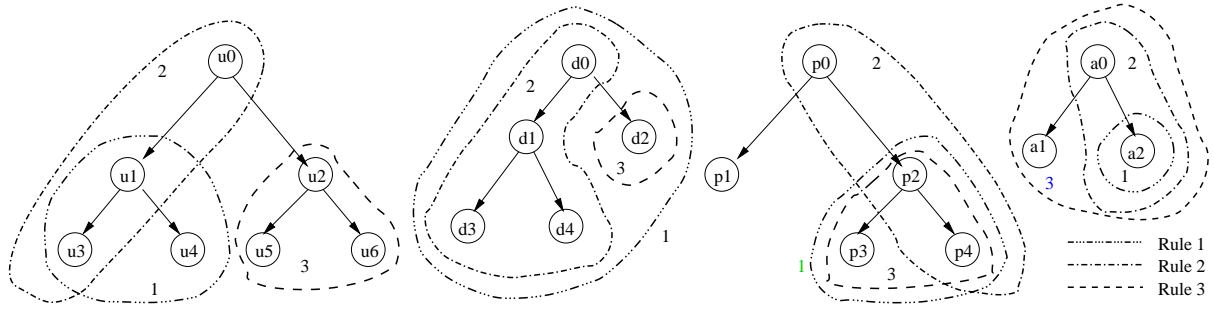


Figure 1: Hierarchies. Dashed areas indicate the scopes of the rules in the respective dimensions.

by a deny rule for the whole hierarchies, i.e., a rule for the root element, but explicitly excluding the siblings on the path to the root as defined below (for ease of description, we assume that each hierarchy has only a single root, which we denote as (u_0, d_0, p_0, a_0)):

$$\begin{aligned}
& \text{siblings}(\langle(u, d, p, a), \text{seq}\rangle) \\
&= \{ \langle(u', d_0, p_0, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle \mid u_0 > u' > u \} \\
&\quad \cup \{ \langle(u_0, d', p_0, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle \mid d_0 > d' > d \} \\
&\quad \cup \{ \langle(u_0, d_0, p', a_0), \langle(dr, \text{true}, \bar{d}o)\rangle \mid p_0 > p' > p \} \\
&\quad \cup \{ \langle(u_0, d_0, p_0, a'), \langle(dr, \text{true}, \bar{d}o)\rangle \mid a_0 > a' > a \}
\end{aligned}$$

Roughly, this alternative representation and reshuffling of the rules allows us to generate a “normal form” for rule lists. Although the normal form has more rules than the original rule list, it simplifies the comparison of the rule lists because each individual rule does not necessarily have to be compared with all rules of the other rule list.

We describe the transformation from the original rule list to this normal form and to the final list of scope-based rules by means of a policy example, whose rule list is given below based on the hierarchies depicted in Fig. 1:

- 1 $\langle(u_1, d_0, p_2, a_2), (\circ, c_1, \bar{o}_1)\rangle$
- 2 $\langle(u_3, d_1, p_4, a_2), (-, c_2, \bar{o}_2)\rangle$
- 3 $\langle(u_2, d_2, p_2, a_0), (+, c_3, \bar{o}_3)\rangle$

The first step towards the scope-based rule list is to switch to the above-described representation of all deny rules (i.e., of rule 2 in the example). This means that we first extend each deny rule to all elements of the hierarchies and then explicitly exclude those elements that must not be affected by this artificially enlarged scope. Formally, this corresponds to a new rule for the root and additional rules for the respective siblings. However, we have to ensure that the remaining allow rules (i.e., rule 3) are not affected by the artificially inserted deny rule that covers all elements. Formally, this means that we have to shift the allow rule before the global deny rule. This is shown in Fig. 2.

Next, we let all original obligation rules float down the rule list as follows. We have to distinguish among four cases:

1. If there is no overlap with the next lower rule, i.e., there are no elements for which both rules are matching, we swap both rules (as done in Steps (ii) & (v) in Fig. 3).
2. If the scope of the floating rule is contained in the scope of the next rule, the qualifier of that rule is appended to the floating rule’s qualifier and the obligation rule has reached its final position (shown in Step (vii) in Fig. 4a).
3. If the scope of the next rule is contained in the scope of the floating rule, we swap both rules but additionally append the

qualifier of the floating rule to the qualifier sequence of the current rule.

4. If both rules overlap only partially, we swap the rules and additionally insert a new rule that deals with the overlap as follows:

$$\begin{aligned}
& \text{overlap}(\langle(u, d, p, a), \text{seq}_1\rangle, \langle(u', d', p', a'), \text{seq}_2\rangle) \\
&=: \langle(u^*, d^*, p^*, a^*), \text{seq}_1\rangle
\end{aligned}$$

$$\text{where } u^* = \begin{cases} u & \text{if } u \leq_U u' \\ u' & \text{otherwise} \end{cases},$$

and similarly for the other dimensions. This is shown in Steps (i), (iii), and (iv) in Fig. 3.

After all obligation rules have been processed in this way, we let the positive rules float up until a rule is reached whose scope comprises the scope of the allow rule. In the policy example, rule 3 in Fig. 4a floats up to the top as there are only either nonoverlapping rules (2e, 2d, 2a, 2a') or partially overlapping obligation rules. This finally yields the desired scope-based rule list shown in Fig. 4b. Below lemmas capture the important properties of scope-based rule lists.

LEMMA 1. *Let $Pol = (Voc, R, gc, dr, \bar{d}o)$ be a privacy policy and let SR denote the scope-based rule list of R . Let $\sigma = \langle(u, d, p, a), \text{seq}\rangle$ and $\sigma' = \langle(u', d', p', a'), \text{seq}'\rangle$ be arbitrary rules in SR . If $\text{scope}(u, d, p, a) \subset \text{scope}(u', d', p', a')$ then σ has higher precedence than σ' .*

LEMMA 2. *Let $Pol = (Voc, R, gc, dr, \bar{d}o)$ be a privacy policy and let SR denote the scope-based rule list of R . Then for every valid request (u_R, d_R, p_R, a_R) for which there exists a matching rule in R , the following holds:*

- *There exists a rule in SR that matches for (u_R, d_R, p_R, a_R) .*
- *Let $\langle(u, d, p, a), \text{seq}\rangle$ denote the rule with the highest precedence in SR and let (u_R, d_R, p_R, a_R) be an arbitrary element in the scope of $\langle(u, d, p, a), \text{seq}\rangle$. Then seq contains the qualifiers from all matching rules in R for (u_R, d_R, p_R, a_R) .*

- 1 $\langle(u_1, d_0, p_2, a_2), \langle(\circ, c_1, \bar{o}_1)\rangle\rangle$
- 2a $\langle(u_4, d_0, p_2, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 2b $\langle(u_2, d_0, p_0, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 2c $\langle(u_0, d_2, p_0, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 2d $\langle(u_0, d_0, p_3, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 2e $\langle(u_0, d_0, p_1, a_0), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 2f $\langle(u_0, d_0, p_0, a_1), \langle(dr, \text{true}, \bar{d}o)\rangle\rangle$
- 3 $\langle(u_2, d_2, p_2, a_0), \langle(+, c_3, \bar{o}_3)\rangle\rangle$
- 2' $\langle(u_0, d_0, p_0, a_0), \langle(-, c_2, \bar{o}_2)\rangle\rangle$

Figure 2: Expanded rule list of policy example.

Additionally, we want to cover those requests for which there is no matching rule in the rule list; in particular, we have to consider those requests that are valid requests for the policy with which we want to compare our policy. Thus, for every root (u^*, d^*, p^*, a^*) of the combined vocabularies for which there does not already exist a matching rule, the rule $\langle (u^*, d^*, p^*, a^*), (dr, \text{true}, \bar{d}o) \rangle$ is appended to the rule list.

3.2 Normalization of Qualifier Sequences

In this part, qualifier sequences are transformed into equivalent, so-called *normalized* sequences, that no longer contain qualifiers with obligate ruling. Each sequence ends with a qualifier $(dr, \text{true}, \bar{d}o)$. In Section 3.3, we show that two qualifier sequences of this special form can easily be compared.

We describe the transformation by the axioms below, which are used as rewriting rules. The first two axioms state that an obligate ruling can always be shifted to the right by adopting suitable conditions and obligations. Note that there is no axiom for two subsequent qualifiers with obligate ruling.

$$\frac{(\circ, c_1, \bar{o}_1); (r, c_2, \bar{o}_2) \quad c_1 \Rightarrow c_2, r \in \{+, -\}}{(r, c_1, \bar{o}_1 \& \bar{o}_2)}$$

$$\frac{(\circ, c_1, \bar{o}_1); (r, c_2, \bar{o}_2), \quad \neg(c_1 \Rightarrow c_2), r \in \{+, -\}}{(r, c_1 \wedge c_2, \bar{o}_1 \& \bar{o}_2); (r, c_2, \bar{o}_2); (\circ, c_1, \bar{o}_1)}$$

The next two axioms simplify qualifier sequences. They omit qualifiers that are “hidden” beyond a qualifier with higher precedence, and derive a more useful representation of conditions.

$$\frac{(r_1, c_1, \bar{o}_1); (r_2, c_2, \bar{o}_2) \quad c_2 \Rightarrow c_1, r_1 \in \{+, -\}, r_2 \in \{+, -, \circ\}}{(r_1, c_1, \bar{o}_1)}$$

$$\frac{(r_1, c_1, \bar{o}_1); (r_2, c_2, \bar{o}_2) \quad \neg(c_2 \Rightarrow c_1), r_1 \in \{+, -\}, r_2 \in \{+, -, \circ\}}{(r_1, c_1, \bar{o}_1); (r_2, c_2 \wedge \neg c_1, \bar{o}_2)}$$

If the transformed sequence generated by the application of the axioms described above does not end with the qualifier $(dr, \text{true}, \bar{d}o)$, we want to be able to explicitly append this qualifier to the qualifier sequence. This is captured in the axiom below.

$$\frac{(\circ, c, \bar{o})}{(dr, c, \bar{o} \& \bar{d}o); (dr, \text{true}, \bar{d}o)}$$

For example, consider the qualifier sequence $(\circ, c_1 \wedge c_2, \bar{o}_7); (+, c_1, \bar{o}_6); (-, c_1 \wedge c_2, \bar{o}_5); (\circ, c_2, \bar{o}_4); (-, c_2, \bar{o}_1)$, which we want to transform into normal form. Applying the axioms 2, 1, 1, and 3, we get the rearranged sequence $(+, c_1 \wedge c_2, \bar{o}_6 \& \bar{o}_7); (-, c_2, \bar{o}_4 \& \bar{o}_1); (+, c_1, \bar{o}_6); (dr, \text{true}, \bar{d}o)$, where hidden qualifiers are removed and obligations with obligate ruling are pushed into qualifiers with allow or deny ruling. The sequence is terminated by an “otherwise” qualifier, which returns the default ruling and default obligation of the policy.

For optimization, we use the last two axioms, which correspond to elimination rules that remove inapplicable qualifiers:

$$\frac{(r_1, c_1, \bar{o}_1); (r_2, c_2, \bar{o}_2) \quad c_2 \Rightarrow \text{false}, r_1 \in \{+, -\}, r_2 \in \{+, -, \circ\}}{(r_1, c_1, \bar{o}_1)}$$

$$\frac{(r_1, c_1, \bar{o}_1); (r_2, c_2, \bar{o}_2) \quad c_1 \Rightarrow \text{false}, r_1 \in \{+, -\}, r_2 \in \{+, -, \circ\}}{(r_2, c_2, \bar{o}_2)}$$

The following lemma summarizes the main property of normalized qualifier sequences.

LEMMA 3. *Let (r, c, \bar{o}) and (r', c', \bar{o}') be two qualifiers in a normalized sequence seq , and let \Rightarrow be a correct implies relation for the considered vocabulary. Then the following holds:*

1. *If $c \Rightarrow c'$ then (r, c, \bar{o}) has higher precedence than (r', c', \bar{o}') , i.e., it comes first in the sequence.*
2. *For any assignment χ for the considered vocabulary, there exists at least one qualifier in seq whose condition is satisfied under χ .*

3.3 Comparison of Qualifier Sequences

The comparison of two sequences checks whether there is a refinement for every possible pair of qualifiers. Condition comparison is based on the considered implies relation, which we assume to be correct. To illustrate the comparison process, we consider the normalized qualifier sequences (1) and (2) of Fig. 5. Roughly, for each qualifier in sequence (2) and in descending order, we check those qualifiers in sequence (1) for refinement whose conditions could be concurrently satisfied until we reach a qualifier whose condition implies the qualifier’s condition of sequence (2). If we obtain a refinement for this qualifier (explained in more detail below), we proceed with the next qualifier of sequence (2), until we finally reach a qualifier in the sequence (2) whose condition must be fulfilled under the assumption that the condition of the currently investigated qualifier of sequence (1) holds. After this refinement check is also successful, we proceed with the next element of sequence (1).

In the example, we start with the qualifier $(r'_1, c_1 \wedge c_3, \bar{o}'_1)$ and assume that the condition $c_1 \wedge c_3$ is true. We process the elements of sequence (1) in descending order until a qualifier with satisfied condition is found. As the condition $c_1 \wedge c_2 \wedge c_3$ of the first qualifier $(r_1, c_1 \wedge c_2 \wedge c_3, \bar{o}_1)$ may be true concurrently, we have to compare (r_1, \bar{o}_1) and (r'_1, \bar{o}'_1) . More precisely, we have to check that if $r_1 \neq \circ$ we have $r'_1 = r_1$; moreover \bar{o}'_1 must refine \bar{o}_1 . If this holds we continue the comparison with the next qualifier in sequence (1).

We know at this point that $((c_1 \wedge c_3) \wedge \neg(c_1 \wedge c_2 \wedge c_3))$ holds. As the implies relation is correct, we obtain $((c_1 \wedge c_3) \wedge \neg(c_1 \wedge c_2 \wedge c_3)) \Rightarrow \neg(c_1 \wedge c_2)$; hence the condition $(c_1 \wedge c_2)$ cannot be true. This means that the qualifier $(r_2, c_1 \wedge c_2, \bar{o}_2)$ does not have to be considered. The same holds for qualifier (r_3, c_2, \bar{o}_3) . Because of $c_1 \wedge c_3 \Rightarrow c_1$, (r_4, c_1, \bar{o}_4) is the next matching qualifier and the tuples (r_4, \bar{o}_4) and (r'_1, \bar{o}'_1) have to be compared. Moreover, because $c_1 \wedge c_3$ implies c_1 , no remaining elements in sequence (1) must be checked.

We continue the comparison with the second qualifier in sequence (2). At this point we know that c_3 and $\neg(c_1 \wedge c_3)$ hold. Because condition $c_1 \wedge c_3$ does not hold, the qualifier $(r_1, c_1 \wedge c_2 \wedge c_3, \bar{o}_1)$ cannot apply. Furthermore, because of $\neg(c_1 \wedge c_2) \wedge c_3$, the same holds for the qualifiers $(r_2, c_1 \wedge c_2, \bar{o}_2)$, (r_3, c_2, \bar{o}_3) , and (r_4, c_1, \bar{o}_4) . Thus, we have to check (r'_2, c_3, \bar{o}'_2) with $(dr_1, \text{true}, \bar{d}o_1)$. Similarly, we check the remaining elements in sequence (2). The processing of all qualifiers in sequence (2) is summarized in Table 1.

3.4 Comparison of extended rule lists

Finally, we are ready to check for refinement of two privacy policies by comparing their normalized, scope-based rule lists. If there is refinement for the qualifier sequences of all “matching” rules then there is policy refinement.

Let SR_i for $i = 1, 2$ denote two scope-based rule lists. Let $\sigma_2 = \langle (u_2, d_2, p_2, a_2), seq_2 \rangle$ be a rule in SR_2 . Processing SR_1 in descending precedence, we check each overlapping rule $\sigma_1 = \langle (u_1, d_1, p_1, a_1), seq_1 \rangle$ whether the qualifier sequences seq_2 and seq_1 constitute a refinement. If there is no refinement, the algorithm stops and returns *false*. The processing finishes when a

Table 1: Request evaluation results comparison.

Satisfied Condition	Result given by seq (1)	Result given by seq (2)
$c_1 \wedge c_2 \wedge c_3$	(r_1, \bar{o}_1)	(r'_1, \bar{o}'_1)
$c_1 \wedge c_3$	(r_4, \bar{o}_4)	(r'_1, \bar{o}'_1)
$c_2 \wedge c_3$	(r_3, \bar{o}_3)	(r'_2, \bar{o}'_2)
c_3	$(dr_1, \bar{d}o_1)$	(r'_2, \bar{o}'_2)
$c_1 \wedge c_2$	(r_2, \bar{o}_2)	(r'_3, \bar{o}'_3)
c_1	(r_4, \bar{o}_4)	(r'_3, \bar{o}'_3)
c_2	(r_3, \bar{o}_3)	$(dr_2, \bar{d}o_2)$
--	$(dr_1, \bar{d}o_1)$	$(dr_2, \bar{d}o_2)$

rule σ'_1 with $scope(\sigma'_1) \subseteq scope(\sigma_2)$ is found. This is always the case because every SR ends with rule(s) covering the entire hierarchies (by construction).

To illustrate the comparison, consider the two scope-based rule lists depicted in Fig. 6. The goal of the comparison is to test whether every request evaluation result in SR_2 refines the corresponding evaluation result in SR_1 . Thus, for every rule in SR_2 , all possible matching rules in SR_1 are tested.

1	$\langle (u_2, d_2, p_2, a_0), seq_1 \rangle$		
2	$\langle (u_4, d_0, p_2, a_2), seq_2 \rangle$		
3	$\langle (u_4, d_0, p_0, a_0), seq_3 \rangle$		
4	$\langle (u_1, d_0, p_2, a_2), seq_4 \rangle$	1'	$\langle (u_4, d_0, p_0, a_0), seq'_1 \rangle$
5	$\langle (u_0, d_0, p_0, a_0), seq_5 \rangle$	2'	$\langle (u_0, d_0, p_0, a_0), seq'_2 \rangle$

List SR_1 List SR_2 **Figure 6: Example extended rule list comparison.**

In descending order, we check each rule in SR_2 with rules in SR_1 whose scopes overlap, comparing their qualifier sequences as described in Section 3.3. Thus, we begin with rule 1'. The first overlap is with rule 2 ($scope(u_4, d_0, p_2, a_2) \subseteq scope(u_4, d_0, p_0, a_0)$). If the qualifier sequences seq_1 and seq_2 are a refinement then we continue unless SR_2 is not a refinement of SR_1 , in which case we stop. The next overlapping rule is rule 3. After successful comparison we do not have to check the remaining rules in SR_1 because the scope of rule 3 completely covers the scope of rule 1'. We continue with the second rule in SR_2 and check overlap with the rules in SR_1 in descending order. Because rule 2' has scope (u_0, d_0, p_0, a_0) , the qualifier sequence of every rule in SR_1 must be checked.

The structure of SR_i allows for testing the refinement for all the possible valid requests. Thus, if the refinement is verified for all the compared sequences of qualifiers, then the comparison algorithm returns true.

THEOREM 1. *Let $P_i = (V_i, R_i, gc_i, dr_i, \bar{d}o_i)$ for $i = 1, 2$ be two privacy policies. Let furthermore P_i^* for $i = 1, 2$ denote the policies that are derived as in Definition 10, and let a correct implies relation for the considered vocabularies be given. Then the following holds:*

If the scope-based comparison algorithm applied on P_1^ and P_2^* outputs true, then P_1 is a refinement of P_2 . Moreover, if the implies relation is also complete, then the converse direction also holds, i.e., if P_1 is a refinement of P_2 then the scope-based comparison algorithm outputs true.*

4. CONCLUSION

We have presented an efficient algorithm to check privacy policy refinement. In particular, we have addressed the privacy-inherent difficulties of upward inheritance of deny rules, accumulation of obligations via obligate rules, and conditional rules. No other efficient algorithmic solution for checking refinement of privacy policies has yet been given.

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