Social Networks: Insecure by design?

Simon McGarr
Data Compliance
Europe
What are Social Networks?

The value users get is not where the value in the companies comes from.
Social Networks play an increasingly critical role in society

- Family connections
- Career development
- Accessing information
- Private Communications
A sense of scale
Social Media operates on a scale without any parallel.
Each of the top 4 platforms have more active users than the entire Catholic Church. (1.2bn, per the Vatican).
2,410,000,000
That’s 2.41 billion active Facebook users, June 2019.
The vast income streams of Social Networks rely on a continued, and ever expanding, ability to profile individuals and to then sell advertising against the knowledge about people gained through that surveillance.
If you’re not paying for a product, you are the product.
The GDPR challenge

How social media companies have reacted, and how they haven’t
Typical Data Control Structure
GDPR: Threats to the model

**Facebook:** Facial Recognition

**Google:** Selling Ads against behaviour

**YouTube:** Collecting data from embeds

**LinkedIn:** Uploading contacts
Zuckerberg’s Speech Notes at 2018 US Senate Hearing

GDPR [Don’t say we already do what GDPR requires]
- People deserve good privacy tools and controls wherever they live.
  - Provides control over data use -- what we’ve done for a few years.
  - Requires consent -- done a little bit, now doing more in Europe and around the world.
- Support privacy legislation that is practical, puts people in control and allows for innovation.
Facebook:

Can we
- Scan all photos
- Recognise all faces
- Tag the ones who’ve consented to be told?
Except now

EVERYONE’S BIOMETRIC FACIAL DATA IS PROCESSED, EVEN WHEN THEY’VE SAID NO
Google: The Invisible Auction

Through the use of cookies and sign-in data, Google profiles any user who loads a page with an ad space.

They then run an auction for that ad, sharing data.
Challenges to Real Time Bidding system

- Brave (a browser company), UCL and ORG complained to ICO and DPC
- Said that data, including sensitive personal data, is shared to hundreds of bidders without legitimate interest or consent.
ICO Finding:

“Thousands of organisations are processing billions of bid requests in the UK each week with (at best) inconsistent application of adequate technical and organisational measures to secure the data in transit and at rest...”
DATA LEAKAGE IN ONLINE ADVERTISING

This is the current process of real-time bidding that is used in online behavioural advertising.

Legend

- Yellow: Channel of data leakage
- Money
- Person: Personally identifiable information

website.com
**YouTube: The TV that watches you**

YouTube collects data on who lands on any page embedding one of their videos.

YouTube’s Terms and Conditions for site owners makes them responsible for getting consent.

---

We collect information about your activity in our services, which we use to do things like recommend a YouTube video that you might like. The activity information that we collect may include:

- Terms that you search for
- Videos that you watch
- Views and interactions with content and ads
- Voice and audio information when you use audio features
- Purchase activity
- People with whom you communicate or share content
- Activity on third-party sites and apps that use our services
- Chrome browsing history that you’ve synced with your Google Account
Except

BY THE TIME YOU CAN ASK FOR THEIR CONSENT, THE DATA HAS ALREADY BEEN TRANSFERRED TO YOUTUBE
Please accept youtube cookies to play this video.
By accepting you will be accessing a service provided by a third party external to europa.eu.

The EDPS Solution
Future Events

**Regulation**
The Irish DPC and UK ICO have received complaints re AdTech model. EDPS may be involved through conciliation mechanism.

**E-Privacy**
The E-Privacy Regulation, still a hotly contested text, may limit how communications data (like WhatsApp, Facebook Messenger, Gmail) can be mined.

**User Revolt**
Although the total numbers of Active users globally continues to rise, there have been significant falls in the EU after GDPR

**Unknown Unknowns**
From Edward Snowden to Max Schrems, DRI to Cambridge Analytica. This is an area where dramatic changes can come from unknown sources.

**Political Pressure**
Whether from the US or the EU, political systems are recognising risks of social platforms for interference in democracy.

**Competition**
It seems impossible that Facebook/Google et al could fail. But historically, that has been more common than not.
THANKS!

Any questions?
You can find me at
- simon@datacomplianceeurope.eu

- Creative Commons Photo Credits:
  Surveillance Chic by Ryan McBride