

Original software publication

GDPR consent management and automated compliance verification tool

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ABSTRACT

This paper presents our scalable and interoperable tool for GDPR (General Data Protection Regulation) consent management and automated compliance verification. The tool enables GDPR-compliant data sharing and is beneficial to the industries that process personally identifiable data. The tool has been designed following the GDPR data protection by design principles and has been successfully validated against real-world industrial use case scenarios in smart cities and insurance.

Code metadata

Current code version
Permanent link to code/repository used for this code version
Legal Code License
Code versioning system used
Software code languages, tools, technology and services used
Compilation requirements, operating environments & dependencies
Support email for questions

v01
https://github.com/tekrajchhetri/GDPR_compliance_tool/SOFTX-D-23-00287
MITLicense
git
Python, SWI-Prolog, Docker, Flask, Flask-RESTful, SPARQLWrapper, GraphDB, MongoDB, Knowledge graphs and OpenFaaS
Python packages, Docker, OpenFaaS, GraphDB and MongoDB
tekraj.chhetri@sti2.at and r.delong@opengroup.org (Prolog)

1. Motivation and significance

Data sharing is of utmost importance in today's digitized world, as it helps to unlock the data-driven economy [1], enables the development of new applications [2] and supports data-driven decision-making, such as in healthcare, smart cities, smart homes and autonomous vehicles [3, 4]. For example, the sharing of Internet of Things (IoT) data in smart cities contributes to the enhancement of city services, such as city traffic and other policy-level decision making tasks.

However, as the data, for example, from the IoT in smart homes or connected vehicles, includes personally identifiable information (PII), there has been a significant concern over privacy. This has led to the adoption of one of the toughest privacy laws, the General Data Protection Regulation (GDPR) in 2018 [5]. The enforcement of GDPR in 2018 has brought about a paradigm shift in data protection and data sharing. To share or process PII data, it is necessary to comply with

GDPR requirements such as obtaining consent. Failure to comply with the GDPR requirements has severe consequences, which includes a fine of “up to 20 million euro, or 4% of the firm's worldwide annual revenue from the preceding financial year, whichever amount is higher” (Article 83). A total of 900 fines totaling €1.32 billion have already been levied for not complying with GDPR [6] including to companies such as Google and Twitter.

GDPR defines six legal bases for lawful data processing: consent, contract, legal obligation, vital interests, public task, or legitimate interests (Article 6), with consent being the most common. In addition to complying with these legal bases, however, additional requirements must be met, such as the implementation of measures to protect PII data. For example, prior to any data processing activities, informed consent must be obtained from the data subject (or user) whose data is being used. However, obtaining consent is only the first step towards

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GDPR compliance. Other requirements, such as the right to revoke consent at any time (Article 7 (3)), the implementation of the necessary technical and organizational measures (TOMs) or data protection by default (Article 25), and the demonstration of the processing of only consented data (or auditability) by the data controller (or processor) are required for authority. These requirements of GDPR have posed significant challenges, such as (i) automating compliance verification; (ii) implementing GDPR data protection by default principles; and (iii) translating the regulatory requirements like purpose limitation and storage minimization into code, and have become a factor impeding data sharing and the data economy as a whole. In addition to GDPR there are other challenges such as scalability and interoperability [7,8].

According to International Association of Privacy Professionals (IAPP) report on 2020 only 47% of the EU (European Union) companies are “fully” or “very” compliant [9], therefore there is a need for a solution that addresses the challenges posed by GDPR such as implementing data protection by default principles and preserving personal privacy while at the same time unlocking the benefits that could be obtained via data sharing. Moreover, Fery and Presidente [10] discovered similar findings in their recent (2024) study: GDPR has impacted company growth by incorporating extra burdens, such as added expenses. The challenges posed by GDPR have resulted in many works, such as [11–18] and projects like SPECIAL,¹ TRAPEZE² which provide the privacy-by-design framework for data sharing adhering to GDPR or performing compliance checking operations. However, these works either have different focus or limitations. For example, the work of Ranise et al. [11] was done before GDPR was enacted and is therefore limited. Also, Robol et al. [12] have proposed a privacy-by-design framework but have left implementation to future work. The work of Brodin et al. [13] does not provide automation, and Truong et al.’s [15] work needs to focus on interoperability. Moreover, Bonatti et al. [14] designed a scalable reasoner to provide real-time compliance checking, thereby addressing the SPECIAL’s use cases, such as telecom scalability requirements. They also use the description logic policy language to formalize consent and data controller policies. However, their work mainly focuses on the reasoner and does not cover other aspects of GDPR, such as TOMs, the focus of this work. Most importantly, most work does not implement TOMs nor address interoperability issues [15], that our work addresses. Furthermore, our work addresses business case-specific challenges, such as the broken consent chain in the insurance industry due to ownership transfer [19].

In this paper we present our tool that facilitates consent management tasks such as consent creation, revocation, and automated compliance verification to enable GDPR compliant data sharing and processing. The tool adheres to GDPR requirements: lawfulness, fairness, and transparency (Article 5(1)(a)), purpose limitation (Article 5(1)(b)), data minimization (Article 5(1)(c)), storage minimization (Article 5(1)(e)), and accuracy, integrity, confidentiality, storage limitation, and accountability (Article 5(1)(d), Article 5(1)(e), Article 5(1)(f), and Article 5(2)). In addition, the design of the tool follows the principles of data protection by design [7]. The tool supports features such as auditability and interoperability through the use of knowledge graphs (KGs) [20] for consent representation. The tool, which is the key component of the smashHit³ project, has been successfully tested in real-world connected-car insurance and smart city scenarios. In the smashHit project the tool is referred to as the automatic contracting tool (ACT) [21,22]. The tool enables GDPR-compliant data sharing and processing and is therefore useful for any industry that deals with PII data. Additionally, the tool allows users to view whether the data processing or sharing is in accordance with their consent, allows them to take appropriate action, and helps them to be in control of their data and privacy.

2. Software description

The tool follows the microservices architectural pattern, a well-established architectural pattern that permits scalability [23,24]. The scalability of the tool was evaluated by simulating 52,200 users making a maximum of 241 requests per second (minimum of 100 requests per second) [7] and by the business case partner with a simulation of 200,000 active vehicles, where the tool supported operations such as consent creation and revocation. Moreover, the tool uses Docker,⁴ a containerization technology that provides portability and agility. The tool has been developed in Python,⁵ except for the privacy and security service, which has been implemented in Prolog.⁶ Section 2.1 provides the brief overview of the software architecture and Section 2.2 provides the overview of the functionalities. Our paper [7] and smashHit white paper [21] provide further detail about the tool.

2.1. Software architecture

Fig. 1 shows a high-level overview of the software architecture of the GDPR consent management and automated compliance verification tool. Additionally, Fig. 2 provides information on a more granular level regarding the interactions of different services (or components) of our tool as well as external entities to perform compliance check operations. The tool exposes the REST (representational state transfer) API (application programming interface) endpoints, allowing other software or applications to interact with the backend core. The core further interacts with other microservices, including the security and privacy service, the logging service, the scheduler, and the graph database, GraphDB.⁷ Additionally, the logging service, which implements serverless functions using OpenFaaS,⁸ interacts with MongoDB.⁹ The logging service stores the tools decisions, such as consent creation and consent revocation results, which can then be used later for auditability purpose. The GraphDB is used for storing the consent information represented in KGs.

Access to the functionalities of the tool can only be made through API endpoints with valid Javascript Object Notation (JSON) Web Token (JWT)¹⁰ tokens and organizational tokens. The organizational token is set at the time of deployment and enables role-based access to the API endpoints. Moreover, the tool implements a customizable hybrid layered encryption scheme using Rivest–Shamir–Adleman (RSA) [25] and Advanced Encryption Standard (AES) [26], thereby enabling the query of the encrypted consent information without exposing any details from the GraphDB. The security and privacy service provides domain customizable functionalities such as privacy policy comparisons and policy decision making based on an implementation of Next Generation Access Control [27], an attribute based access control standard.

2.2. Software functionalities

The tool provides the following functionalities:

- **Data protection by design:** The tool embodies the principle of data protection by design, implementing features such as secure querying over the encrypted consent information stored in the GraphDB and an adjustable hybrid multi-layered encryption scheme using RSA and AES algorithms. Moreover, the tool implements a JWT token to enable secure access to the API endpoints.

⁴ <https://www.docker.com/>

⁵ <https://www.python.org/>

⁶ <https://www.swi-prolog.org/>

⁷ <https://www.ontotext.com/products/graphdb/>

⁸ <https://www.openfaas.com/>

⁹ <https://www.mongodb.com/>

¹⁰ <https://jwt.io/>

¹ <https://specialprivacy.ercim.eu>

² <https://trapeze.ercim.eu/resources/>

³ <https://smashhit.eu/>

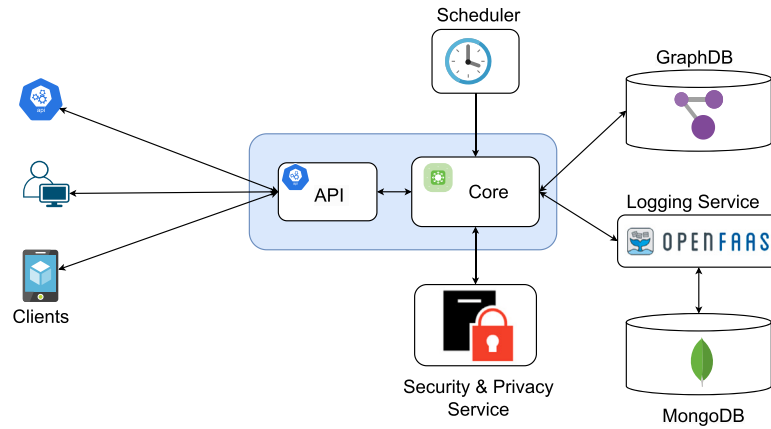


Fig. 1. Overview of the software architecture of the consent management and automated compliance verification tool.

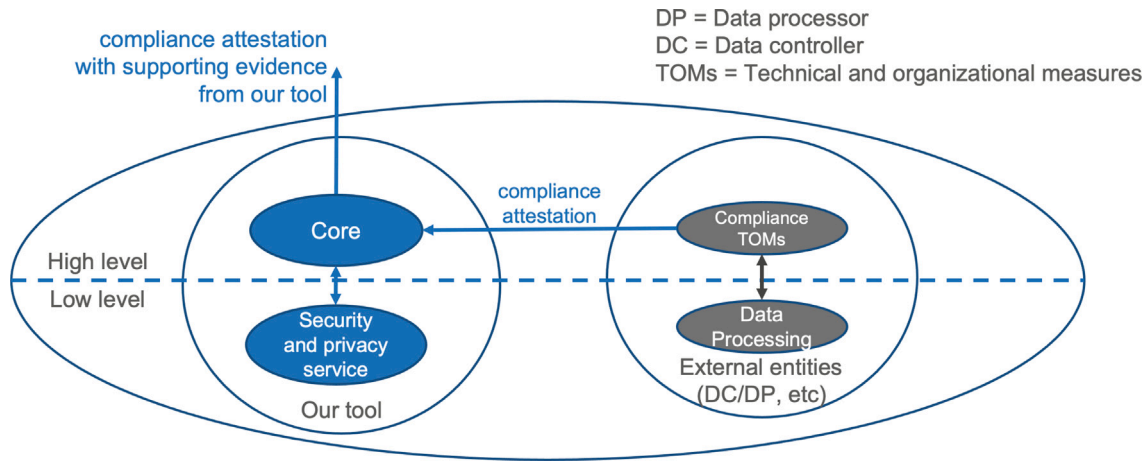


Fig. 2. Interaction between various components (or service) of our tool and external entities in order to carry out compliance checking operations.

- **Ease of integration:** The application is simple to integrate. In particular, integration can be accomplished readily via API endpoint calls. In addition, Swagger documentation¹¹ for API endpoints is automatically generated upon deployment, facilitating comprehension of API endpoints, their parameters and responses, further easing integration.
- **Role-based access to API endpoints:** The tool enables role-based access to the API endpoints using a decorator. Examples of role-based access include providing access only to API endpoints with view rights (e.g., view consent information) and providing access to API endpoints with create and delete permissions (e.g., consent creation and revocation).
- **Interoperability:** The tool maintains interoperability using KGs [21], which provide consistent and uniform consent representation. In particular, interoperability is achieved using the smashHitCore [28] ontology that defines the necessary concepts relating to GDPR and data processing. The smashHitCore ontology and the KGs used by the tool have been developed in collaboration with the legal team from the smashHit project. In addition, interoperability is bolstered by the use of standardized methods, such as the OpenAPI Specification¹² (formerly Swagger Specification) for REST API documentation.
- **Consent management:** The major consent management functionalities offered by the tool are: (i) the creation of consent

represented by KGs; (ii) consent revocation; (iii) storing consent in a secure manner such that no information about the data subject (or consent) can be gained by a third party; and (iv) handling broken consent chains [19].

- **Event logging:** The tool logs all information, such as the actions performed by the tool for consent creation and revocation operations. These details can later be used for auditability purposes.
- **Triggering alert:** Upon the detection of a consent violation during automated compliance checks, the tool triggers an alert so that timely action can be taken. The alert is a notification that transmits a message to inform humans, such as data processors, of a data processing violation. The alert is transmitted to the software agent that has been configured to receive alert notifications.
- **Compliance verification:** The tool provides functionality to perform both manual and automated compliance verification. By adjusting the time in the scheduler, the automated compliance verification can be configured to run daily, weekly, or monthly. To perform the compliance verification, the tool also interacts with the external systems of the data controller or processor. The compliance verification task is performed against the consented information, such as data processing operations that have been consented to, the purpose, data processor privacy policies, and data subject privacy preferences [7]. The compliance verification task trusts that the external entity (data controller or processor processing PII data) is reputable and provides accurate data processing information. With this assumption, i.e., that the provided information can be relied upon and is accurate, the tool guarantees accuracy of the compliance verification, as validated by

¹¹ <https://swagger.io/solutions/api-documentation/>

¹² <https://swagger.io/docs/specification/about>

```
class Revoke(MethodResource, Resource):
    @ccc_required(fresh=True)
    @doc(description='Revoke consent.', tags=['Consent'])
    @marshal_with(ReturnSchema)
    def delete(self, consent_id):
```

Fig. 3. Example of using decorator, `@ccc_required`, to allow role-based API endpoint access. The decorators (or roles) can be customized, i.e., added or removed as necessary, by editing the file `JWTDecorator.py`. The term “ccc” has no special significance; it was adopted based on the `smashHit` project in order to designate the research collaborator (or integrating software component from research collaborator) and can be changed as needed. The term “required” is used to denote required criteria.

regression tests with known answers. The compliance checking operation can be performed based on individual consent or based on the data subject (also referred to as the “data provider” in our work). In the case of the data provider, the compliance check is performed against all the given consents.

- **Auditing:** The tool provides auditing functionality. The auditing operations (or auditing) generate a report of all the operations performed, including the granting of consent and the results of compliance verification. Auditing can be performed either partially (a partial audit) or fully (a full audit) based on consent or the data provider.

3. Illustrative example

The instructions for the deployment are available in the GitHub¹³ repository. The details about the required input are available in the Swagger¹⁴ documentation that is automatically generated upon successful deployment. As an illustrative example, we show four functionalities of our tool.

The first one is the enabling of role-based access to API endpoints using a decorator. Fig. 3 shows the use of the decorator to enable role-based access to a API endpoint. Similarly, the second example is the creation of consent. Listing 1 shows the input that is passed to our tool via API for the creation of the consent, and similarly, Listing 2 shows the information that is logged into the MongoDB database for consent creation operation, and Fig. 4 shows the consent in a KG representation stored in encrypted form in GraphDB.

The third example is the revocation of consent that can be performed using the consent ID (Identity Document) via the API endpoint `/consent/consent_id/revoke`. Listing 3 shows the response to the revocation of consent. The fourth example is the auditing operation, which can be performed either based on consent using a consent ID or by a data provider (or data subject) using a data provider ID. Fig. 5 shows the response to the auditing operation performed based on the data provider.

Moreover, the smashHit white papers [29,30] provide more details about the insurance and the smart city use cases where our tool was tested. In addition to the white papers, video¹⁵ demonstrations are also available on the smashHit website for connected-car insurance and smart city use cases from the use case partners LexisNexis, Volkswagen, and Arctic Machine Oy (previously Infotripla) using the smashHit platform. The smashHit platform integrates our tool at the back-end to support the demonstrated operations relating to consent to enable data sharing.

```
{
  "Agents": [
    {
      "id": "60a55c9dd79dbc757698041ea",
      "role": "controller"
    }
  ],
  "DataProcessing": [
    "analysis",
    "marketing"
  ],
  "GrantedAtTime": "2023-04-29T12:47:44.950Z",
  "Medium": "mobile",
  "Purpose": "marketing",
  "Resource": {
    "SensorDataCategory": [
      {
        "data": [
          "gps",
          "speed"
        ]
      }
    ]
  },
  "city": "Innsbruck",
  "consentid": "CS1241X581",
  "country": "Austria",
  "dataproducer": "TEST_ILLUSTRATIVE_EG",
  "expirationTime": "2023-11-30T13:01:49.617Z",
  "state": "Tyrol"
}
```

Listing 1: An example of input consent data that is passed to our tool via `/consent/create` API endpoint for the creation of consent, which is then transformed into a KG representation and stored in an encrypted manner in GraphDB.



Fig. 4. KG representation of consent that is stored in GraphDB in an encrypted format.

4. Impact

While a number of studies have been conducted since the adoption of the GDPR, most of the work previously performed does not include compliance verification, does not implement TOMs, is not sufficiently scalable to meet real-world industrial requirements, and has not been tested in heterogeneous real-world use cases [7]. Our tool addresses limitations such as scalability, interoperability, consent management, and compliance verification, thereby enabling data sharing, which is crucial to economic viability and the preservation of personal privacy. The tool was a central component of the smashHit project and has also been recognized by the EU innovation radar as one of its key

¹³ <https://github.com>

14 <https://swagger.io>

15 <https://smashhit.eu/demonstrator-videos/>


```

1  "act_status_code": 7200,
2  "decision": "AUDIT_SUCCESS",
3  "decision_token":
4    "8e8069e0f07ae7ca13b0c8ec30128b1203f5f9c82c86f4e44f798ab383df9f768dfdb5387846c81ee8bf20ff555f67abf5cd62726faccad3f44075f43",
5  "message": "{ \"data_provider\": 'DPTST1234', 'consent_decision': [{ 'id': { '$oid': '63f7e266ff7c8ec5c5e2e245' }, 'act_status_code': 7100, 'decision': 'CONSENT_CREATION_SUCCESS', 'decision_token': '4bd376a288ac9661564fdb8491dae9a4a9f558f1e04bebecaef36bf4ee6c0b4ff69bbfe00d3bbf17c22f3a45e78189da9dd6389d9114794e2677078c115dea', 'timestamp': 1677189734.434367, 'consent_id': 'CID123_REVOCATIONTEST1' }, 'consent_data': [{ 'CID123_REVOCATIONTEST1': [{ 'DataController': '60a55c9dd79dbc757698041ea' }, { 'Purpose': 'marketing' }, { 'Data': [{ 'SensorDataCategory': 'data', 'data': { 'gps', 'speed' } } ] }, { 'Duration': '\\\"2022-11-30 13:01:49.617000+00:00^xsd:dateTime\\\"'}, { 'DataProcessor': 'None' }, { 'City': 'Innsbruck' }, { 'DataProcessing': [ 'marketing', 'analysis' ] }, { 'DataProvider': 'DPTST1234' }, { 'DataRequester': 'None' }, { 'Medium': 'mobile' }, { 'State': 'Tyrol' }, { 'Country': 'Austria' }, { 'GrantedAtTime': '\\\"2022-09-18 16:47:44.950000+00:00^xsd:dateTime\\\"'}, { 'CID123_ACT1': [{ 'DataController': '60a55c9dd79dbc757698041ea' }, { 'Purpose': 'marketing' }, { 'Data': [{ 'SensorDataCategory': 'data', 'data': { 'gps', 'speed' } } ] }, { 'Duration': '\\\"2022-11-30 13:01:49.617000+00:00^xsd:dateTime\\\"'}, { 'DataProcessor': 'None' }, { 'City': 'Innsbruck' }, { 'DataProcessing': [ 'marketing', 'analysis' ] }, { 'DataProvider': 'DPTST1234' }, { 'DataRequester': 'None' }, { 'Medium': 'mobile' }, { 'State': 'Tyrol' }, { 'RevokedAtTime': '\\\"1677191548.544772^xsd:dateTime\\\"'}, { 'Country': 'Austria' }, { 'GrantedAtTime': '\\\"2022-09-18 16:47:44.950000+00:00^xsd:dateTime\\\"'} ] } ] }",
6  "timestamp": "1677191687.475697"

```

Fig. 5. A snippet of response for a full audit operation based on the data provider.

```

{
  "_id": {
    "$oid": "644ba526ae697879cdf95f17"
  },
  "act_status_code": 7100,
  "decision": "CONSENT_CREATION_SUCCESS",
  "decision_token": "50ac901c67fd9fb13b07d30ad4d0d6df53d95598a08445766ce646d191ab6bdba6a258309b2a313bfd5f4c812f8b77a951994fd354a015d7f45ee43946c598af",
  "timestamp": 1682679077.786106,
  "consent_id": "CS1241X581"
}

```

Listing 2: A snapshot of the information logged in MongoDB for the consent creation operation.

```

{
  "act_status_code": 8000,
  "decision": "CONSENT_REVOCATION_SUCCESS",
  "decision_token": "ca4085f38cde2d68694e3e20ccba389549dc5730bd151688e6dd364b02b309aae3ce22b50c66ae32e96af6a1f8fb9c06775f26eba90b783725a8b62a4d8d8fa9",
  "timestamp": "1682685344.315328"
}

```

Listing 3: A snapshot of response from our tool for consent revocation.

innovations.¹⁶ The tool can be used in practice because it was developed in close collaboration with the legal and industrial partners from the smashHit project and was successfully evaluated in heterogeneous real-world connected-car insurance [30] and smart city [29] use cases. Importantly, the tool is adaptable to other statutes, such as CCPA (California Consumer Privacy Act) and domains such as healthcare, and thus has the potential to have a greater impact. This work has resulted in a journal publication [7] and has also been the basis for other scientific works, such as [31]. In addition, a number of additional publications utilizing this work are in progress.

5. Conclusion

We have presented our scalable and interoperable GDPR consent management and automated compliance verification tool, which was developed in close collaboration with legal experts and industrial partners, and tested against real-world use case scenarios. The tool is useful for any industry that processes PII data, as it enables GDPR-compliant processing and sharing of the data. Moreover, the tool is also useful to individuals, as it helps them be aware of whether the data processing activities are happening as per their consent. The potential for the tool's commercial exploitation and standardization for the security and privacy service components are being pursued. The source code is freely available under the MIT license. As a future work, we intend to develop

comprehensive documentation for the tool as well as parameterize its configuration settings via API endpoints, which will further ease the configuration setup and use of the tool.

CRedit authorship contribution statement

Tek Raj Chhetri: Conceptualization, Investigation, Methodology, Resources, Software, Validation, Visualization, Writing – original draft, Writing – review & editing. **Anna Fensel:** Funding acquisition, Investigation, Writing – review & editing. **Rance J. DeLong:** Conceptualization, Data curation, Formal analysis, Investigation, Resources, Software, Validation, Writing – review & editing.

Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

Data availability

The link to the source code has been included in the manuscript.

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¹⁶ <https://www.innorado.eu/innovation/44562>

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