# Before the FEDERAL TRADE COMMISSION Washington, D.C. 20580

Privacy Roundtables - Comment, Project No. P095416

# COMMENTS OF THE ELECTRONIC FRONTIER FOUNDATION

The Electronic Frontier Foundation respectfully submits these brief comments in response to the Federal Trade Commission's questions in advance of the third roundtable.

1. How can we best achieve accountability for best practices or standards for commercial handling of consumer data? Can consumer access to and correction of their data be made cost effective? Are there specific accountability or enforcement regimes that are particularly effective?

To evaluate or achieve accountability for commercial handling of consumer data, we need to be clear on the purposes behind promoting accountability. What problems do we hope that accountability will help solve? Equally important, we need to be clear on the assumptions underlying such hopes.

Under the OECD formulation of the Accountability Principle, "[a] data controller should be accountable for complying with measures which give effect to the principles stated above," referring to the principles of Collection Limitation, <sup>1</sup> Data Quality, <sup>2</sup> Purpose Specification, <sup>3</sup> Use Limitation, <sup>4</sup> Security Safeguards, <sup>5</sup> Openness, <sup>6</sup> and Individual Participation. <sup>7</sup> Accountability thus

<sup>&</sup>lt;sup>1</sup> "There should be limits to the collection of personal data and any such data should be obtained by lawful and fair means and, where appropriate, with the knowledge or consent of the data subject."

<sup>&</sup>lt;sup>2</sup> "Personal data should be relevant to the purposes for which they are to be used, and, to the extent necessary for those purposes, should be accurate, complete and kept up-to-date."

<sup>&</sup>lt;sup>3</sup> "The purposes for which personal data are collected should be specified not later than at the time of data collection and the subsequent use limited to the fulfillment of those purposes or such others as are not incompatible with those purposes and as are specified on each occasion of change of purpose."

<sup>&</sup>lt;sup>4</sup> "Personal data should not be disclosed, made available or otherwise used for purposes other than those specified in accordance with" other principles, except "with the consent of the data subject" or "by the authority of law."

<sup>&</sup>lt;sup>5</sup> "Personal data should be protected by reasonable security safeguards against such risks as loss or unauthorized access, destruction, use, modification or disclosure of data."

<sup>&</sup>lt;sup>6</sup> "There should be a general policy of openness about developments, practices and policies with respect to personal data. Means should be readily available of establishing the existence and nature of personal data, and the main purposes of their use, as well as the identity and usual residence of the data controller."

<sup>&</sup>lt;sup>7</sup> "An individual should have the right: a) to obtain from a data controller, or otherwise,

facilitates enforcement of the other principles.

One common assumption that motivates consumer advocates' insistence on accountability is that it promotes consumer choice. As we have noted before, EFF is dubious about reliance on notice and choice, even bolstered by strong transparency, to protect consumer privacy. The problem is that it is unrealistic to expect consumers to learn about and understand the specific policies of every website and every third-party service (such as ad networks, web analytics services, and content distribution services like Akamai) that collect data about consumers—no matter how prominently and transparently those policies are presented—especially given consumers' general belief that a privacy policy means privacy protection.

Obviously, the OECD fair information principles illustrate that notice and choice only begin the discussion. Yet the FTC's own prior analysis of the Fair Information Practice Principles (FIPs) has understated Collection Limitation (requiring companies to minimize the amount of personal information collected to that which is necessary for a transaction),<sup>8</sup> and Purpose Specification (requiring companies to have a clear and legitimate purpose for data collection), making it relatively easy for firms to collect extraneous information about consumers, and repurpose information without consumer consent.<sup>9</sup>

It is often absolutely unnecessary for systems to know the identity of users. The coin-operated payphone is a classic example; similarly, cash easily implements the principle of Collection Limitation or data minimization. Unfortunately, the tendency of modern technological systems is to collect more information, including identity information, and to store it longer than is needed to render services. The lack of true digital cash online is a persistent privacy deficit for the Internet.

We agree with other commenters that the FIPs remain critical to privacy protection, and that the Commission should give more weight to Collection Limitation and Purpose Specification in particular. Any emphasis on the Accountability principle does not, of course, make other FIPs unnecessary, nor will it supplant the FTC's role in ensuring that companies observe FIPs in the handling of consumer data. Indeed, we suggest that the FTC make aggressive use of its investigative authority under the Federal Trade Commission Act, 15 U.S.C. §41 et seq. — including the issuance of civil investigative demands under § 57b-1(c) — to monitor commercial practices, including accountability regimes, to ensure their compliance with FIPs.

confirmation of whether or not the data controller has data relating to him; b) to have communicated to him, data relating to him within a reasonable time; at a charge, if any, that is not excessive; in a reasonable manner; and in a form that is readily intelligible to him; c) to be given reasons if a request made under subparagraphs (a) and (b) is denied, and to be able to challenge such denial; and d) to challenge data relating to him and, if the challenge is successful to have the data erased, rectified, completed or amended."

<sup>8</sup> Indeed, a recent study found that Internet users have become more concerned in the past few years about information collection, especially about web sites gathering information about other web sites visited by users. Annie I. Antón et al., "How Internet Users' Privacy Concerns Have Evolved Since 2002," *IEEE Security and Privacy*, vol. 8 no. 1, 2010, pp. 21-27. <sup>9</sup> http://www.ftc.gov/reports/privacy3/fairinfo.shtm. That said, we believe that there are weaknesses in the FIPs that must be addressed. Specifically, the FIPs place an unrealistic burden on consumers to attempt to protect their privacy in a technically and organizationally complex online environment where consumers do not and probably cannot know what information about them is available to others, and what those others can do with their information. This asymmetry tends to make consent-based approaches less protective of privacy because consumers are unlikely to understand the full implications of their consent.

Accordingly, we suggest that accountability should be framed not merely as enabling consumer choice, but also social governance of company practices. When companies follow the Openness principle, they publicly commit to their practices and policies regarding consumer data: what data they do and do not collect, what they do with it, and so on. When these commitments are made with sufficient specificity, the Accountability principle does not merely protect the consumer as an individual, but provides the Commission, consumer groups, Congress and other enforcers (such as state attorneys general) with definite standards by which to gauge companies' actual performance.

One obvious implication is that enforcement ought not be left to the individual consumer, although it may begin there. Commenters have suggested, for instance, that the model of the Fair Credit Reporting Act (FCRA) can be expanded to cover consumer dossiers or profiles more generally. *See* Privacy Roundtable Comments of World Privacy Forum, at 4 (Nov. 6, 2009).

Consumer access to data under the principle of Individual Participation is another problem that, while unsolved, frustrates achievement of accountability. The FIPs lose much of their meaning when we do not know what information about us is possessed by which entities. Unfortunately, consumers today rarely know who was responsible for unauthorized or inappropriate uses of their information, if they learn of it at all. Data breach notification rules may expose the last data holder, but do not expose the data flows that led to the concentration of such information in the first place.

A thought experiment that may be useful in explaining this point is to imagine a world in which access to the data that others collect about us is not only possible, but cheap. Suppose there was a central index, a kind of "meta log," into which companies were required to place a record each time they start keeping new files on a person or household.

Individuals could authenticate themselves to the meta log, and once logged in, see which companies know what about them and where they learned it, and be in a position to hold those companies accountable for inappropriate or unauthorized data collection and use. The meta log might also contain links that suitably authenticated users could follow to obtain the actual data from the companies that are holding it, so that they could make corrections or request deletion when appropriate.

This "meta log" thought experiment is, of course, hypothetical; we are not suggesting that all of the security and administrative obstacles necessary for the creation of such an index have been

solved or are even solvable.<sup>10</sup> Instead, the thought experiment should explain what would need to be done to make the FIPs effective, or alternatively why we need to move beyond them.

In terms of actually building a meta log, there would be a significant challenge in ensuring that firms and other organizations started reporting their logs to it. But to the extent that this is difficult, it is only difficult because so much information is collected about us by so many different parties.

Precedent for the meta log concept exists, to some extent. Consumer access to free credit reports under the Fair and Accurate Credit Transactions Act (FACTA), Pub. L. 108-159, 111 Stat. 1952, is implemented through a central website (www.annualcreditreport.com) established by the three national credit bureaus: Experian, TransUnion, and Equifax. FACTA also establishes a right of free consumer access to non-credit consumer reports issued by "nationwide specialty consumer reporting" agencies, but with no central website or index.

As the Commission well knows, however, these examples illustrate the complexity of the problem: no one wants unauthorized persons to be able to access such personal data, yet the access-authentication process has itself led to identity theft. *See, e.g.*, <u>http://www.ftc.gov/bcp/edu/pubs/consumer/alerts/alt130.shtm</u> ("You may have seen Web sites or received unsolicited email offering credit reports, sometimes for free. Be aware that some of these online operators may not actually provide credit reports, but may be using these sites as a way to capture your personal information. From there, they may sell your information to others who may use it commit fraud, including identity theft.").

We are unaware of any elegant solutions to this problem. The same hard authentication work that websites like Google, Paypal and online banking systems have to do to mitigate identity theft would be applicable here. But any answer to the question of accountability needs a solution to the information problem that consumers currently face: when unauthorized or inappropriate uses are made of their information, they have no way to know who was responsible. If "meta log" type solutions are impractical, we will need to find others.

2. What potential benefits and concerns are raised by emerging business models built around the collection and use of consumer health information? What, if any, legal protections do consumers expect apply to their personal health information when they conduct online searches, respond to surveys or quizzes, seek medical advice online, participate in chat groups or health networks, or otherwise?

Commercial use of consumer health information obviously entails both benefits and concerns, many of which are beyond the scope of our comments. But existing practices clearly raise major privacy concerns. For example, the MedNet Mental Health Problems list, which the World Privacy Forum detailed in its Nov. 6, 2009 comments, provides information about almost 3 million consumers with "wide-ranging mental health issues" segmented by categories such as

<sup>&</sup>lt;sup>10</sup> Inquiry into the feasibility of a secure meta log does seem, however, to be a very worthwhile area for privacy research funding.

depression, autism and eating disorders.

We are not aware of any empirical research establishing consumer expectations about the legal protections surrounding their personal health information outside of the healthcare system itself. Given that consumers appear to believe that privacy policies inherently protect their privacy, however, it is fair to assume as an initial matter that consumers expect their personal health information to be protected against subsequent disclosure. Again, to use the MedNet Mental Health Problems list as an example, it is difficult to believe that the consumers on this list expected that their information would be commercially available in this way.

3. Should "sensitive" information be treated or handled differently than other consumer information? How do we determine what information is "sensitive"? What standards should apply to the collection and uses of such information? Should information about children and teenagers be subject to different standards and, if so, what should they be?

There is little doubt that certain categories of information—like health data—are more sensitive than others, and should be treated with great care. The legal framework surrounding privacy already reflects this idea to some degree. For example, federal laws mandate privacy protection for certain kinds of medical information (Health Insurance Portability and Accountability Act of 1996 (HIPAA), Pub. L. No. 104-191, 110 Stat. 1936, codified in scattered sections of 29 and 42 U.S.C.), financial information (FCRA and Gramm-Leach-Bliley (GLB), 15 U.S.C. § 6801-09, which the Commission administers), children's information online (Children's Online Privacy Protection Act (COPPA), 15 U.S.C. § 6504-06, which the Commission administers) educational records (Family Educational Rights and Privacy Act of 1974 (FERPA), 20 U.S.C. § 1232g), and genetic information (Genetic Information Nondiscrimination Act (GINA), Pub. L. No. 110-233, 122 Stat. 881, codified in scattered sections of 29 and 42 U.S.C.).

Within the category of protected health information, some data is deemed particularly sensitive under federal or state law: information related to alcohol and drug abuse is treated specially under 42 C.F.R. Part 2; information related to mental health under a variety of laws<sup>11</sup>; information related to HIV status<sup>12</sup>; information relating to reproductive health.<sup>13</sup>

In the medical context, part of the rationale for providing additional privacy/confidentiality safeguards for sensitive information is that people might avoid seeking certain types of medical help because they fear stigma, discrimination, etc. if their health information is disclosed (*e.g.*, information related to abortions, contraception, HIV, etc.). Privacy guarantees in theory help encourage people to seek treatment in the first place. Similarly, evidentiary privileges, such as those that protect attorney-client, psychotherapist-patient, and marital/spousal communications,

<sup>&</sup>lt;sup>11</sup> E.g., Calif. Welfare & Inst. Code § 5328; Calif. Civ. Code § 56.104

<sup>&</sup>lt;sup>12</sup> *E.g.*, Calif. Health & Safety Code § 120975; *Urbaniak v. Newton*, 226 Cal.App.3d 1128 (1991).

<sup>&</sup>lt;sup>13</sup> *E.g., Northwestern Memorial Hospital v. Ashcroft*, 362 F.3d 923, 929 (7<sup>th</sup> Cir. 2004) ("even if there were no possibility that a patient's identity might be learned from a redacted medical record, there would be an invasion of privacy.... revelation of the intimate details contained in the record of a late-term abortion may inflict a similar wound.").

seek to safeguard open communication within these relationships.

These same rationales justify protecting sensitive information in the online context. People should be able to use search engines to research their health conditions or to join online communities of religious belief or political activism without fear of stigma or discrimination. Adolescents should feel free to learn about reproductive health, sexual orientation, and other issues that are uniquely acute for their age as they transition to adulthood. And so on.

Nevertheless, we tentatively suggest that the Commission may be better off in the online context focusing on rules that protect consumer information generally without attempting to cordon off certain categories of sensitive information. The online consumer privacy problem is sufficiently grave that the focus should be on consumer data in general. And while special treatment for the types of sensitive information listed above is both right and good policy, attempting to also regulate sensitive data in the online context may unduly complicate regulation. We note also that some areas of sensitive online information, like personal electronic health records, are already the subject of considerable regulatory discussion as part of the broader dialogue over electronic health records privacy. We think the Commission can do much for privacy by addressing the general problem of online tracking and profiling sooner rather than later by avoiding the difficulties posed by focusing protections on sensitive data.

EFF does not say this lightly. But we see several considerable problems with attempting to regulate sensitive information more tightly than other consumer data in the general online environment, at least beyond existing regulation such as COPPA.

First, much of our existing sensitive data regulation takes place within a particular system: the healthcare system and its HIPAA-covered entities; financial data in the consumer/credit reporting industry; educational records in the educational system. Protecting sensitive data within these systems is not easy; to protect sensitive data more generally is much harder.

Second, properly defining sensitive information is difficult. As others have pointed out in their comments and at roundtables, the definition of "sensitive information" continues to change with technology, new uses for information, and new ways to correlate and aggregate personal information. Even seemingly benign information can be aggregated to create sensitive information, especially given the tendency in existing law to decontrol de-identified or aggregated data.

A corollary problem in the online context may be the difficulty of determining which sensitive information is personal. We do not know how easily a search engine, for instance, can tell whether a user's search queries about the swine flu relate to the user (or family member), or are instead curiosity, research, or just following the news.

Third, not only are existing private databases filled with sensitive information, but so are public records and user-based online blogs, websites, chatrooms, and other fora. Serious First Amendment issues could be raised by restricting the collection, use and dissemination of publicly available sensitive data.

We recognize that some data brokers like Experian consider information about children, older Americans, and self-reported ailment data to be "sensitive," and claim that they are able to manage the burdens of segregating or more tightly regulating such data. It may be useful for the Commission to use its investigative powers to inquire more deeply into how well the data industry currently handles the data that it deems sensitive, keeping in mind the existence of lists like the MedNet Mental Health Problems list.<sup>14</sup>

The European Union defines sensitive data more broadly, and imposes more stringent rules for processing data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sexual preference. In principle, such data cannot be processed. The EU tolerates derogation under very specific circumstances such as when the data subject explicitly consents to the processing of sensitive data, the processing of data is mandated by employment law, it may be impossible for the data subject to consent (*e.g.*, blood test of the victim of a road accident), and when processing of data has been publicly announced by the data subject or processing of data about members by trade unions, political parties or churches.

EFF is not expert on EU data protection law, but suggests that the Commission should research the EU's experience with attempting to regulate sensitive data in the general online context. Does the EU require search engines to treat search queries that appear to contain sensitive data differently, and if so, how?

In any case, we do not oppose more stringent regulation of sensitive data online on principle; our point is simply that such regulation may be more difficult to craft and implement than regulating consumer data generally. And it may be possible to enforce restrictions on selling or sharing profiles (like the MedNet Mental Health Problems list) more easily than restrictions on collecting or using such data.

Respectfully submitted,

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<sup>&</sup>lt;sup>14</sup> The FTC is empowered to enforce the FCRA under the FTC Act. 15 U.S.C. § 1681s. As such, the Commission may issue civil investigative demands under 15 U.S.C. § under § 57b-1(c) to investigate possible violations of the FCRA.

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# How Unique Is Your Web Browser?

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Abstract. We investigate the degree to which modern web browsers are subject to "device fingerprinting" via the version and configuration information that they will transmit to websites upon request. We implemented one possible fingerprinting algorithm, and collected these fingerprints from a large sample of browsers that visited our test side, panopticlick.eff.org. We observe that the distribution of our fingerprint contains at least 18.1 bits of entropy, meaning that if we pick a browser at random, at best we expect that only one in 286,777 other browsers will share its fingerprint. Among browsers that support Flash or Java, the situation is worse, with the average browser carrying at least 18.8 bits of identifying information. 94.2% of browsers with Flash or Java were unique in our sample.

By observing returning visitors, we estimate how rapidly browser fingerprints might change over time. In our sample, fingerprints changed quite rapidly, but even a simple heuristic was usually able to guess when a fingerprint was an "upgraded" version of a previously observed browser's fingerprint, with 99.1% of guesses correct and a false positive rate of only 0.86%.

We discuss what privacy threat browser fingerprinting poses in practice, and what countermeasures may be appropriate to prevent it. There is a tradeoff between protection against fingerprintability and certain kinds of debuggability, which in current browsers is weighted heavily against privacy. Paradoxically, anti-fingerprinting privacy technologies can be selfdefeating if they are not used by a sufficient number of people; we show that some privacy measures currently fall victim to this paradox, but others do not.

# 1 Introduction

It has long been known that many kinds of technological devices possess subtle but measurable variations which allow them to be "fingerprinted". Cameras [1, 2], typewriters [3], and quartz crystal clocks [4,5] are among the devices that

<sup>\*</sup> Thanks to my colleagues at EFF for their help with many aspects of this project, especially Seth Schoen, Tim Jones, Hugh D'Andrade, Chris Controllini, Stu Matthews, Rebecca Jeschke and Cindy Cohn; to Jered Wierzbicki, John Buckman and Igor Serebryany for MySQL advice; and to Andrew Clausen, Arvind Narayanan and Jonathan Mayer for helpful discussions about the data.

can be entirely or substantially identified by a remote attacker possessing only outputs or communications from the device.

There are several companies that sell products which purport to fingerprint web browsers in some manner [6, 7], and there are anecdotal reports that these prints are being used both for analytics and second-layer authentication purposes. But, aside from limited results from one recent experiment [8], there is to our knowledge no information in the public domain to quantify how much of a privacy problem fingerprinting may pose.

In this paper we investigate the real-world effectiveness of browser fingerprinting algorithms. We defined one candidate fingerprinting algorithm, and collected these fingerprints from a sample of 470,161 browsers operated by informed participants who visited the website https://panopticlick.eff.org. The details of the algorithm, and our collection methodology, are discussed in Section 3. While our sample of browsers is quite biased, it is likely to be representative of the population of Internet users who pay enough attention to privacy to be aware of the minimal steps, such as limiting cookies or perhaps using proxy servers for sensitive browsing, that are generally agreed to be necessary to avoid having most of one's browsing activities tracked and collated by various parties.

In this sample of privacy-conscious users, 83.6% of the browsers seen had an instantaneously unique fingerprint, and a further 5.3% had an anonymity set of size 2. Among visiting browsers that had either Adobe Flash or a Java Virtual Machine enabled, 94.2% exhibited instantaneously unique fingerprints and a further 4.8% had fingerprints that were seen exactly twice. Only 1.0% of browsers with Flash or Java had anonymity sets larger than two. Overall, we were able to place a lower bound on the fingerprint distribution entropy of 18.1 bits, meaning that if we pick a browser at random, at best only one in 286,777 other browsers will share its fingerprint. Our results are presented in further detail in Section 4.

In our data, fingerprints changed quite rapidly. Among the subset of 8,833 users who accepted cookies and visited panopticlick.eff.org several times over a period of more than 24 hours, 37.4% exhibited at least one fingerprint change. This large percentage may in part be attributable to the interactive nature of the site, which immediately reported the uniqueness or otherwise of fingerprints and thereby encouraged users to find ways to alter them, particularly to try to make them less unique. Even if 37.4% is an overestimate, this level of fingerprint instability was at least momentary grounds for privacy optimism.

Unfortunately, we found that a simple algorithm was able to guess and follow many of these fingerprint changes. If asked about all newly appearing fingerprints in the dataset, the algorithm was able to correctly pick a "progenitor" fingerprint in 99.1% of cases, with a false positive rate of only 0.87%. The analysis of changing fingerprints is presented in Section 5.

## 2 Fingerprints as Threats to Web Privacy

The most common way to track web browsers (by "track" we mean associate the browser's activities at different times and with different websites) is via HTTP cookies, often in conjunction with 3rd party analytics and advertising domains [9].

There is growing awareness among web users that HTTP cookies are a serious threat to privacy, and many people now block, limit or periodically delete them. Awareness of supercookies is lower, but political and PR pressures may eventually force firms like Adobe to make their supercookies comply with normal privacy settings.

In the mean time, a user seeking to avoid being followed around the Web must pass three tests. The first is tricky: find appropriate settings that allow sites to use cookies for necessary user interface features, but prevent other less welcome kinds of tracking. The second is harder: learn about all the kinds of supercookies, perhaps including some quite obscure types [10, 11], and find ways to disable them. Only a tiny minority of people will pass the first two tests, but those who do will be confronted by a third challenge: fingerprinting.

As a tracking mechanism for use against people who limit cookies, fingerprinting also has the insidious property that it may be much harder for investigators to detect than supercookie methods, since it leaves no persistent evidence of tagging on the user's computer.

#### 2.1 Fingerprints as Global Identifiers

If there is enough entropy in the distribution of a given fingerprinting algorithm to make a recognisable subset of users unique, that fingerprint may essentially be usable as a 'Global Identifier' for those users. Such a global identifier can be thought of as akin to a cookie that cannot be deleted except by a browser configuration change that is large enough to break the fingerprint.

Global identifier fingerprints are a worst case for privacy. But even users who are not globally identified by a particular fingerprint may be vulnerable to more context-specific kinds of tracking by the same fingerprint algorithm, if the print is used in combination with other data.

#### 2.2 Fingerprint + IP address as Cookie Regenerators

Some websites use Adobe's Flash LSO supercookies as a way to 'regenerate' normal cookies that the user has deleted, or more discretely, to link the user's previous cookie ID with a newly assigned cookie ID [12].

Fingerprints may pose a similar 'cookie regeneration' threat, even if those fingerprints are not globally identifying. In particular, a fingerprint that carries no more than 15-20 bits of identifying information will in almost all cases be sufficient to uniquely identify a particular browser, given its IP address, its subnet, or even just its Autonomous System Number.<sup>1</sup> If the user deletes their cookies while continuing to use an IP address, subnet or ASN that they have used previously, the cookie-setter could, with high probability, link their new cookie to the old one.

#### 2.3 Fingerprint + IP address in the Absence of Cookies

A final use for fingerprints is as a means of distinguishing machines behind a single IP address, even if those machines block cookies entirely.

It is very likely that fingerprinting will work for this purpose in all but a tiny number of cases.

### 3 Methodology

#### 3.1 A Browser Fingerprinting Algorithm

We implemented a browser fingerprinting algorithm by collecting a number of commonly and less-commonly known characteristics that browsers make available to websites. Some of these can be inferred from the content of static HTTP requests; others were collected by AJAX. We grouped the measurements into eight separate strings, though some of these strings comprise multiple, related details. The fingerprint is essentially the concatenation of these strings. The source of each measurement and is indicated in Table 3.1.

In some cases the informational content of the strings is straightforward, while in others the measurement can capture more subtle facts. For instance, a browser with JavaScript disabled will record default values for video, plugins, fonts and supercookies, so the presence of these measurements indicates that JavaScript is active. More subtly, browsers with a Flash blocking add-on installed show Flash in the plugins list, but fail to obtain a list of system fonts via Flash, thereby creating a distinctive fingerprint, even though neither measurement (plugins, fonts) explicitly detects the Flash blocker. Similarly many browsers with forged User Agent strings are distinguished because the other measurements do not comport with the User Agent.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> One possible exception is that workplaces which synchronize their desktop software installations completely may provide anonymity sets against this type of attack. In many instances, attackers will be able to detect this class of IP because of the appearance of interleaved cookies (A then B then A) with the same fingerprint and IP. This phenomenon might occur even if many users at the IP limit or periodically delete those cookies. Armed with this evidence the attacker would not succeed in distinguishing systems at that IP by fingerprint, but they would know to avoid trying.

<sup>&</sup>lt;sup>2</sup> We did not set out to systematically study the prevalence of forged User Agents in our data, but in passing we noticed 378 browsers sending iPhone User Agents but with Flash player plugins installed (the iPhone does not currently support Flash), and 72 browsers that identified themselves as Firefox but supported Internet Explorer userData supercookies.

Variable	Source	Remarks
User Agent	Transmitted by HTTP,	Contains Browser micro-version, OS
	logged by server	version, language, toolbars and some-
		times other info.
HTTP ACCEPT	Transmitted by HTTP,	
headers	logged by server	
Cookies enabled?	Inferred in HTTP,	
	logged by server	
Screen resolution	JavaScript AJAX post	
Timezone	JavaScript AJAX post	
Browser plugins,	JavaScript AJAX post	Sorted before collection. Microsoft Inter-
plugin versions		net Explorer offers no way to enumer-
and MIME types		ate plugins; we used the PluginDetect
		JavaScript library to check for 8 com-
		mon plugins on that platform, plus ex-
		tra code to estimate the Adobe Acrobat
		Reader version.
System fonts	Flash applet or Java	Not sorted; see Section 6.4.
	applet, collected by	
	JavaScript/AJAX	
Partial	JavaScript AJAX post	We did not implement tests for Flash
supercookie test		LSO cookies, Silverlight cookies, HTML
		5 databases, or DOM globalStorage.

Table 1. Browser measurements included in Panopticlick Fingerprints

An example of the fingerprint measurements is shown in Table A. In fact, Table A shows the modal fingerprint among browsers that included Flash or Java plugins; it was observed 16 times from 16 distinct IP addresses.

There are many other measurements which could conceivably have been included in a fingerprint. Generally, these were omitted for one of three reasons:

- 1. We were unaware of the measurement, or lacked the time to implement it correctly — including the full use of Microsoft's ActiveX and Silverlight APIs to collect fingerprintable measures (which include CPU type and many other details); detection of more plugins in Internet Explorer; tests for other kinds of supercookies; detection of system fonts by CSS introspection, even when Flash and Java are absent [13]; the order in which browsers send HTTP headers; variation in HTTP Accept headers across requests for different content types; clock skew measurements; TCP stack fingerprinting; and a wide range of subtle JavaScript behavioural tests that may indicate both browser add-ons and true browser versions [14].
- 2. We did not believe that the measurement would be sufficiently stable within a given browser — including geolocation, IP addresses (either yours or your gateway's) as detected using Flash or Java, and the CSS history detection hack.

3. The measurement requires consent from the user before being collectable — for instance, Google Gears supercookie support or the wireless router– based geolocation features included in recent browsers (which are also nonconstant).

#### 3.2 Mathematical Treatment

Suppose that we have a browser fingerprinting algorithm  $F(\cdot)$ , such that when new browser installations x come into being, the outputs of F(x) upon them follow a discrete probability density function  $P(f_n)$ ,  $n \in [0, 1, ...N]$ .<sup>3</sup> Recall that the "self-information" or " surprisal" of a particular output from the algorithm is given by:

$$I(F(x) = f_n) = -\log_2\left(P(f_n)\right),\tag{1}$$

The surprisal I is measured here in units of bits, as a result of the choice of 2 as the logarithm base. The *entropy* of the distribution  $P(f_n)$  is the expected value of the surprisal, given by:

$$H(F) = -\sum_{i=0}^{n} P(f_i) \log_2 \left( P(f_i) \right)$$

$$\tag{2}$$

Surprisal can be thought of as an amount of information about the identity of the object that is being fingerprinted, where each bit of information cuts the number of possibilities in half. If a website is regularly visited with equal probability by a set of X different browsers, we would intuitively estimate that a particular browser  $x \in X$  would be uniquely recognisable if  $I(F(x)) \geq \log_2 |X|$ . The binomial distribution could be applied to replace this intuition with proper confidence intervals, but it turns out that with real fingerprints, much bigger uncertainties arise with our estimates of  $P(f_n)$ , at least when trying to answer questions about which browsers are uniquely recognisable. This topic will be picked up again in Section 4.1, after more details on our methodology and results.

In the case of a fingerprint formed by combining several different measurements  $F_s(\cdot), s \in S$ , it is meaningful to talk about the surprisal of any particular measurement, and to define entropy for that component of the fingerprint accordingly:

$$I_s(f_{m,s}) = -\log_2\left(P(f_{m,s})\right) \tag{3}$$

$$H_s(F_s) = -\sum_{i=0}^{n} P(f_{s,i}) \log_2 \left( P(f_{s,i}) \right)$$
(4)

<sup>&</sup>lt;sup>3</sup> Real browser fingerprints are the result of decentralised decisions by software developers, software users, and occasionally, technical accident. It is not obvious what the set of possible values is, or even how large that set is. Although it is finite, the set is large and sparse, with all of the attendant problems for privacy that that poses [15].

Note that the surprisal of two fingerprint components  $F_s$  and  $F_t$  can only be added linearly if the two variables are statistically independent, which tends not to be the case. Instead, conditional self-information must be used:

$$I_{s+t}(f_{m,s}, f_{m,t}) = -\log_2\left(P(f_{m,s} \mid f_{m,t})\right)$$
(5)

Cases like the identification of a Flash blocker by combination of separate plugin and font measurements (see Section 3.1) are predicted accordingly, because  $P(\texttt{fonts} = \texttt{``not detected''} | \texttt{``Flash''} \in \texttt{plugins})$  is very small.

#### 3.3 Data Collection and Preprocessing

We deployed code to collect our fingerprints and report them — along with simple self-information measurements calculated from live fingerprint tallies — at panopticlick.eff.org. A large number of people heard about the site through websites like Slashdot, BoingBoing, Lifehacker, Ars Technica, io9, and through social media channels like Twitter, Facebook, Digg and Reddit.

For each HTTP client that followed the "test me" link at panopticlick. eff.org, we recorded the fingerprint, as well as a 3-month persistent HTTP cookie ID (if the browser accepted cookies), an HMAC of the IP address (using a key that we later discarded), and an HMAC of the IP address with the least significant octet erased.

We kept live tallies of each fingerprint, but in order to reduce double-counting, we did not increment the live tally if we had previously seen that precise fingerprint with that precise cookie ID. Before computing the statistics reported throughout this paper, we undertook several further offline preprocessing steps.

Firstly, we excluded a number of our early data points, which had been collected before the diagnosis and correction of some minor bugs in our client side JavaScript and database types. We excluded the records that had been directly affected by these bugs, and (in order to reduce biasing) other records collected while the bugs were present.

Next, we undertook some preprocessing to correct for the fact that some users who blocked, deleted or limited the duration of cookies had been multi-counted in the live data, while those whose browsers accepted our persistent cookie would not be. We assumed that all browsers with identical fingerprints and identical IP addresses were the same.

There was one exception to the (fingerprint, IP) rule. If a (fingerprint, IP) tuple exhibited "interleaved" cookies, all distinct cookies at that IP were counted as separate instances of that fingerprint. "Interleaved" meant that the same fingerprint was seen from the same IP address first with cookie A, then cookie B, then cookie A again, which would likely indicate that multiple identical systems were operating behind a single firewall. We saw interleaved cookies from 2,585 IP addresses, which was 3.5% of the total number of IP addresses that exhibited either multiple signatures or multiple cookies.

Starting with 1,043,426 hits at the test website, the successive steps described above produced a population of 470,161 fingerprint-instances, with minimal multi-counting, for statistical analysis. Lastly we considered whether over-counting might occur because of hosts changing IP addresses. We were able to detect such IP changes among cookie-accepting browsers; 14,849 users changed IPs, with their subsequent destinations making up 4.6% of the 321,155 IP addresses from which users accepted cookies. This percentage was small enough to accept it as an error rate; had it been large, we could have reduced the weight of every non-cookie fingerprint by this percentage, in order to counteract the over-counting of non-cookie users who were visiting the site from multiple IPs.

#### 4 Results

The frequency distribution of fingerprints we observed is shown in Figure 1. Were the x axis not logarithmic, it would be a strongly "L"-shaped distribution, with 83.6% in an extremely long tail of unique fingerprints at the bottom right, 8.1% having fingerprints that were fairly "non rare", with anonymity set sizes in our sample of 10, and 8.2% in the joint of the L-curve, with fingerprints that were seen between 2 and 9 times.

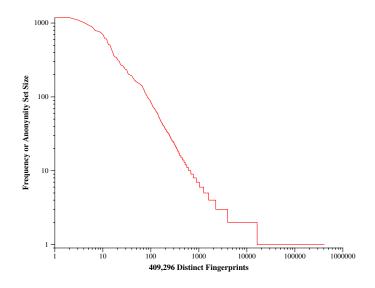


Fig. 1. The observed distribution of fingerprints is extremely skewed, with 83.6% of fingerprints lying in the tail on the right.

Figure 2 shows the distribution of surprisal for different browsers. In general, modern desktop browsers fare very poorly, and around 90% of these are unique. The least unique desktop browsers often have JavaScript disabled (perhaps via NoScript). iPhone and Android browsers are significantly more uniform and harder to fingerprint than desktop browsers; for the time being, these smartphones do not have the variety of plugins seen on desktop systems.<sup>4</sup> Sadly, iPhones and Androids lack good cookie control options like session-cookies-only or blacklists, so their users are eminently trackable by non-fingerprint means.

Figure 3 shows the sizes of the anonymity sets that would be induced if each of our eight measurements were used as a fingerprint on its own. In general, plugins and fonts are the most identifying metrics, followed by User Agent, HTTP Accept, and screen resolution, though all of the metrics are uniquely identifying in some cases.

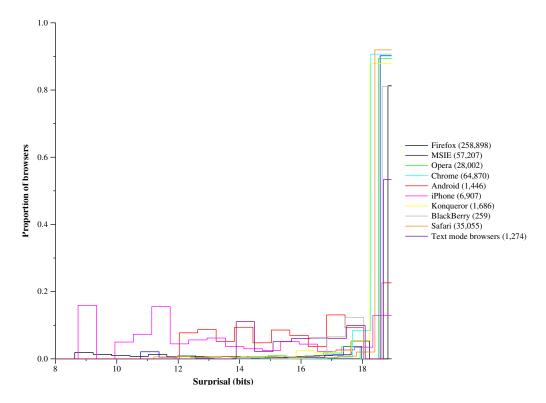


Fig. 2. Surprisal distributions for different categories of browser (believing the User Agent naively; see note 2).

#### 4.1 Global Uniqueness

We know that in the particular sample of browsers observed by Panopticlick, 83.6% had unique fingerprints. But we might be interested in the question of

<sup>&</sup>lt;sup>4</sup> Android and iPhone fonts are also hard to detect for the time being, so these are less fingerprintable

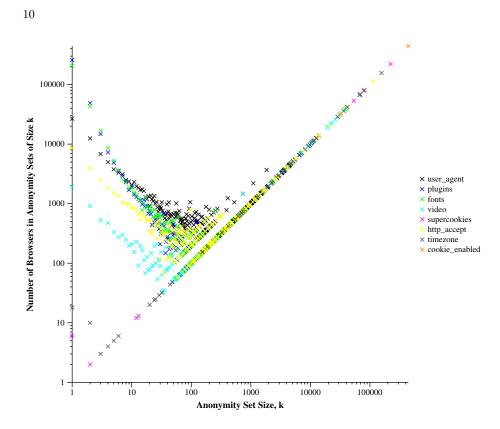


Fig. 3. Number of users in anonymity sets of different sizes, considering each variable separately.

what percentage of browsers in existence are unique, regardless of whether they visited our test website.

Mayer has argued [8] that it is almost impossible to reach any conclusions about the *global* uniqueness of a browser fingerprint, because the multinominal theorem indicates that the maximum likelihood for the probability of any fingerprint that was unique in a sample of size N is:

$$P(f_i) = \frac{1}{N} \tag{6}$$

A fingerprint with this probability would be *far* from unique in the global set of browsers *G*, because G >> N. This may indeed be the maximum subjective likelihood for any single fingerprint that we observe, but in fact, this conclusion is wildly over-optimistic for privacy. If the probability of each unique fingerprint in the sample *N* had been  $\frac{1}{N}$ , the applying the multinomial expansion for 392,938 events of probability  $\frac{1}{N}$ , it would have been inordinately unlikely that we would have seen each of these events precisely once. Essentially, the maximum likelihood approach has assigned a probability of zero for all fingerprints that were not seen in the sample N, when in fact many new fingerprints would appear in a larger sample G.

What we could attempt to meaningfully infer is the global *proportion* of uniqueness. The best way to do that would be to fit a very-long-tailed probability density function so that it reasonably predicts Figure 1. Then, we could employ Monte Carlo simulations to estimate levels of uniqueness and fingerprint entropy in a global population of any given size G. Furthermore, this method could offer confidence intervals for the proposition that a fingerprint unique in N would remain unique in G.

We did not prioritise conducting that analysis for a fairly prosaic reason: the dataset collected at panopticlick.eff.org is so biased towards technically educated and privacy-conscious users that it is somewhat meaningless to extrapolate it out to a global population size. If other fingerprint datasets are collected that do not suffer from this level of bias, it may be interesting to extrapolate from those.

#### 5 How Stable are Browser Fingerprints?

Many events can cause a browser fingerprint to change. In the case of the algorithm we deployed, those events include upgrades to the browser, upgrading a plugin, disabling cookies, installing a new font or an external application which includes fonts, or connecting an external monitor which alters the screen resolution.

By collecting other tracking information alongside fingerprints, we were able to observe how constant or changeable fingerprints were among Panopticlick users. In particular, we used cookies to recognise browsers that were returning visitors, and checked to see whether their fingerprints had changed.

Our observations probably overstate the rate at which fingerprints change in the real world, because the interactive nature of the Panopticlick website encourages to experiment with alterations to their browser configuration.

#### 5.1 Changing Fingerprints as a Function of Time

Among our userbase, rates of fingerprint change for returning cookie-accepting users were very high, with 37.4% of users who visited the site more than once<sup>5</sup> exhibiting more than one fingerprint over time.

The time dependence of fingerprint changes is illustrated in Figure 4, which plots the proportion of fingerprints that was constant among cookies that were seen by Panopticlick exactly twice, with a substantial time interval in between. The population with precisely two time-separated hits was selected because this group is significantly less likely to be actively *trying* to alter their browser fingerprints (we assume that most people experimenting in order to make their browsers unique will reload the page promptly at some point).

<sup>&</sup>lt;sup>5</sup> Our measure of returning visitors was based on cookies, and did not count reloads within 1–2 hours of the first visit.

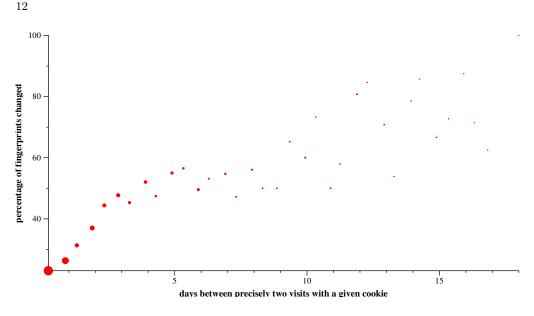


Fig. 4. Proportion of fingerprints that change over given intervals (area of datapoints is proportional to the number of observations encompassed, N = 4,638)

Upon first examination, the high rate of change for fingerprints — even if it overstates the rate of change in the wider Internet population — appears to constitute a powerful protection against fingerprinting attacks.

#### 5.2 Following changing fingerprints

We performed a simple test to see whether a connection can be inferred between the old and new values of fingerprints that change over time.

We implemented a very simple algorithm to heuristically estimate whether a given fingerprint might be an updated or evolved version of a fingerprint seen previously.

The algorithm (set out below) operated on an input fingerprint q, where  $F_i(g), i \in \{1..8\}$  are the 8 fingerprint components illustrated in Table 3.1, and G is the set of all browsers observed in our dataset. The algorithm did not attempt to guess a preceding fingerprint if q indicated that the browser did not have Flash or Java installed.

We ran our algorithm over the set of users whose cookies indicated that they were returning to the site 1–2 hours or more after their first visit, and who now had a different fingerprint. Excluding users whose fingerprints changed because they disabled javascript (a common case in response to visiting panopticlick. eff.org, but perhaps not so common in the real world), our heuristic made a correct guess in 65% of cases, an incorrect guess in 0.56% of cases, and no guess

**Algorithm 1** guesses which other fingerprint might have changed into q

```
candidates \leftarrow []
  for all g \in G do
     for i \in \{1..8\} do
       if for all j \in \{1..8\}, j \neq i : F_i(q) = F_i(q) then
          candidates \leftarrow candidates + (g, j)
       end if
     end for
  end for
  if length(candidates) = 1 then
     q, j \leftarrow \text{candidates}[0]
     if j \in \{\text{cookies}\}, video, timezone, supercookies} then
       return q
     else
       \# j \in \{ \texttt{user\_agent, http\_accept, plugins, fonts} \}
       if SequenceMatcher(F_j(g), F_j(q)).ratio() < 0.85 then
          return q
       end if
     end if
  end if
  return NULL
difflib.SequenceMatcher().ratio() is a Python standard library function for esti-
mating the similarity of strings. We used Python 2.5.4.
```

in 35% of cases. 99.1% of guesses were correct, while the false positive rate was 0.86%. Our algorithm was clearly very crude, and no doubt could be significantly improved with effort.

## 6 Defending Against Fingerprinting

#### 6.1 The Paradox of Fingerprintable Privacy Enhancing Technologies

Sometimes, technologies intended to enhance user privacy turn out to make fingerprinting easier. Extreme examples include many forms of User Agent spoofing (see note 2) and Flash blocking browser extensions, as discussed in Section 3.1. The paradox, essentially, is that many kinds of measures to make a device harder to fingerprint are themselves distinctive unless a lot of other people also take them.

Examples of measures that might be intended to improve privacy but which appear to be ineffective or even potentially counterproductive in the face of fingerprinting include Flash blocking (the mean surprisal of browsers with Flash blockers is 18.7), and User Agent alteration (see note 2). A small group of users had "Privoxy" in their User Agent strings; those User Agents alone averaged 15.5 bits of surprisal. All 7 users of the purportedly privacy-enhancing "Browzar" browser were unique in our dataset. In our dataset, there are some commendable exceptions to this paradox. The TorButton design has evolved to give considerable thought to fingerprint resistance [16] and may be receiving the levels of scrutiny necessary to succeed in that project [14]. NoScript is a useful privacy enhancing technology that seems to reduce fingerprintability.<sup>6</sup>

#### 6.2 Enumeratable Characteristics vs Testable Characteristics

One significant API choice that several plugin and browser vendors made, which appears to strengthen fingerprints tremendously, is offering function calls that enumerate large amounts of information about the system. The navigator.plugins object is one example, and the font lists returned by Flash and Java are another. Microsoft Internet Explorer deserves an honourable mention for not allowing plugin enumeration, and even though we collected version numbers for  $8\frac{1}{2}$  plugins,<sup>7</sup> the plugin entropy on IE was 16.5 bits, somewhat lower than the 17.7 seen in non-IE browsers.

It is hard to see what the Web community is gaining by allowing Java and Flash to read exhaustive system font lists. Any website that cares whether someone has the "False Positive BRK" font installed<sup>8</sup> can surely test for it explicitly.

There are probably stronger ease-of-development arguments for making plugins enumeratable, but the example of IE shows that it is not strictly necessary, and other browsers should perhaps consider moving in IE's direction.

#### 6.3 Fingerprintability $\propto$ Debuggability

A large portion of the entropy we observe in browsers comes from the precise micro-version numbers of all of their plugins. This is somewhat true even in Internet Explorer, where we could not enumerate plugins exhaustively, and were limited to testing the version numbers of 9 common plugins using PluginDetect and custom JavaScript for Acrobat. A similar, though perhaps less severe, problem comes from precise micro-version numbers in User Agent strings.

The obvious solution to this problem would be to make the version numbers less precise. Why report Java 1.6.0\_17 rather than just Java 1.6, or DivX Web Player 1.4.0.233 rather than just DivX Web Player 1.4? The motivation for these precise version numbers appears to be debuggability. Plugin and browser developers want the *option* of occasionally excavating the micro-version numbers of clients when trying to retrospectively diagnose some error that may be present in a particular micro-version of their code. This is an understandable desire, but it should now be clear that this decision trades off the user's privacy against the developer's convenience.

<sup>&</sup>lt;sup>6</sup> We did not try to devise a detection method for NoScript, though they probably exist if users allow scripts from certain important domains.

<sup>&</sup>lt;sup>7</sup> Our version numbers for Acrobat were approximate and limited to the major version number.

<sup>&</sup>lt;sup>8</sup> We noticed that font while grepping through the output of one of our analysis scripts.

There is a spectrum between extreme debuggability and extreme defense against fingerprinting, and current browsers choose a point in that spectrum close to the debuggability extreme. Perhaps this should change, especially when users enter "private browsing" modes.

#### 6.4 Font Orders As An Unnecessary Source of Entropy

When implementing our fingerprinting code, we observed that Adobe Flash not only reports a complete list of fonts that are installed on a system, but reports them in a non-sorted order which appeared to be determined by filesystem inode walk order.

We tested this hypothesis retrospectively, by checking to see if any returning, cookie-accepting users had font lists whose order had changed. We found that only 30 returning browsers had font lists that were different solely with respect to order. Interestingly, these font lists only varied in the ordering of certain fonts from the "Lucida" family, and there was a related population of about 200 browsers where the same fonts varied in ordering and surrounding whitespace. All of these browsers had Mac OS X User Agent strings, so we concluded that some application on OS X overwrites these font files, either during upgrades or at other times. Aside from this group, our hypothesis that font list orderings were stable turned out to be correct.

Next, we investigated whether a substantial reduction in font list entropy could be achieved if plugins like Flash and Java began sorting these lists before returning them via their APIs. Among browsers where the fonts were detectable, the entropy of the fonts variable was 17.1 bits. We recalculated this quantity after sorting to be 16.0, a decrease of only 1.1 bits. Confounding this calculation slightly is the fact that the maximum possible entropy we could detect for either of these numbers, given our dataset, was only 18.4. It is possible that sorting the font lists would have made a much larger difference if the sample size had been large enough for the font entropy and its conceivable ceiling to diverge further.

In contrast to the font case, our pre-launch testing seemed to indicate that the ordering of **navigator.plugins** was not stable in all browsers, so, as noted in Table 3.1, we sorted the plugin list before recording it. We subsequently read Jonathan Mayer's claims that Mozilla actually exposes two different plugin orderings based on *different* inode timestamps [8]. Unfortunately, having sorted our plugin dataset, we cannot test his claims.

#### 7 Conclusions

We implemented and tested one particular browser fingerprinting method. It appeared, in general, to be very effective, though as noted in Section 3.1 there are many measurements that could be added to it.

Browser fingerprinting is a powerful technique, and fingerprints must be considered alongside cookies, IP addresses and supercookies when we discuss web privacy and user trackability. Although fingerprints turn out not to be particularly stable, browsers reveal so much version and configuration information that they remain overwhelmingly trackable. There are implications both for privacy policy and technical design.

Policymakers should start treating fingerprintable records as potentially personally identifiable, and set limits on the durations for which they can be associated with identities and sensitive logs like clickstreams and search terms.

The Tor project is noteworthy for already considering and designing against fingerprintability. Other software that purports to protect web surfers' privacy should begin to do likewise, and we hope that the test site at panopticlick.eff. org may prove useful for this purpose. Browser manufacturers should also consider what they can do to reduce fingerprintability, particularly at the JavaScript API level.

We identified only four groups of browser with good resistance to fingerprinting: those that block JavaScript, those that use TorButton, cloned systems behind shared firewalls, and certain types of smartphone. It is possible that other such categories exist in our data.

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## A Appendix : Some Dataset Queries of Interest

(lots more of these, and better formatted, coming with the real paper ;)

Variable	Value				
User Agent	Mozilla/5.0 (X11; U; Linux i686; en-US; rv:1.9.1.7) Gecko/20100106				
	Ubuntu/9.10 (karmic) Firefox/3.5.7				
HTTP ACCEPT head-	text/html, */* ISO-8859-1,utf-8;q=0.7,*;q=0.7 gzip,deflate en-				
ers	us,en;q=0.5				
Cookies enabled?	Yes				
Screen resolution	1280x800x24				
Timezone	300				
Browser plugins	Plugin 0: DivX Web Player; DivX Web Player version 1.4.0.233; libtotem-mully-plugin.so; (AVI video; video/divx;				
	divx). Plugin 1: QuickTime Plug-in 7.2.0; The <a href="http://www.gnome.org/projects/totem/">Totem</a> 2.28.2				
	plugin handles video and audio streams.; libtotem-narrowspace-plugin.so; (QuickTime video; video/quicktime; mov)				
	(MPEG-4 video; video/mp4; mp4) (MacPaint Bitmap image; image/x-macpaint; pntg) (Macintosh Quickdraw/PICT				
	drawing; image/x-quicktime; pict, pict1, pict2) (MPEG-4 video; video/x-m4v; m4v). Plugin 2: Shockwave Flash;				
	Shockwave Flash 10.0 r42; libflashplayer.so; (Shockwave Flash; application/x-shockwave-flash; swf) (FutureSplash				
	Player; application/futuresplash; spl). Plugin 3: VLC Multimedia Plugin (compatible Totem 2.28.2); The <a< td=""></a<>				
	href="http://www.gnome.org/projects/totem/">Totem 2.28.2 plugin handles video and audio streams.; libtotem-cone-				
	plugin.so; (VLC Multimedia Plugin; application/x-vlc-plugin; ) (VLC Multimedia Plugin; application/vlc; ) (VLC Multimedia				
	Plugin; video/x-google-vlc-plugin; ) (Ogg multimedia file; application/x-ogg; ogg) (Ogg multimedia file; application/ogg;				
	ogg) (Ogg Audio; audio/ogg; oga) (Ogg Audio; audio/x-ogg; ogg) (Ogg Video; video/ogg; ogv) (Ogg Video; video/x-				
	ogg; ogg) (Annodex exchange format; application/annodex; anx) (Annodex Audio; audio/annodex; axa) (Annodex Video;				
	video/annodex; axv) (MPEG video; video/mpeg; mpg, mpeg, mpe) (WAV audio; audio/wav; wav) (WAV audio; audio/x-wav;				
	wav) (MP3 audio; audio/mpeg; mp3) (NullSoft video; application/x-nsv-vp3-mp3; nsv) (Flash video; video/flv; flv) (Totem				
	Multimedia plugin; application/x-totem-plugin; ). Plugin 4: Windows Media Player Plug-in 10 (compatible; Totem); The <a< td=""></a<>				
	href="http://www.gnome.org/projects/totem/">Totem 2.28.2 plugin handles video and audio streams.; libtotem-gmp-				
	plugin.so; (AVI video; application/x-mplayer2; avi, wma, wmv) (ASF video; video/x-ms-asf-plugin; asf, wmv) (AVI video;				
	video/x-msvideo; asf, wmv) (ASF video; video/x-ms-asf; asf) (Windows Media video; video/x-ms-wmv; wmv) (Windows				
	Media video; video/x-wmv; wmv) (Windows Media video; video/x-ms-wvx; wmv) (Windows Media video; video/x-ms-wm;				
	wmv) (Windows Media video; video/x-ms-wmp; wmv) (Windows Media video; application/x-ms-wms; wms) (Windows Me-				
	dia video; application/x-ms-wmp; wmp) (Microsoft ASX playlist; application/asx; asx) (Windows Media audio; audio/x-ms-				
	wma; wma).				
System fonts	wasy10, UnDotum, Century Schoolbook L, OpenSymbol, msam10, Mukti Narrow, Vemana2000, KacstQurn, Umpush, De-				
	jaVu Sans Mono, Purisa, msbm10, KacstBook, KacstLetter, cmr10, Norasi, Loma, KacstDigital, KacstTitleL, mry_KacstQurn,				
	URW Palladio L, Phetsarath OT, Sawasdee, Tlwg Typist, URW Gothic L, Dingbats, URW Chancery L, FreeSerif, ori1Uni,				
	KacstOffice, DejaVu Sans, VL Gothic, Kinnari, KacstArt, TlwgMono, Lohit Punjabi, Symbol, Bitstream Charter, KacstOne,				
	Courier 10 Pitch, cmmi10, WenQuanYi Zen Hei Mono, Nimbus Sans L, TlwgTypewriter, VL PGothic, Rachana, Standard				
	Symbols L, Lohit Gujarati, kacstPen, KacstDecorative, Nimbus Mono L, Mallige, Nimbus Roman No9 L, KacstPoster, Mukti				
	Narrow, WenQuanYi Zen Hei, FreeSans, cmex10, KacstNaskh, Lohit Tamiil, Tlwg Typo, UnBatang, KacstFarsi, Waree, Kac-				
	stTitle, Lohit Hindi, DejaVu Serif, Garuda, KacstScreen, FreeMono, URW Bookman L, cmsy10 (via Flash)				
· · ·	DOM localStorage: Yes, DOM sessionStorage: Yes, IE userData: No				
tests					

 Table 2. A typical Panopticlick fingerprint

User Agent	Cookies?	Video, Timezone, Plugins, Fonts, Supercookies	Frequency
Mozilla/5.0 (Windows; U; Windows NT 5.1; en-US; rv:1.9.1.7) Gecko/20091221 Fire-	Yes	no javascript	1186
fox/3.5.7			
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us) AppleWebKit/528.18	No	no javascript	1100
(KHTML, like Gecko) Mobile/7D11			
Mozilla/5.0 (Windows; U; Windows NT 6.1; en-US; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	1017
Mozilla/5.0 (Windows; U; Windows NT 5.1; en-US; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	940
Mozilla/5.0 (Windows; U; Windows NT 5.1; en-US; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	886
(.NET CLR 3.5.30729)			
Mozilla/5.0 (Windows; U; Windows NT 5.1; de; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	788
(.NET CLR 3.5.30729)			
Mozilla/5.0 (Windows; U; Windows NT 6.1; de; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	775
Mozilla/5.0 (Windows; U; Windows NT 5.1; de; rv:1.9.2) Gecko/20100115 Firefox/3.6	Yes	no javascript	746
Mozilla/5.0 (Windows; U; Windows NT 6.1; en-US; rv:1.9.1.7) Gecko/20091221 Fire-	Yes	no javascript	702
fox/3.5.7			
Mozilla/5.0 (Windows; U; Windows NT 5.1; de; rv:1.9.1.7) Gecko/20091221 Firefox/3.5.7	Yes	no javascript	618
(.NET CLR 3.5.30729)			

Table 3. 10 Largest Anonymity Sets

User Agent	Cookies?	Video	Timezone	Frequency
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us)	Yes	320x396x32	480	345
AppleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11				
Safari/528.16				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; de-de)	Yes	320x396x32	-60	280
AppleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11				
Safari/528.16				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us)	Yes	320x396x32	360	225
AppleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11				
Safari/528.16				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us)	Yes	320x396x32	0	150
AppleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11				
Safari/528.16				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; de-de)	Yes	320x396x32	-60	149
AppleWebKit/528.18 (KHTML, like Gecko) Mobile/7D11				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3-1-2 like Mac OS X; en-us)	Yes	320x396x32	480	149
AppleWebKit/528.18 (KHTML, like Gecko) Mobile/7D11				
Mozilla/5.0 (iPod; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us) Ap-	Yes	320x396x32	300	145
pleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11 Sa-				
fari/528.16				
Mozilla/5.0 (iPhone; U; CPU iPhone OS 3_1_2 like Mac OS X; en-us)	Yes	320x396x32	0	114
AppleWebKit/528.18 (KHTML, like Gecko) Mobile/7D11				
Mozilla/5.0 (Linux; U; Android 2.0.1; en-us; Droid Build/ESD56)	Yes	480x854x32	300	112
AppleWebKit/530.17 (KHTML, like Gecko) Version/4.0 Mobile Sa-				
fari/530.17				
Mozilla/5.0 (iPod; U; CPU iPhone OS 3_1_2 like Mac OS X; de-de) Ap-	Yes	320x396x32	-60	97
pleWebKit/528.18 (KHTML, like Gecko) Version/4.0 Mobile/7D11 Sa-				
fari/528.16				

Table 4. 10 Largest Anonymity Sets with Javascript