A Window into Internet of Things
Privacy:
Privacy Ratings for Internet-Enabled Health and Medical Devices

Ian Douglas
Office of the Privacy Commissioner of Canada
Technology Analysis Directorate
Taking a pulse on IoT

Proactive initiative
  – Research
  – Observation
Educate and guide
  – No enforcement actions
Prescription Used

Procedures
- Data in motion
  - interception
- Data at rest
  - storage
- Security
  - SDK
  - Passwords
  - Versions used
  - Pairing
- Practices
  - Passwords and keys
  - Always On

The 10 Principles
1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance
Observation

Limiting Collection
  - Number of data elements gathered

Limiting Disclosure
  - Number of third parties data shared with

Safeguards
  - Security of data stored and transmitted

Individual Access
  - Ability to modify or delete data

Consent
  - Number of optional vs mandatory elements
Prognosis

Scoring overview
Amount of data collected was varied
Sharing was not as high as we expected
Well established medical companies had better safeguards
Scrubbing data not always easy or possible
Controls over what was collected was not good