

# From Identifiable to Anonymous:

How Technical Measures Reshape the Legal Status of Personal Data

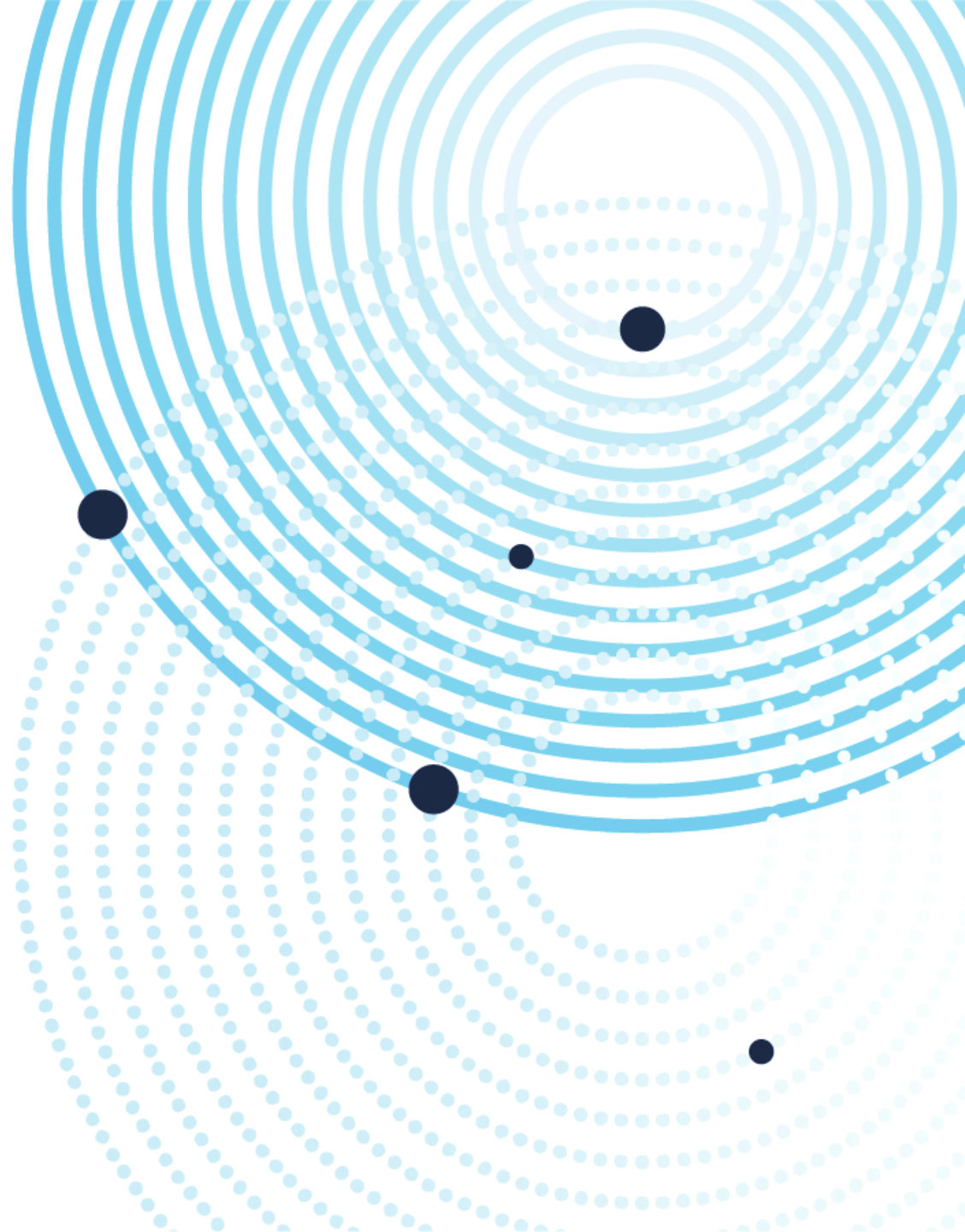
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The background features a series of concentric, light blue circles that create a ripple effect. These circles are centered and fill most of the frame. A dotted border of small, light blue circles follows the outer edge of the concentric pattern, framing the central text.

GDPR is technology-agnostic by design.

# Personal. Or anonymous.

Recital 26. No middle ground  
& no, pseudonymous is not in the middle...



# Four families of technical measures

## Reduce **direct** identifiability

Hashing, tokenisation, masking, encryption.

*Affects direct identifiers and limits direct identification*

## Reduce **indirect** identifiability

k-anonymity, l-diversity, t-closeness, generalisation, suppression.

*Attack the quasi-identifier problem.*

## Add noise or **synthesise**

Differential privacy, synthetic data generation.

*Enabling analysis, model training, and data sharing by protecting individuals at the data level.*

## Architectural & **organisational**

Key separation, access controls, contractual prohibitions on re-identification.

*Don't change the data itself, but change the data environment.*

# The controller decides. The law(maker) shrugs...

- What is good enough? Is it still the same thing as in 2014?  
*[WP 29 05/2014]*
- Good enough for whom?  
*[Single Resolution Board v European Data Protection Supervisor (CJEU, Case C-413/23 P)]*
- *Is there anything I can rely on?*





**Thank you!**

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