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Automated Analysis of Privacy Requirements for Mobile Apps

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https://www.usableprivacy.org/
Motivation

• “Google Play requires developers to provide a valid privacy policy when the app requests or handles sensitive user or device information.” (Google Play Developer E-Mail, Feb ’17)

• The California Online Privacy Protection Act also requires app publishers to have a privacy policy and transparently disclose data practices (California Business and Professions Code Sections 22575-22579)

→ System to evaluate how many apps have a privacy policy, whether the policies follow privacy requirements, and analyze discrepancies between apps and policies to increase transparency at scale
Compare App Behavior/Code to Policy Text

Privacy Policies

Mobile Apps

Policy Analysis (Machine Learning)

App Analysis (Static Code Analysis)

Compliance with Privacy Requirements

https://www.usableprivacy.org/
Analysis Techniques

```python
def location_feature_extraction(policy):
    data_type_keywords = ['geo', 'gps']
    action_keywords = ['share', 'partner']
    relevant_sentences = ''
    feature_vector = ''

    for sentence in policy:
        for keyword in data_type_keywords:
            if (keyword in sentence):
                relevant_sentences += sentence

    words = tokenize(relevant_sentences)
    bigrams = ngrams(words, 2)

    for bigram in bigrams:
        for keyword in action_keywords:
            if (keyword in bigram):
                feature_vector += bigram, bigram[0], bigram[1]

    return feature_vector
```

Permission Extraction

Call Graph Creation

Call ID Analysis

Binary Classifiers

Policy Analysis

APP Analysis
What are privacy requirements?

1. Apps must have a privacy policy

2. Policies have to describe data practices occurring in the apps (e.g., describe how location data is shared with third parties) and must not omit any practice

3. Apps must follow the described practices
Dataset

- 17,991 free apps from the Google Play Store and their metadata (e.g., whether an app has a policy link or the number of reviews)
- Started crawl from most popular apps in each category and followed links to similar apps
Potential Privacy Requirement Non-Compliance

Apps have Policy link?  Apps need policy?

No (PII not processed)  No (Policy Elsewhere)  Yes

17,991  8,696  12%
9,295  7,676  17%
0  6,198  71%

Approximately 1/3 of apps appear to have no privacy policy despite processing PII.
## Potential Privacy Requirement Non-Compliance

<table>
<thead>
<tr>
<th>Practice</th>
<th>Precision (Test Set; (n=40))</th>
<th>Recall (Test Set; (n=40))</th>
<th>F-1 (Test Set; (n=40))</th>
<th>% Potential Privacy Requirement Non-compliance ((n=9K))</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notice of Policy Changes</td>
<td>0.96</td>
<td>0.89</td>
<td>0.93</td>
<td>46%</td>
</tr>
<tr>
<td>Collection of Identifiers</td>
<td>0.75</td>
<td>1</td>
<td>0.86</td>
<td>50%</td>
</tr>
<tr>
<td>Sharing of Location</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>17%</td>
</tr>
<tr>
<td>Sharing of Contact</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2%</td>
</tr>
</tbody>
</table>

→ Potential privacy requirement non-compliance can be predicted reliably and at scale
Potential Privacy Requirement Non-Compliance

- Each app exhibits a mean of **1.83 instances of potential privacy requirement non-compliance**
- Non-compliance does not necessarily mean that a law is violated; manual verification required
Potential Privacy Requirement Non-Compliance

→ Use app metadata to predict which app populations have increased probability of potential privacy requirement non-compliance
Concluding Thoughts

- Help developers, app store owners, and regulators; implement our system into their workflow
- Current system piloted by the Office of the California Attorney General
- Extensions towards other use cases, particularly, in the emerging Internet of Things domain

Thank you!