

Top 10 Privacy Risks

Alpha Version 1.0

Website Application Vulnerabilities

Vulnerability is a key problem in any system that guards or operates on sensitive user data. Failure to suitably design and implement an application, detect a problem or promptly apply a fix (patch) is likely to result in a privacy breach. This risk also encompasses the OWASP Top 10 List of web application vulnerabilities and the risks resulting from them.



Frequency: High Impact: Very High





Frequency: High Impact: Very High



Operator-sided Data Leakage

Failure to prevent the leakage of any information containing or related to user data, or the data itself, to any unauthorized party resulting in loss of data confidentiality. Introduced either due to intentional mistake e.g. caused by insufficient access management controls, insecure storage, duplication of data or a lack of awareness.

Insufficient Data Breach Response

Not informing the affected persons (data subjects) about a possible breach or data leak, resulting either from intentional or unintentional events; failure to remedy the situation by fixing the cause; not attempting to limit the leaks.







Frequency: High Impact: Very <u>High</u>



Insufficient Deletion of Personal Data

Failure to effectively and/or timely delete personal data after termination of the specified purpose or upon request.















Frequency: Very High Impact: High



Non-transparent Policies, Terms and **Conditions**





Not providing sufficient information to describing how data is processed, such as its collection, storage, and processing. Failure to make this information easily-accessible and understandable for non-lawyers.

Frequency: Very High Impact: High



Collection of data not required for the primary purpose

Collecting descriptive, demographic or any other user-related data that are not needed for the purposes of the system. Applies also to data for which the user did not provide consent.

Frequency: Very High Impact: High



Sharing of Data with Third Party



Providing user data to any third-party, without obtaining the user's consent. Sharing results either due to transfer or exchanging for a monetary compensation or otherwise due to inappropriate use of third-party resources included in the web site like widgets (e.g. maps, social networks buttons), analytics or web bugs (e.g. beacons).



Frequency: High Impact: High







Outdated personal data The use of outdated, incorrect or bogus user data. Failure to update or correct the data.

Frequency: High Impact: Very High



Missing or insufficient Session Expiration





Failure to effectively enforce session termination. May result in collection of additional user-data without the user's consent or awareness.

Frequency: Medium Impact: Very High



Insecure Data Transfer

Failure to provide data transfers over encrypted and secured channels, excluding the possibility of data leakage. Failure of enforcing mechanisms limiting the leak surface, e.g. allowing to infer any user data out of the mechanics of Web application operation.

