

From: Ted Myerson
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I would like to submit the following comment for today's public meeting of the Data Privacy and Integrity Advisory Committee:

Anonos applauds the DHS's focus on reviewing advanced PETs in the rapid age of Digital Transformation. There is no one solution that will solve every use case; however, we recommend that the DHS research the benefits of Dynamic Pseudonymization technology as recently recognized by the World Economic Forum (WEF), the European Data Protection Supervisor (EDPS), and the European Data Protection Board (EDPB), as one of the most cutting-edge tools to eliminate unnecessary tradeoffs between data privacy and utility. It is the most advanced form of Data Protection by Design and by Default. It is one of the DHS's top priorities to evaluate technology that is more than just "by design" but rather is implemented at the earliest possible point by default. Just as data use is dynamic in today's digital world, effective data protection must be dynamic to protect data when in use so it can safely travel beyond companies' perimeters for protected processing in the cloud and for sharing and combining among partners and organizations.

The EDPB and EDPS have highlighted Pseudonymisation as the solution to lawfully transfer data internationally and lawfully process EU data in US-operated clouds. Additionally, the WEF has highlighted Pseudonymisation as a Fourth Industrial Revolution technology capable of resolving conflicts between data use and protection. Dynamic Pseudonymisation technology enables surveillance proof processing while maintaining maximum utility and 100% accuracy of the data when compared to processing unprotected cleartext. Some of the significant benefits of Dynamic Pseudonymisation are that it does not require the same heavy processing or transmission capabilities as Homomorphic Encryption or Multi-Party Computing and can be used in the most advanced analytics such as AI and ML without compromising speed, utility or accuracy. The dynamism defeats unauthorized relinking to identity via the [Mosaic Effect](http://www.MosaicEffect.com) (www.MosaicEffect.com).

Any long-term sustainable approach to balancing data value, protection, and national security should include Dynamic Pseudonymization satisfying the heightened requirements and delivering the significant benefits recently highlighted by the EDPS, EDPB, and the WEF.

Best,
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