






# Comparative Table of Anonymization and De-Identification Definitions

	 Canada	 Quebec	 Alberta & British Columbia	 California	 European Union	
	<i>Personal Information Protection and Electronic Documents Act</i>	<i>Consumer Privacy Protection Act, as proposed in Bill C-27</i>	<i>Act respecting the protection of personal information in the private sector, as modified per Act 25</i>	<i>Personal Information Protection Act</i>	<i>Consumer Privacy Act</i>	<i>General Data Protection Regulation</i>
Anonymize	<ul style="list-style-type: none"> <li>No definition</li> <li>Anonymization is provided as an alternative to destruction or erasure of personal information when it is no longer required [Sch.1- 4.5.3]</li> </ul>	<ul style="list-style-type: none"> <li>“Anonymize” means to irreversibly and permanently modify personal information, in accordance with generally accepted best practices, to ensure that no individual can be identified from the information, whether directly or indirectly, by any means [s. 2]</li> <li>Anonymization is provided as a means of disposing of personal information [s. 2]</li> </ul>	<ul style="list-style-type: none"> <li>Information concerning a natural person is anonymized if it is, at all times, reasonably foreseeable in the circumstances that it irreversibly no longer allows the person to be identified directly or indirectly [s. 23]</li> <li>Information must be anonymized according to generally accepted best practices and according to the criteria and terms determined by regulation [s. 23]</li> <li>Anonymization is provided as an alternative to destruction of personal information when the purposes for which it was collected or used are achieved, provided that anonymized information is used for serious and legitimate purpose [s. 23]</li> </ul>	<ul style="list-style-type: none"> <li>No definition</li> </ul>	<ul style="list-style-type: none"> <li>No definition</li> </ul>	<ul style="list-style-type: none"> <li>Anonymous information is information which does not relate to an identified or identifiable natural person or personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable [Recital 26].</li> <li>Anonymized data is data that has been irreversibly prevented from being used to identify an individual [Opinion of the Data Protection Working Party on Anonymisation Techniques, 0829/14/EN WP 216, at 7 (adopted April 10, 2014)]</li> </ul>
De-identify	<ul style="list-style-type: none"> <li>No definition</li> </ul>	<ul style="list-style-type: none"> <li>“De-identify” means to modify personal information so that an individual cannot be directly identified from it, though a risk of the individual being identified remains [s. 2]</li> <li>De-identified information is personal information except in certain cases, most notably in connection with research, business transactions, and certain rights of individuals. [s. 2(3)]</li> </ul>	<ul style="list-style-type: none"> <li>Information is de-identified if it no longer allows the person concerned to be directly identified [s. 12]</li> <li>When using de-identified information, reasonable steps must be taken to limit the risk of someone identifying a natural person using de- identified information [s. 12]</li> </ul>	<ul style="list-style-type: none"> <li>No definition</li> </ul>	<ul style="list-style-type: none"> <li>“Deidentified” means information that cannot reasonably identify, relate to, describe, be capable of being associated with, or be linked, directly or indirectly, to a particular consumer, provided that a business that uses deidentified information:                         <ol style="list-style-type: none"> <li>Has implemented technical safeguards that prohibit reidentification of the consumer to whom the information may pertain.</li> <li>Has implemented business processes that specifically prohibit reidentification of the information.</li> <li>Has implemented business processes to prevent inadvertent release of deidentified information.</li> <li>Makes no attempt to reidentify the information [Cal. Civ. Code § 1798.140(h)].</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>“Pseudonymisation” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person [s. 4(5)]</li> </ul>