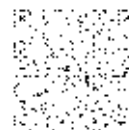


隱私防護資料發布資訊系統之 保護剖繪初論：根基於 個人資料去識別化的議題

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摘要

《個人資料保護法施行細則》第17條闡明：「……所稱資料經過處理後或依其揭露方式無從識別當事人，指個人資料以代碼、匿名、隱藏部分資料或其他方式，無從辨識該特定個人」，亦即通知「去識別化」（de-identification）之議題。然而，隨著資訊公開的呼聲，去識別化除需保護當事人隱私資料外，也需公開足夠資訊以利資料分析。自2014年11月17日法務部法律字第10303513040號函之函釋：「去識別化之個人資料依其呈現方式已無從直接或間接識別該特定個人者即非屬個人資料」起，制定相關標準的需求已更顯重要。根基於此，本文探討國際標準組織（International Organization for Standardization, ISO）於此議題的標準化作業之全景與我國宜實做的驗證方案中之保護剖繪。

關鍵詞：保護剖繪、個人可識別資訊去識別化、個人資料管理系統、資訊安全管理系統、標準化

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Privacy Data Protection Profile on Information System Data Released: Based on Personal Data De-identification Issue

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Abstract

Enforcement Rules of the Personal Information Protection Act Article 17 states that “...the Act shall mean the personal information processed by ways of code, anonymity, hiding parts of information or other manners so as to fail to identify such a specific person,” known as the “De-identification” issue. However, with the call for Information disclosure, de-identification data needs not only to protect personal privacy but also offer sufficient information for data analysis. On 2014 Nov 17th, the Ministry of Justice has explained that “De-identified personal information shall not identify directly or in-directly a specified individual.” Since then, related standardization has become more and more important. Thus, in this article we discuss what ISO’s standardize work and what we should do protection profile of certifications.

Keywords: protection profile (PP), personally identifiable information (PII) de-identification, personally information management system (PIMS), information security management system (ISMS), standardization

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