Network Security and Applied Cryptography Laboratory

http://crypto.cs.stonybrook.edu

Towards Regulatory Compliance in Data Management

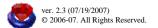
Tutorial @ VLDB 2007

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Finance

National Association of Insurance Commissioners, **Graham-Leach-Bliley Act**, 1999; The U.S. Securities and Exchange Commission, **Rule 17a-3&4, 17 CFR Part 240**: Electronic Storage of Broker-Dealer Records, 2003; U.S. Public Law No. 107-204, 116 Stat. 745, The Public Company Accounting Reform and Investor Protection Act, 2002 (**Sarbanes-Oxley**)

Healthcare

U.S. Dept. of Health & Human Services, The Health Insurance Portability and Accountability Act (**HIPAA**), 1996; The U.S. Department of Health and Human Services Food and Drug Administration, **21 CFR Part 11**: Electronic Records and Signature Regulations 1997

Government

U.S. Public Law 107-347. The E-Government Act, 2002 (Federal Information Security Management Act **FISMA**); The U.S. Department of Defense, **Directive 5015.2**: DOD Records Management Program, 2002; The U.S. Department of Education. 20 U.S.C. 1232g; 34 CFR Part 99:The Family Educational Rights and Privacy Act (**FERPA**), 1974

Towards Regulatory Compliance in Data Management (VLDB 2007)

Title I

Continuing health insurance coverage.

Title II

- Privacy Rule (all PHI)
- Transactions and Code Sets Rule
- Security Rule (electronic PHI)
 - Safeguards
 - administrative (policies and procedures)
 - physical
 - technical safeguards
- Unique Identifiers Rule
- Enforcement Rule

SEC. 1173 (d) ("Security Standards for Health Information") mandates: "safeguards [...] to **ensure the integrity and confidentiality** [...] of the information" and "to protect against any reasonably anticipated [...] threats or hazards to the [...] integrity of the information" (e.g., once stored).

http://www.cms.hhs.gov/HIPAAGenInfo/Downloads/HIPAALaw.pdf



Hardware

Tamper-resistance, magnetic Residues, emanations

OS

I/O device drivers and kernel

Storage

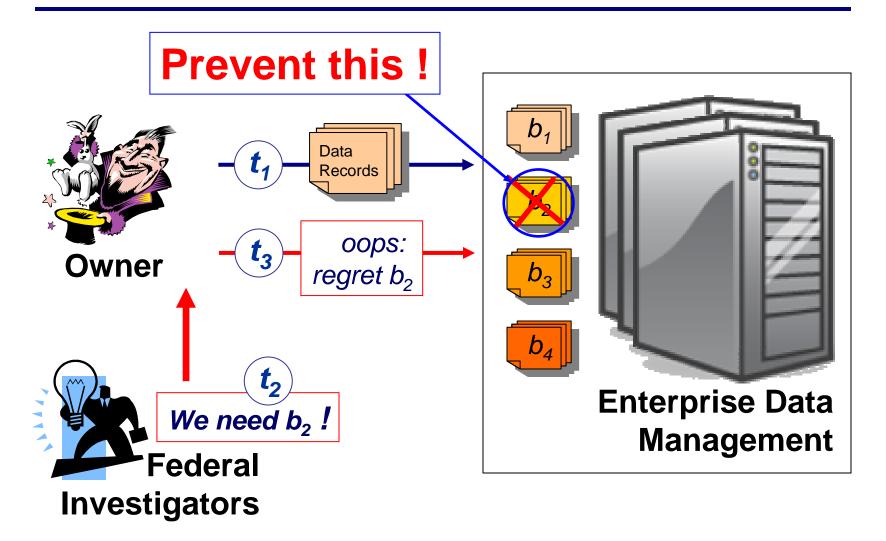
Block level: <u>WORM assurances</u>, secure migration (1) FS level: <u>secure indexing</u>, <u>secure deletion</u>, secure provenance, history independent data structures, secure migration (2)

Databases

History Independence – novel indexing ACID still holds ?

Networks

Physical level: wireless spectrum sharing behavior Packet level: anti-spam, flow labeling



We do not prevent history. Just history rewriting.

A bit artificial in scope – why do we trust the owner to correctly log the entries and then mistrust her later ? If I were a malicious owner, I would simply not log suspicious emails ©

Do we trust owner for the next 5 minutes too ?

What is $\Delta t = t_3 - t_1$ ("time warp")? If we know this, we can deploy all kinds of optimizations.

Trustworthy Indexing. Really a problem ?

Not sure it is much of a problem ("*outside of very high latency media*" - Xiaonan Ma @ IBM Almaden). Investigators can simply come in and first do a checksum of the entire store in the background, as investigations usually last months/years.

Secure Deletion.

Is a problem only if trustworthy indexing is required.

Secure Migration.

Relatively straightforward. Build trust chain, deal with obsolete encryption, lack of keys.

Litigation support.

Need to make sure retention can be prolonged in the case of an ongoing litigation.

Tape-based

Assumption: specific reader is used. Checksums (keyed) are written onto tape. Keys are managed inside readers.

Optical Disks

Problem: physical storage space, cost, replication attacks, high latency. No secure deletion.

Hard Disks Main problem: "soft"-ware.

DLTSage WORM

Assurances of the tape systems are provided under the assumption that compliant tape-readers are deployed. "DLTSage WORM provides features to assure compliance, placing an electronic key on each cartridge to ensure WORM integrity. This unique identifier cannot be altered, providing a tamperproof archive cartridge that meets stringent compliance requirements to ensure integrity protection and full accessibility with reliable duplication."

Sony Disk for Data

Holds only 23 GB per disk side. Because it is faster than tape and cheaper than hard disks, optical WORM storage technology is often deployed as a secondary, high-latency storage medium to be used in the framework of a hard diskbased solution. Care needs to be taken in establishing points of trust and data integrity when information leaves the secured hard disk store for the optical media.



EMC Centera

Content addressed storage (CAS) <u>software</u> solution with regulatory compliance capabilities. Data records have "two components: the content and its associated content descriptor file (CDF) that is directly linked to the stored object [...] A digital fingerprint derived from the content itself is the content 's locator. [...]

The CDF is used for access to and management of the record. Within this CDF, the application will assign a retention period for each individual business record. Centera will permit deletion of a pointer to a record upon expiration of the retention period. Once the last pointer to a record has been so deleted, the object will be eliminated", and, in the Plus version, also "shredded" (from the media).

Hitachi Message Archive for Compliance

The Data Retention Utility is a software-based "virtual" WORM mechanism for mainstream Hitachi storage systems. It allows customers to "lock down archived data, making it non-erasable and non-rewritable for prescribed periods, facilitating compliance with governmental or industry regulations".

IBM LockVault compliance software

Software layer that operates on top of IBM System Storage N series to provide "disk-based regulatory compliance solutions for unstructured data".

IBM System Storage Archive Manager

The IBM Tivoli Storage Manager is part of the IBM Total Storage Software and provides certain software data retention protection. It "makes the deletion of data before its scheduled expiration extremely difficult. Short of physical destruction to storage media or server, or deliberate corruption of data or deletion of the Archive Manager database, Archive Manager will not allow data [...] to be deleted before its scheduled expiration date."

Snaplock Compliance/Enterprise Software

A software suite designed to work on top of NetApp NearStore and FAS storage systems. It provides soft-WORM assurances, "preventing critical files from being altered or deleted until a specified retention date". As opposed to other vendors, NetApp SnapLock supports open industry standard protocols such as NSF and CIFS.



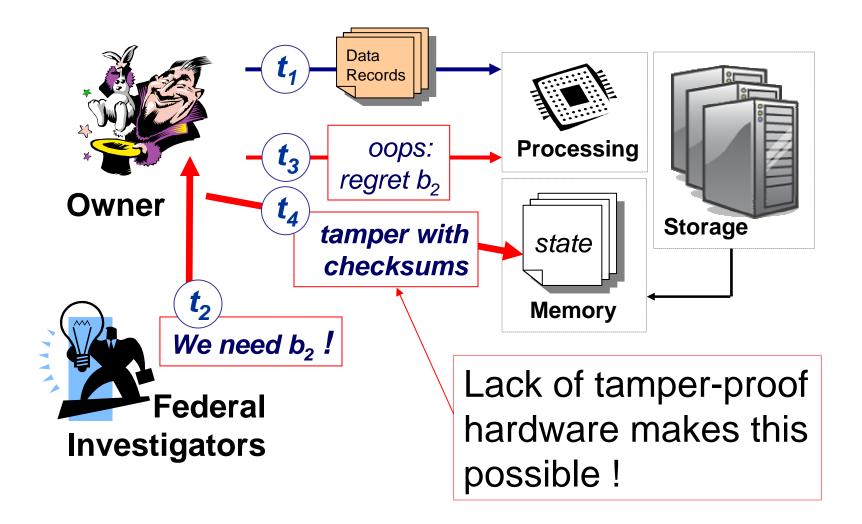
StorageTek Compliance Archiving Software

Software that runs on top of the Sun StorageTek 5320 NAS Appliance to "provide compliance-enabling features for authenticity, integrity, ready access, and security".



"soft"-WORM

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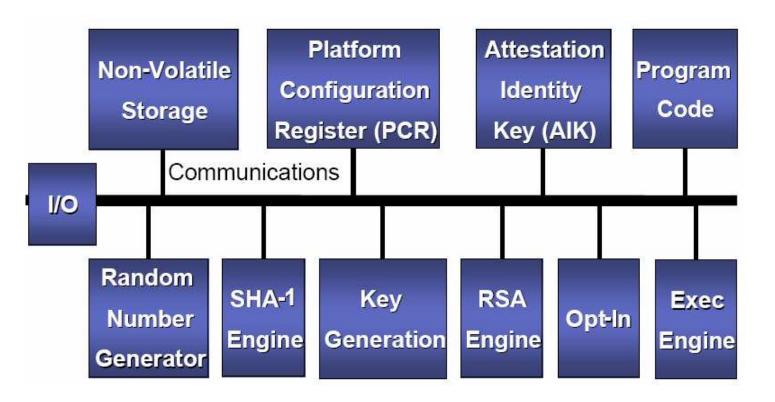
Tamper-proof Hardware.

Achieving WORM in the absence of tamper-proof hardware is not possible.

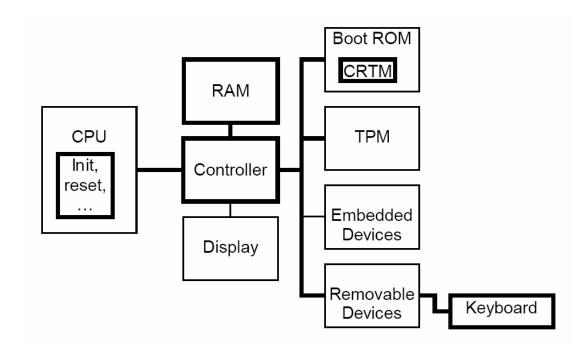
Q: What kind of tamper-proof hardware ?



Microcontroller that stores keys, passwords and digital certificates.



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Can the Trusted Platform Module control what software runs? No. [... it] can only act as a 'slave' to higher level services and applications by storing and reporting pre-runtime configuration information. [...] At no time can the TCG building blocks 'control' the system or report the status of applications that are running. The <u>passive</u> nature of a TPM would require an additional point of blank trust in upper layer code. The ability to virtualize makes this hard to achieve.

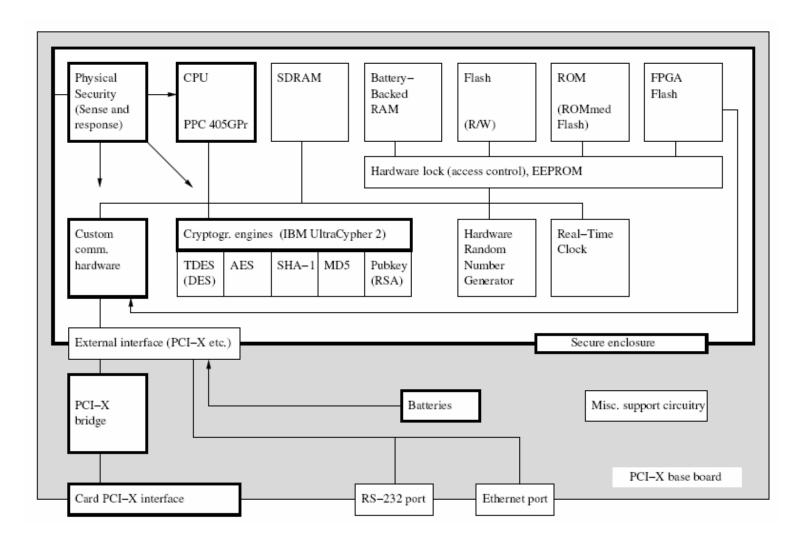
Discussion: How would Mallory fake a world view to the TPM. Remember we are talking about *millions of US dollars* worth of incentives here.

And by the way ...

... **TPMs have been successfully hacked** by attackers with almost no resources (see refs).

SCPUs (IBM 4764)

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Active Tamper-proof Hardware.

Achieving WORM in the absence of active tamper-proof hardware is not possible.

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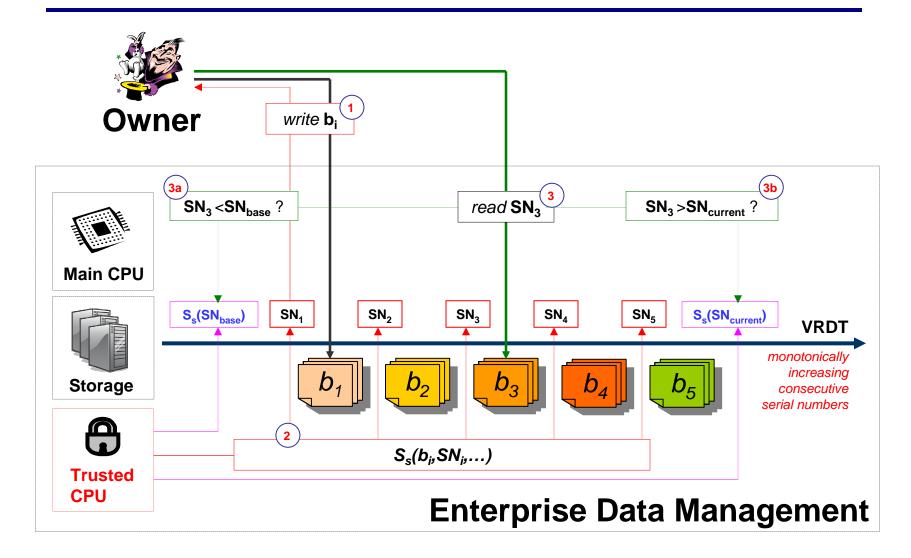


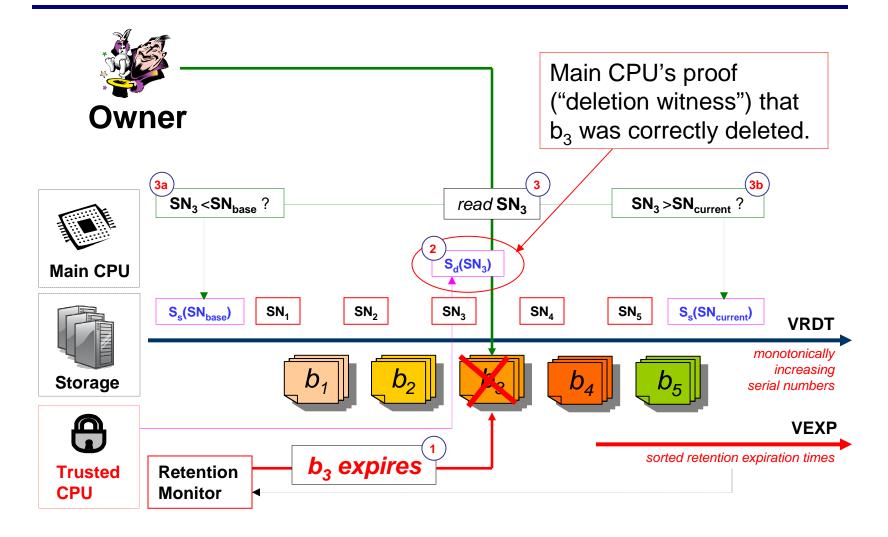
RSA1024 Sign: **848/sec** RSA1024 Verify: **1157/sec** 3DES: **1-8MB/sec** DES: **1-8MB/sec** SHA1: **1-21MB/sec**

IBM 4764-001: 266MHz PowerPC. 64KB battery-backed SRAM storage. Crypto hardware engines: AES256, DES, TDES, DSS, SHA-1, MD5, RSA. FIPS 140-2 Level 4 certified.

Some Intuition

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Issue

SCPU data digestion (hashing) is not very fast.

Fact

We already assume the stored data is accurate.

Question

Why not also trust the <u>main</u> CPU to produce correct data digests *at write time*? This should increase throughput.

How

To prevent cheating we double check during idle times (or mandatory if too much time passes).

Towards Regulatory Compliance in Data Management (VLDB 2007)

How do we maintain the VRDT efficiently.

Hierarchical. Arbitrary "deletion" windows.

How does the SCPU/RM enforce deletion efficiently.

Alarms, efficient index structures of retention expiration times.

How can we "witness" things fast: amortization.

In times of high-load: defer expensive witnessing and use short-lived constructs. During idle/low-load times: re-enforce short-lived constructs.

How fast can we go.

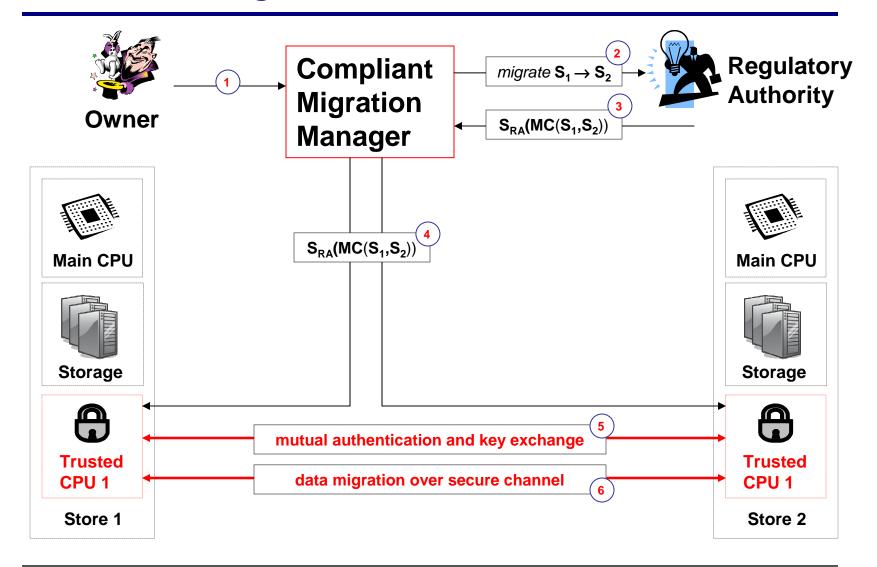
Writes: 3600-3700 updates/second (4-6hrs. bursts), 450-500 updates/sec (sustained). Reads: limited only by un-trusted system segment.

What about litigation support.

Authorized regulatory parties present credentials and are allowed to set/reset litigation holds.

What about migration ?

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Namespaces, Search Indexes

Trust-worthy Indexing

More Complex Migration

Complex query-driven migration

Secure Deletion

History Independent Data Structures, logging etc.

New Query Languages/Paradigms ?

Do transactional semantics still hold in the presence of regulatory compliance? Can we extend SQL to deal with e.g., WORM assurances ?

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Part 2: Indexing, Deleting, and Migrating Compliance Records

Marianne Winslett University of Illinois at Urbana-Champaign



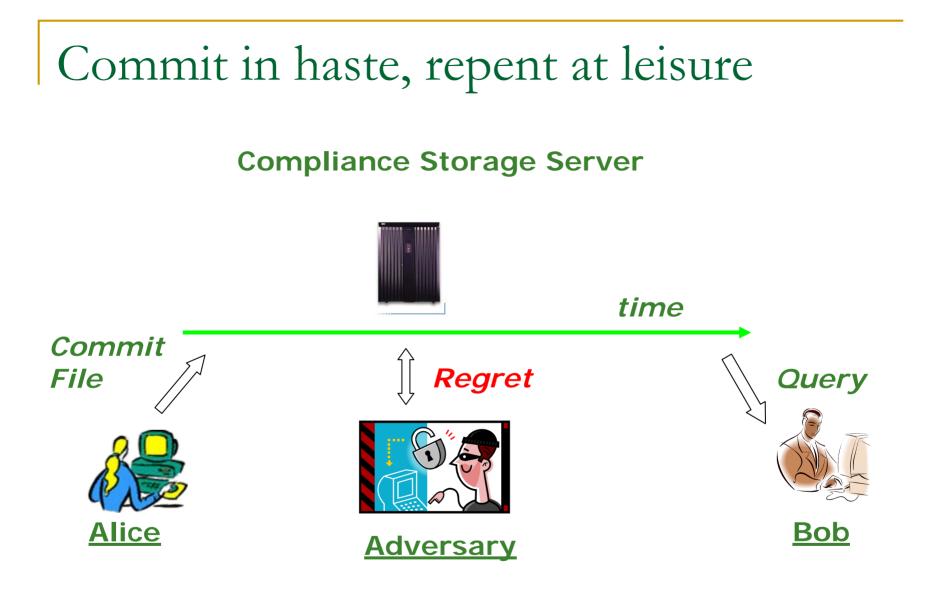
VLDB 2007: Tutorial on Regulatory Compliant Data Management

The compliance storage threat model & its implications

Threat model (didn't we hear this already?) Why traditional approaches to indexing and migration are not trustworthy



VLDB 2007: Tutorial on Regulatory Compliant Data Management







This leads to a unique threat model





Commit is trustworthy

File is created properly

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Adversary has superuser privileges

Can access any storage device, any keys

File is queried properly

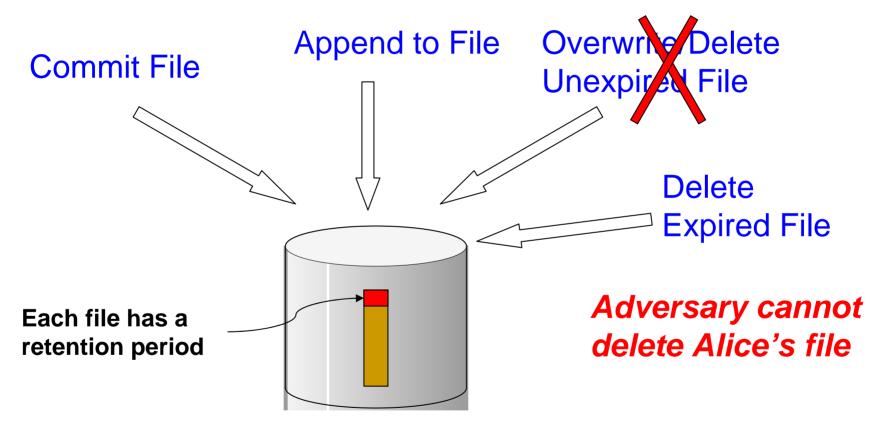
Query is

trustworthy

ARC 20 years of innovation

time

WORM storage helps address the problem

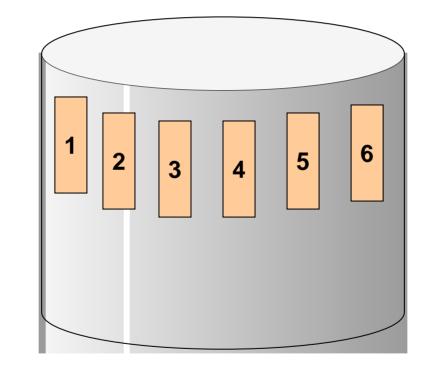


Write Once, Read Many





Data model: File = "record" = document/spreadsheet/email msg = unit of retrieval



Object-based compliance storage servers also exist



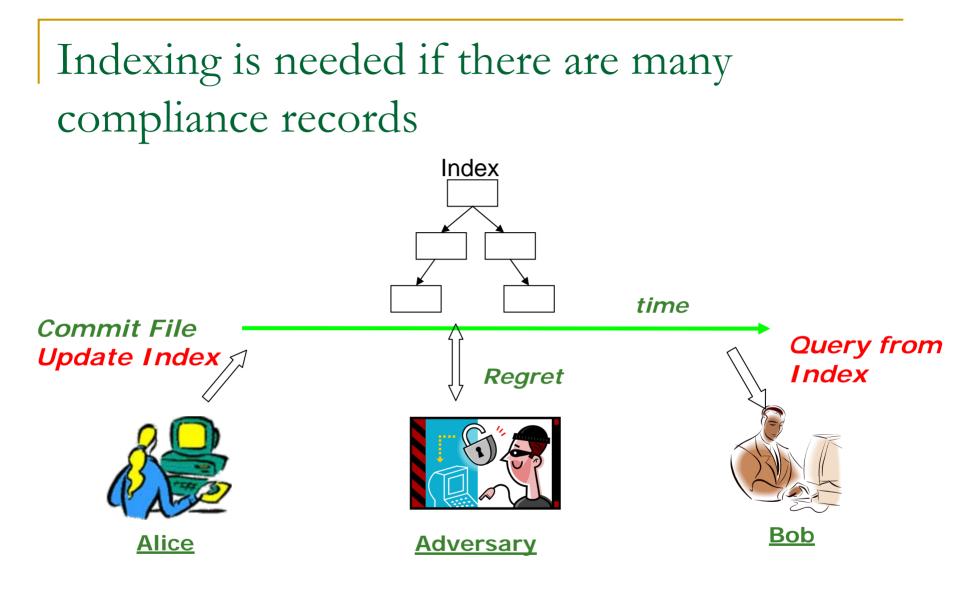
Record IDs

monotonically

increase

over time









In effect, records can be hidden/altered by modifying the index







Why don't we run the index code on the (trusted) storage server?







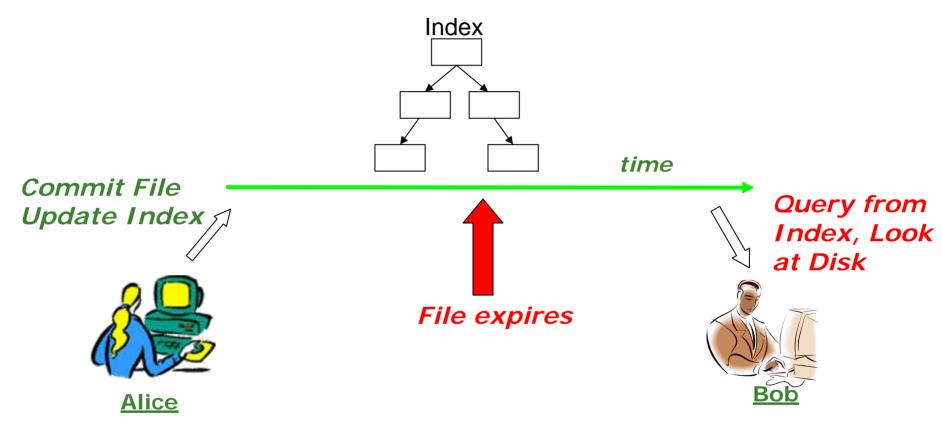
Why don't we run the index code on the (trusted) storage server?





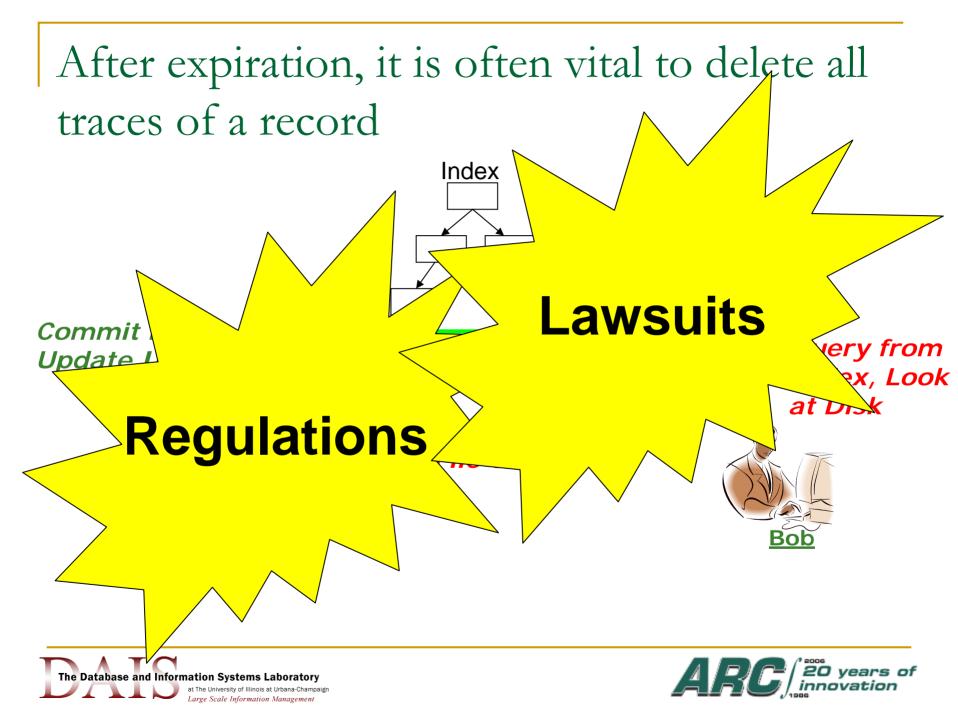


After expiration, it is often vital to delete all traces of a record

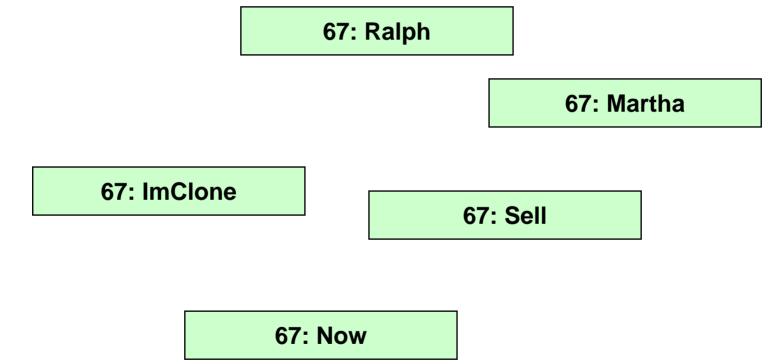








In effect, records can be kept visible by not removing them completely from the index







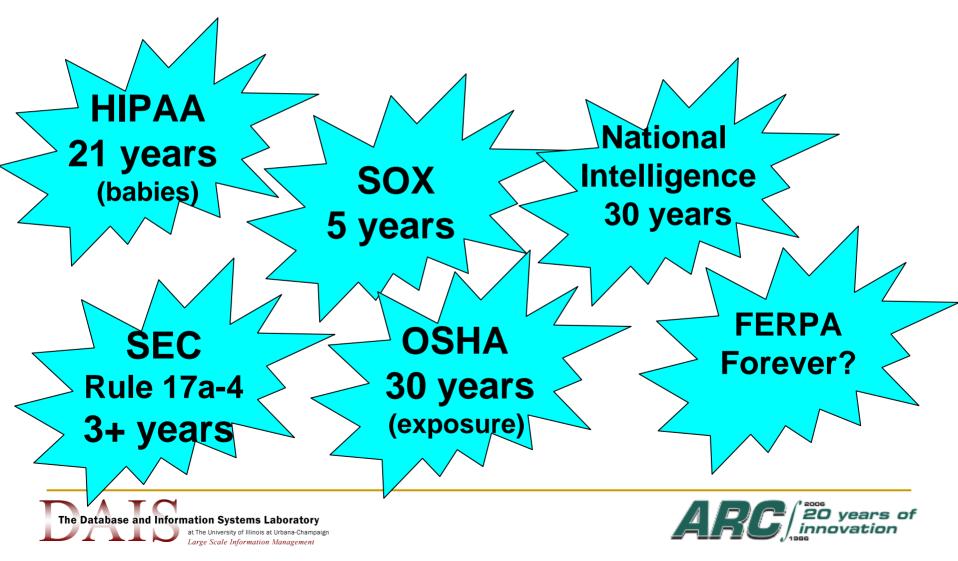
In effect, records can be kept visible by not removing them completely from the index

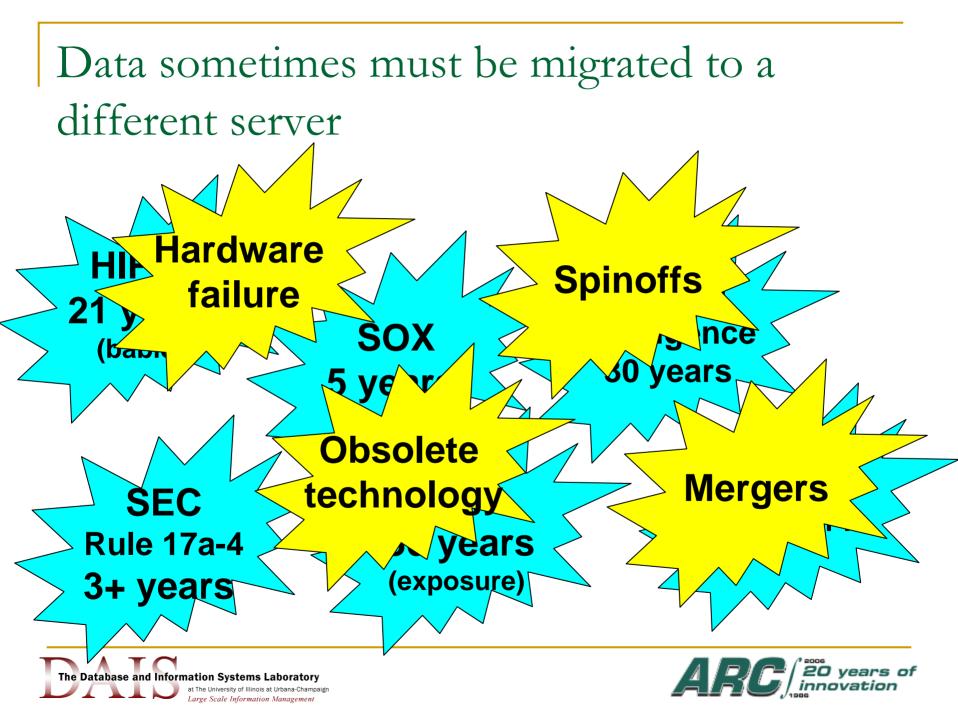




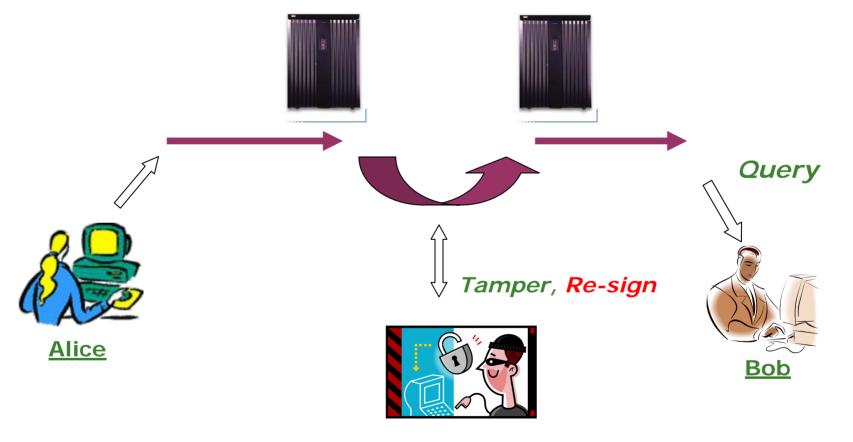


Data sometimes must be migrated to a different server





Alice's signature cannot protect a record during migration

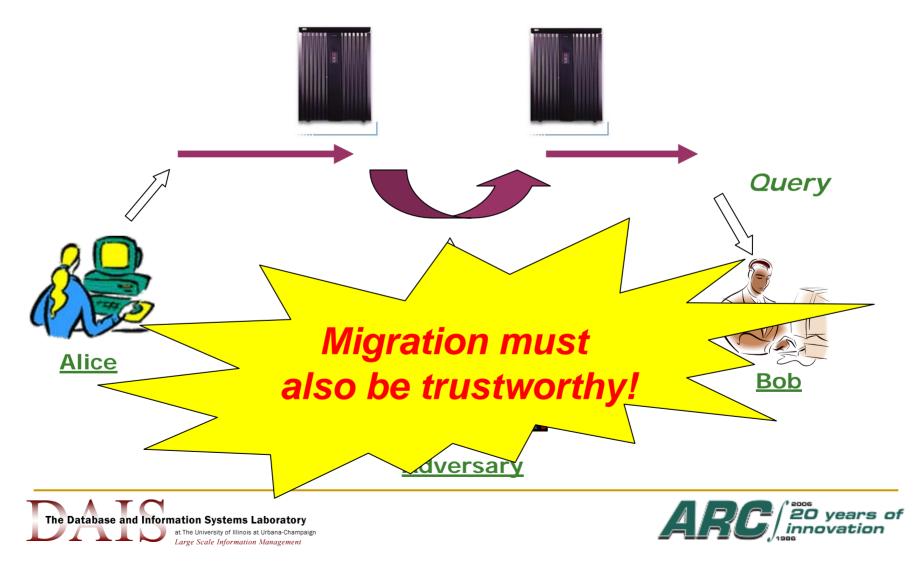


Adversary





Alice's signature cannot protect a record during migration



Conclusion: basic compliance data lifecycle needs trustworthy record retention, indexing, migration, and deletion.

Are traditional indexes trustworthy?



















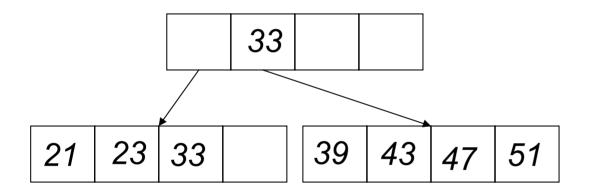








We can put a B-tree on WORM, either bottom-up (easy) or with node splitting [Rathmann, ICDE 84; Easton, IBM J. 86]

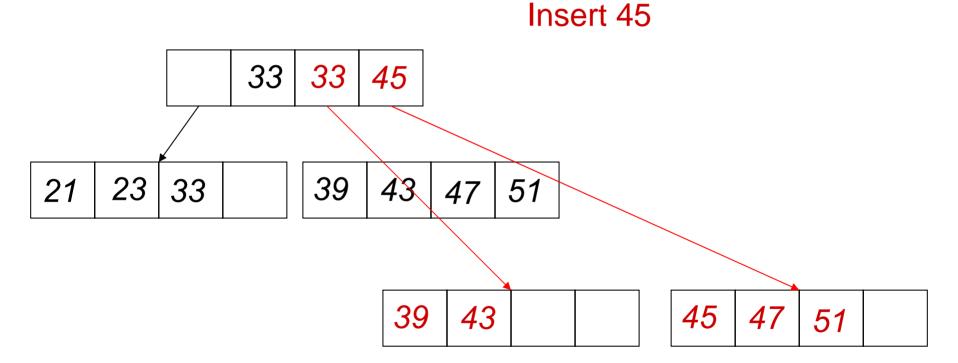


One B-tree node per (appendable) file





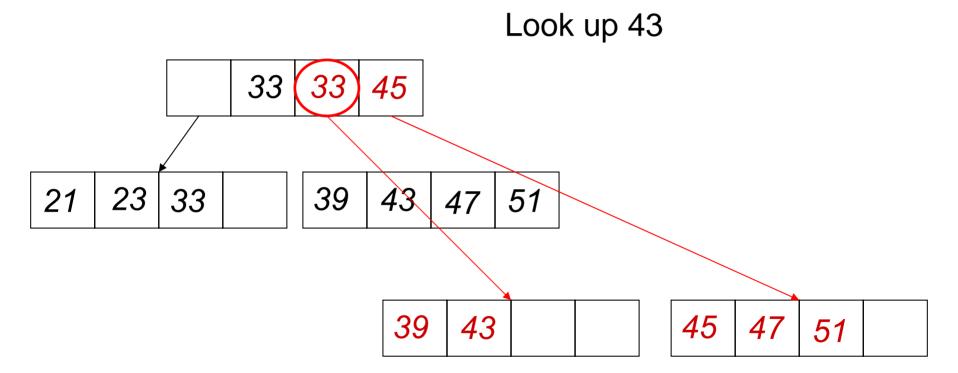
Copy a node to split it; append corrected entries to its parent







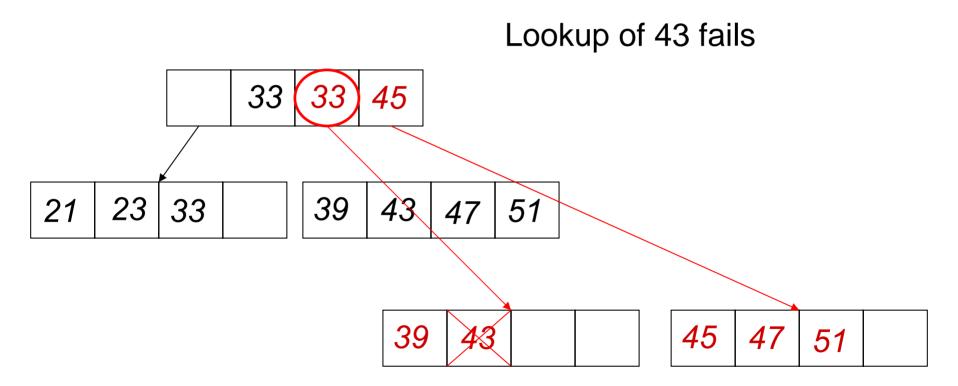
Lookup follows the newest node







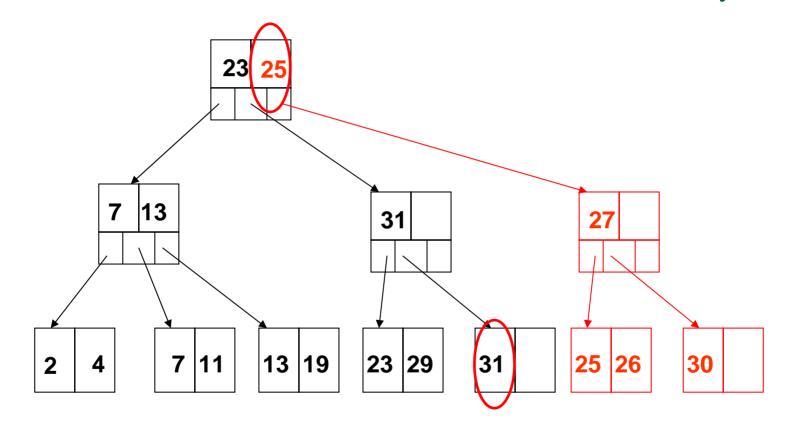
B-trees are not trustworthy on WORM: the adversary can omit values during copying







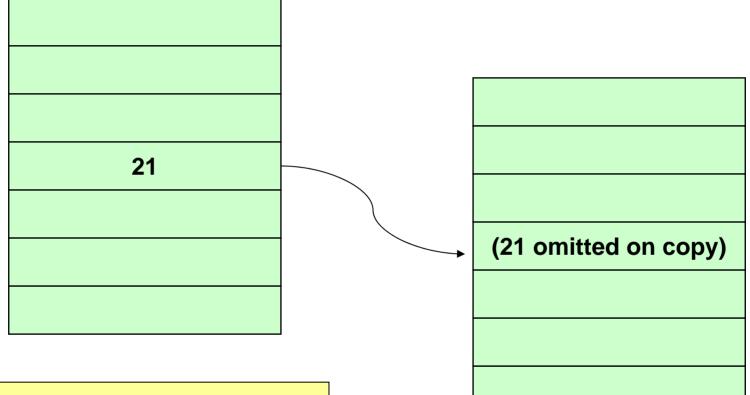
Even built bottom-up without node splits, B-trees on WORM are not trustworthy







Linear/extensible/dynamic hashing is bad on WORM, and copying is not trustworthy

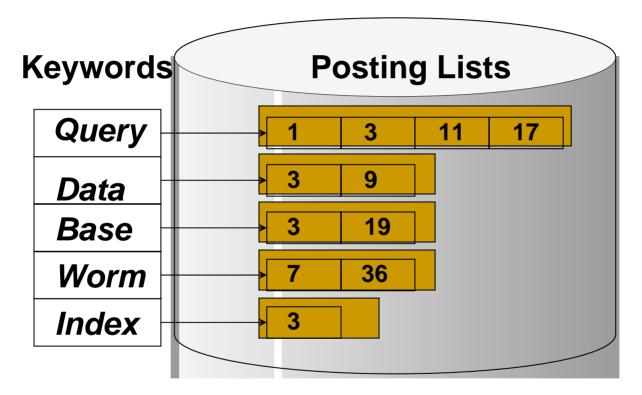


Each slot is a file??





Unstructured/semistructured data need inverted indexes

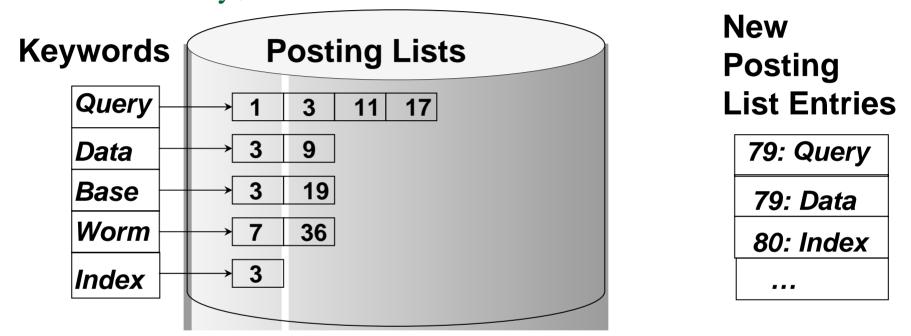


One WORM file for each posting list





Traditional inverted indexes are not trustworthy, even on WORM



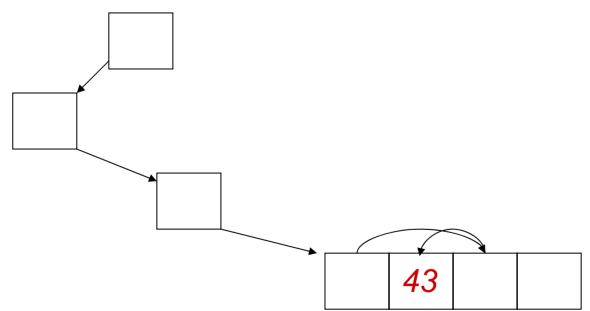
Delta file of updates + periodic sort-and-merge = opportunity for adversary





Conclusion: *No* traditional index is trustworthy

The search path to an item cannot depend on what is inserted later.







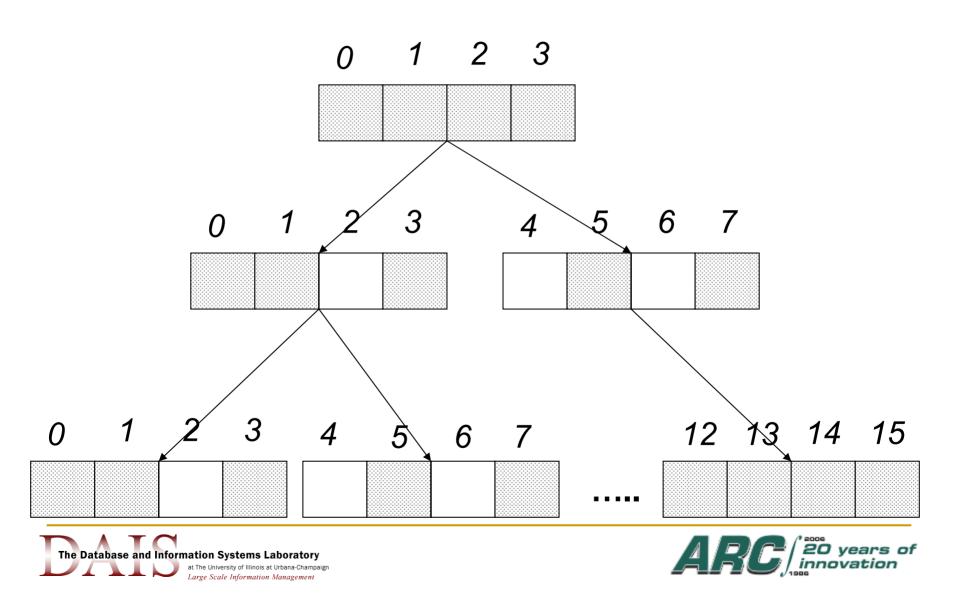
Trustworthy Indexing: Generalized Hash Trees Trustworthy Inverted Indexes Jump Indexes

> [Zhu & Hsu, SIGMOD 05] [Mitra, Hsu, & Winslett, VLDB 06 / VLDBJ 07]

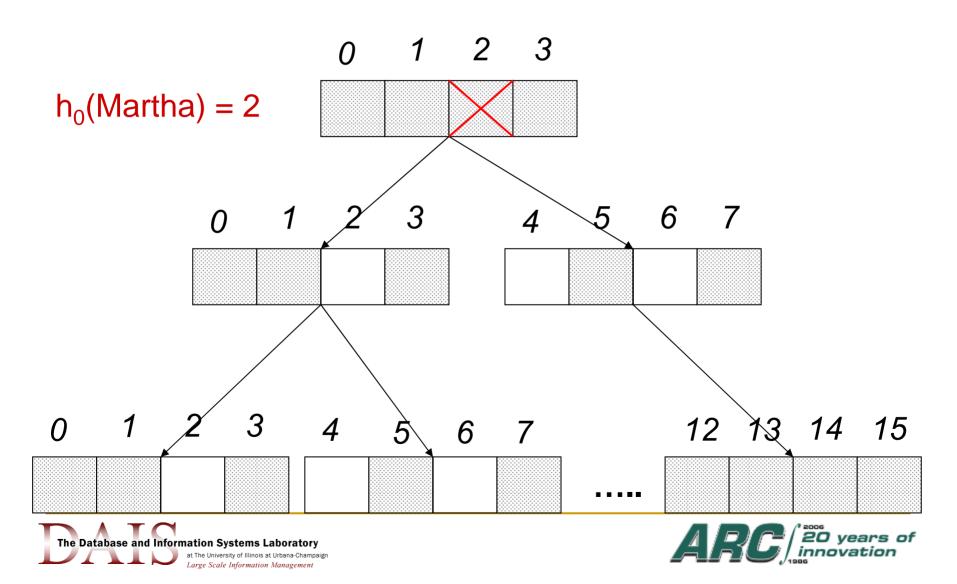


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Generalized Hash Trees are trustworthy



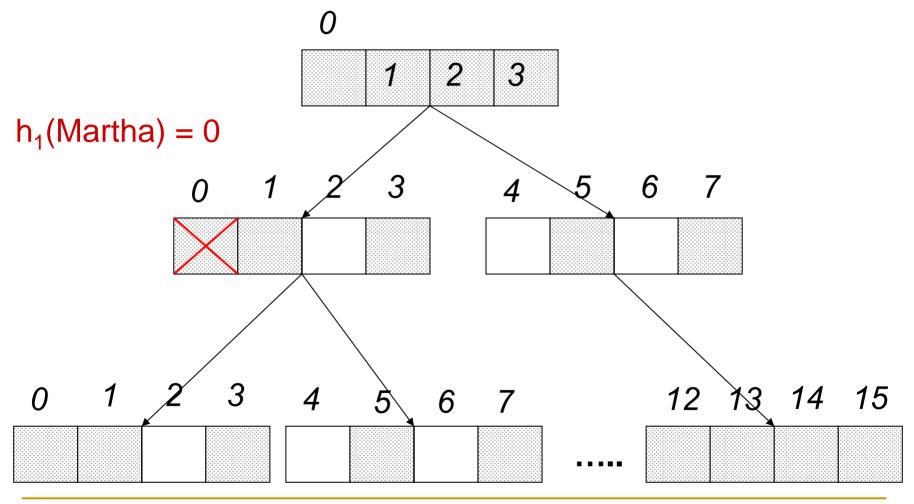
On collision, go to next level



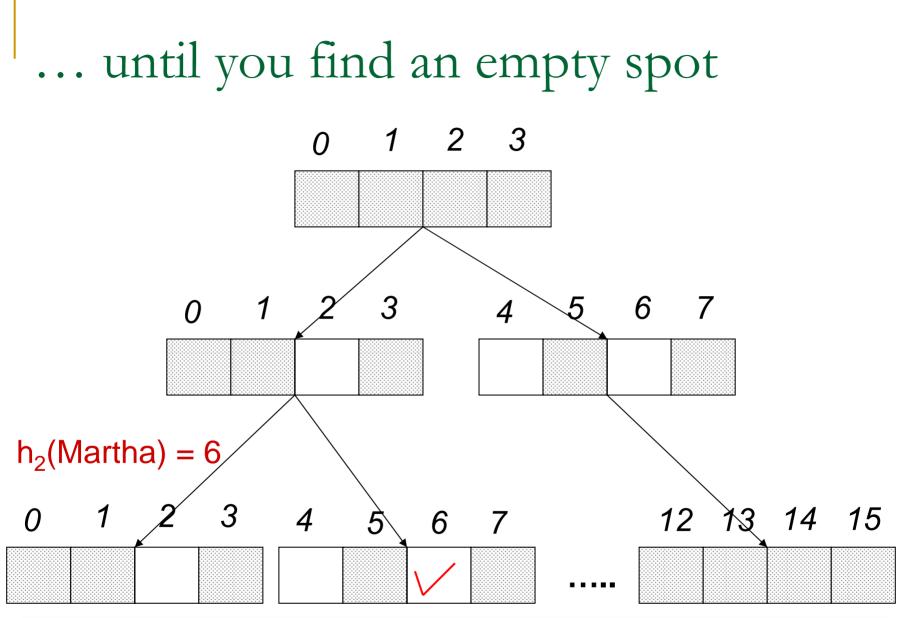
Rehash at the next level down ...

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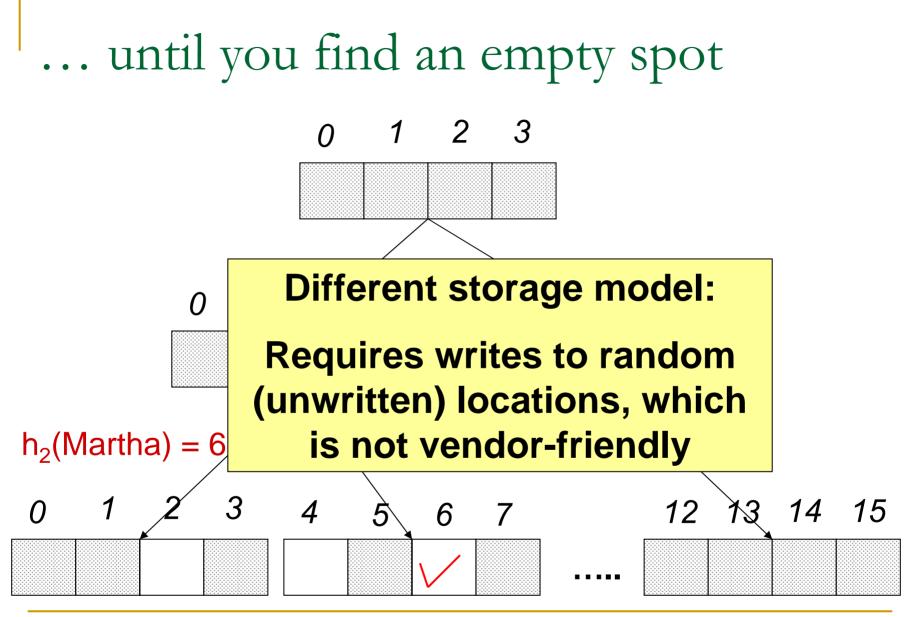










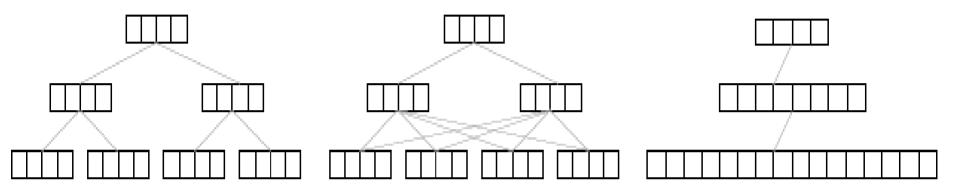


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GHTs can have many different shapes

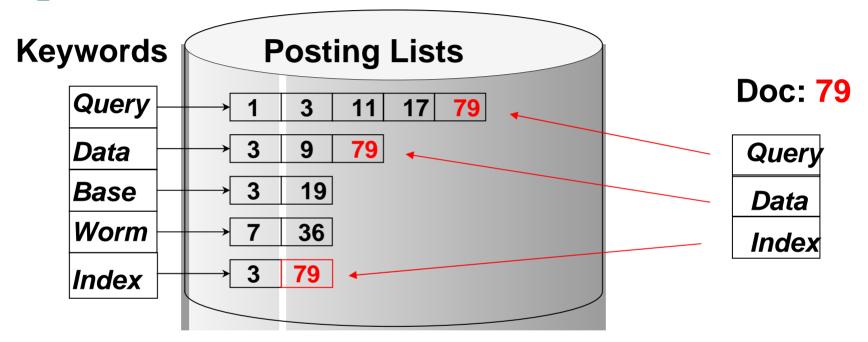


All have O(log n) performance if "good" hash functions are used Expected size is O(n) to O(n^3), depending on shape Provably trustworthy





A trustworthy inverted index must be updated as new documents arrive



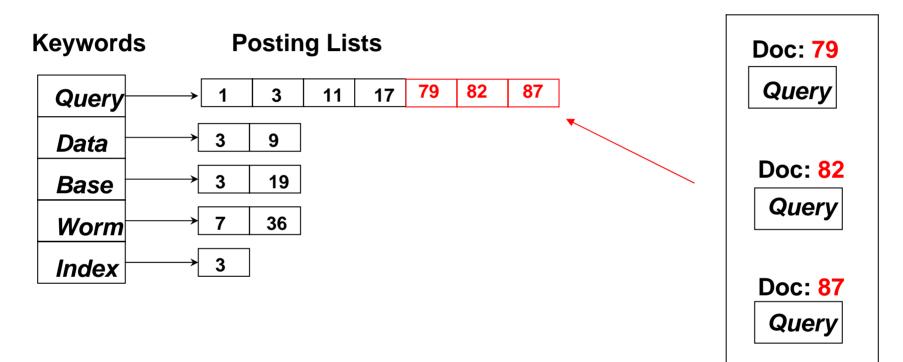
500 keywords = 500 disk seeks ~1 sec per document is too slow!





Amortize the cost by batching updates

Buffer



1 seek per keyword in batch





Buffering opens opportunity for attack when entries are copied to posting lists

Need > 100,000 buffered documents for update rate of 2 documents/second

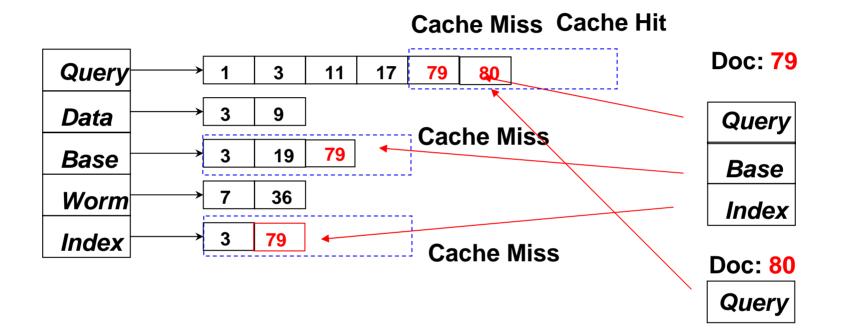
Average document indexed after ½ day

Window of vulnerability is too large!





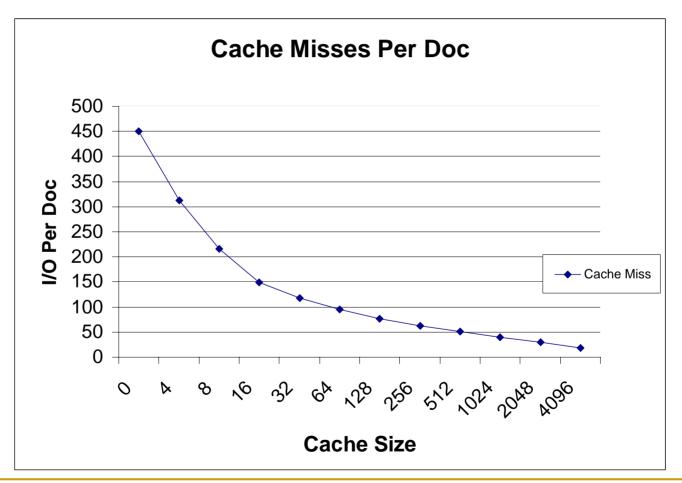
Storage server cache is trustworthy







\$imulations show caching is not very beneficial







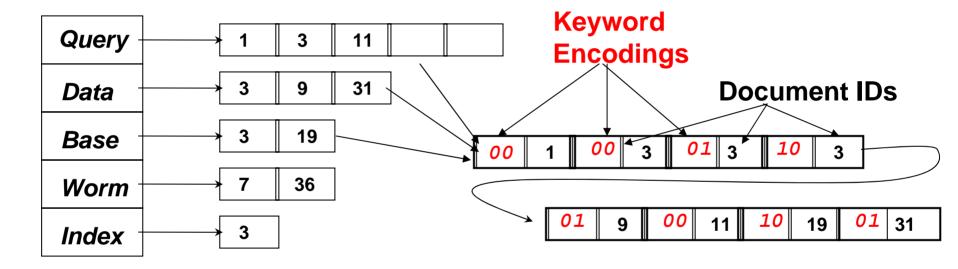
Simulations show ching j t very beneficial **Problem: most documents** contain infrequent terms that cause cache misses he Miss 6 12° 25° 512,02° 204° ~6 ઝેપ

Cache Size





So, merge posting lists until every update hits the cache



1 random I/O per new document on average, with IBM intranet workload!





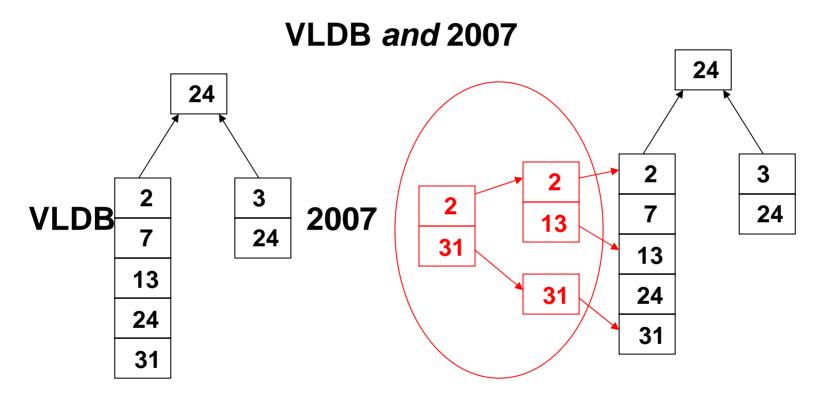
Cost of merging: longer lists to scan during lookup

- ~10% performance hit with uniform random merging, 128 MB server cache, real-world data/queries
 - Only a few popular query terms
 - They have long posting lists and rarely get merged with each other
- "Smarter" merging schemes can do better if needed





We really could use trustworthy B-trees



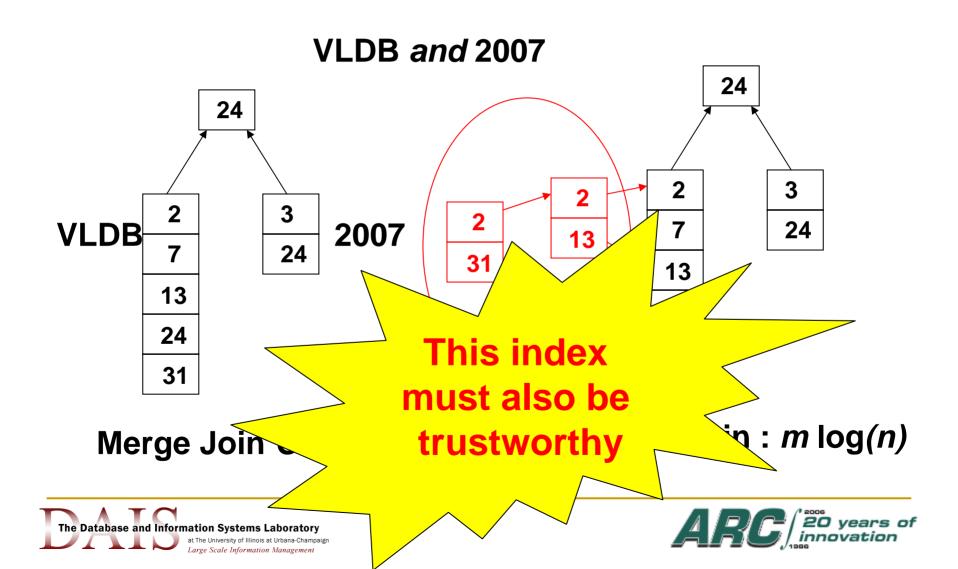
Merge Join O (m+n)

Index Join : *m* log(*n*)





We really could use trustworthy B-trees

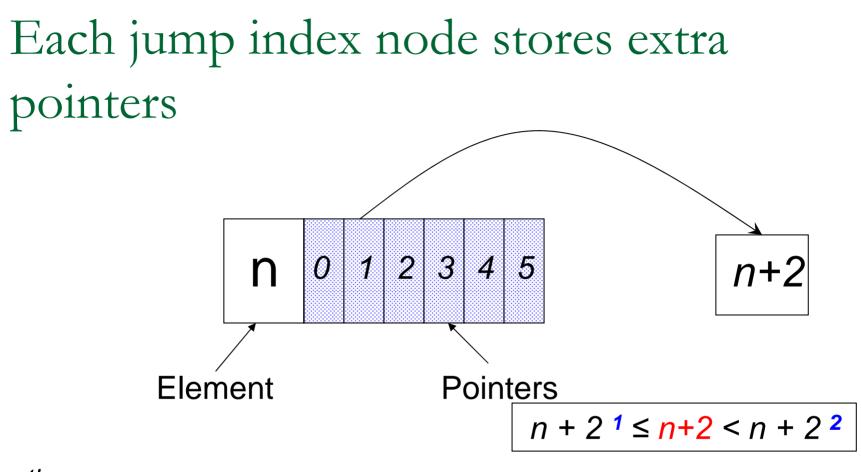


Jump indexes are a trustworthy version of B-trees for monotone sequences

- Doc IDs, arrival times, …
- O(log N) lookup, where N is the item being looked up
- Provably trustworthy
- 40% slower than *unmerged* posting lists and B+ trees, on a conjunctive search workload with real-world data, 256 MB server cache
- Avg 2 I/Os/doc insertion with intranet data, 256 MB server cache





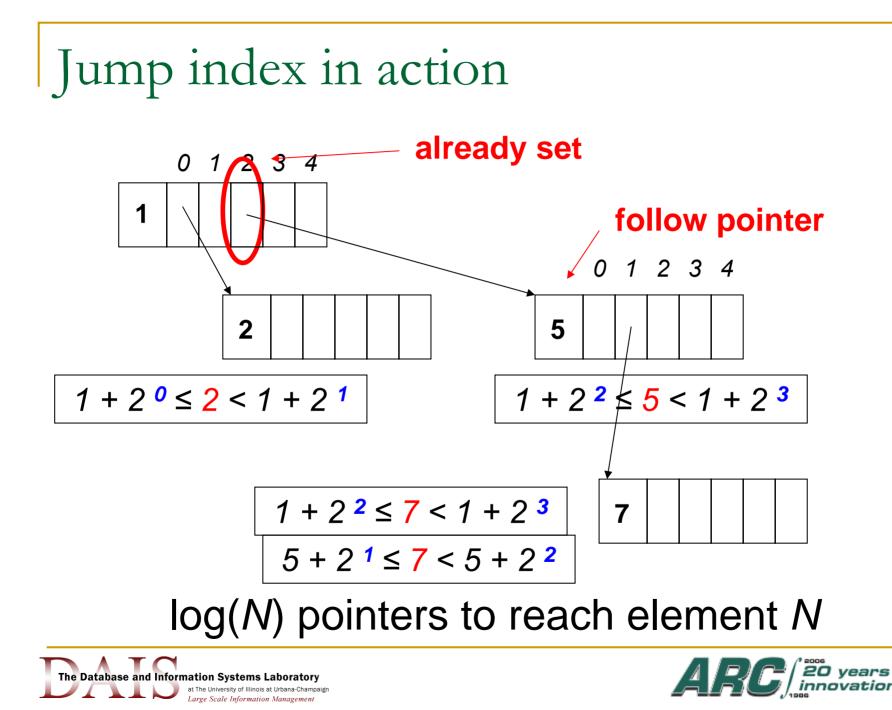


 i^{th} pointer points to an element n_i

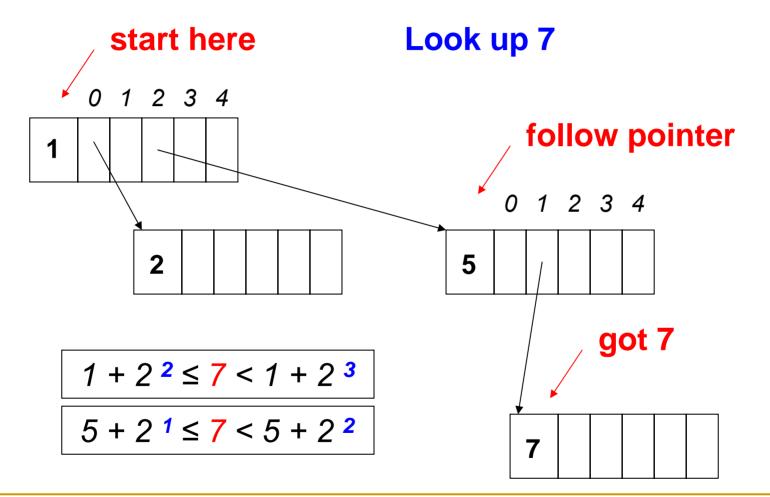
$$n + 2^{i} \leq n_{i} < n + 2^{i+2}$$







The path to an element does not depend on future insertions



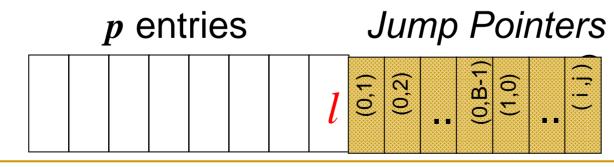




Jump index elements can be stored in blocks, for greater efficiency

Group *p* entries together with branching factor *B* Pointer (*i*, *j*) from block *b* points to block *b*' having smallest *x* such that

$$l + j B^{i} \leq x < l + (j+1) B^{i}$$



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Indexing conclusions

- Traditional indexes aren't trustworthy
- We can build trustworthy generalized hash trees, inverted indexes and jump indexes for compliance records
- All are reasonably fast





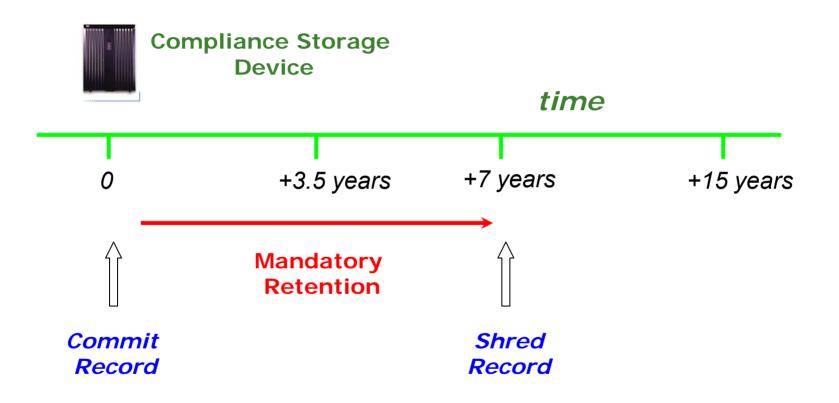
Trustworthy deletion from indexes

[Zhu & Hsu, SIGMOD 05] [Mitra, Hsu, & Winslett, SSS 06 and new work]



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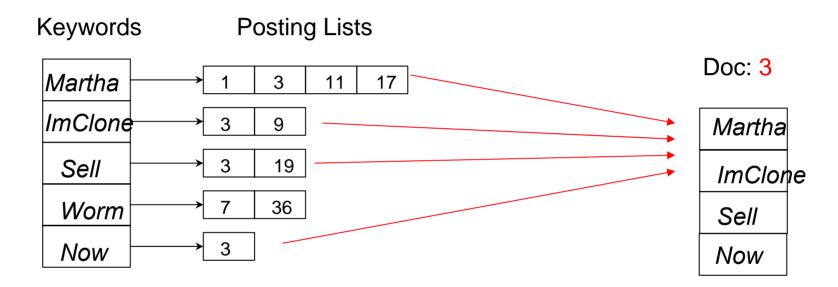
Expired documents usually must be deleted





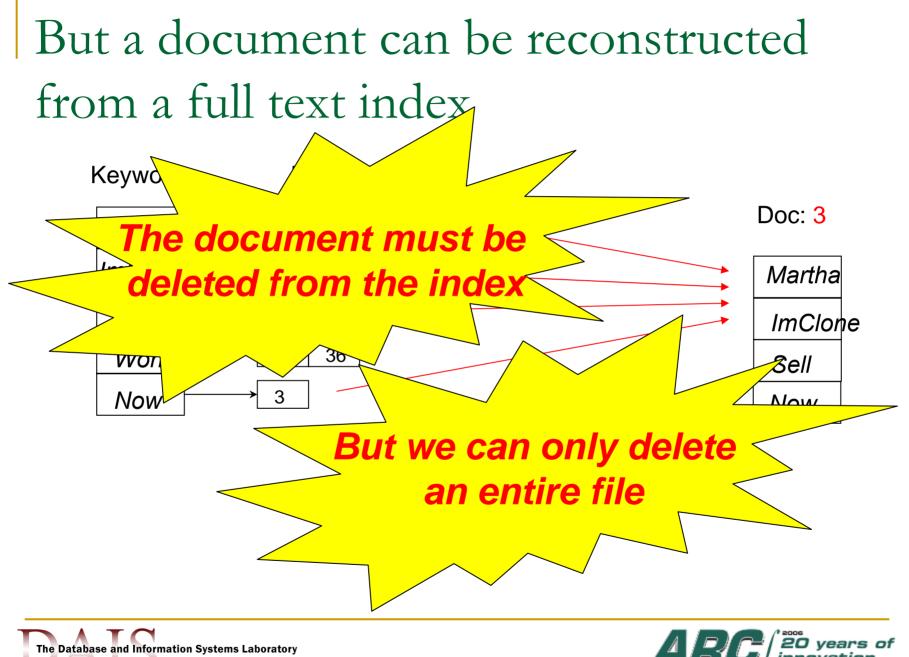


But a document can be reconstructed from a full text index





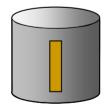




at The University of Illinois at Urbana-Champaigr Large Scale Information Management We can formally define secure deletion through an indistinguishability game



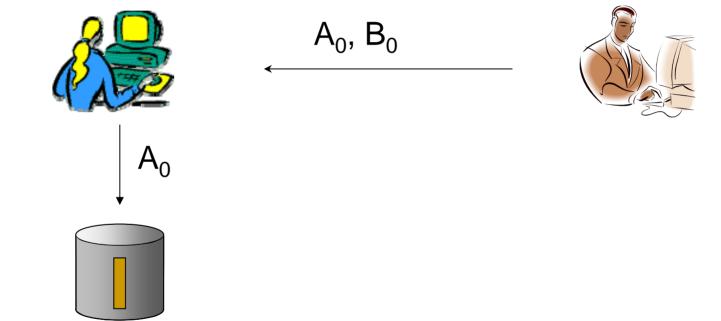








Hidden from Bob, Alice randomly chooses one document set & stores & indexes it.





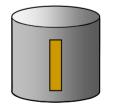


And the game continues



A₁, B₁



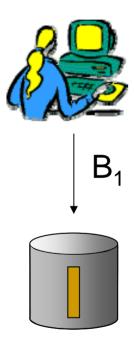








And the game continues



 A_0

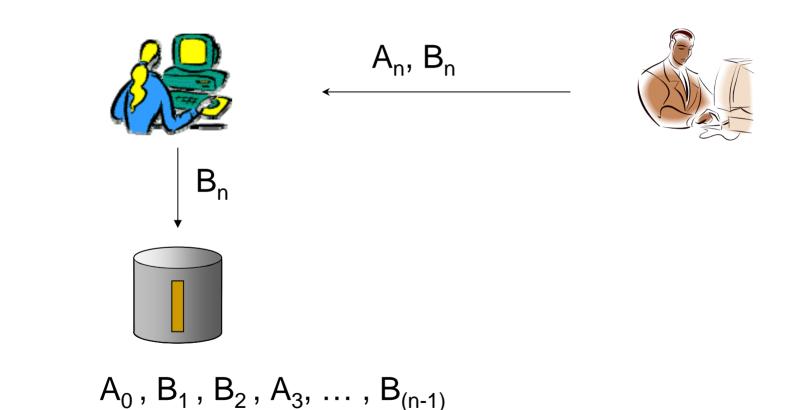
A₁, B₁







And the game continues



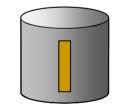




Alice erases the documents and index entries as documents expire





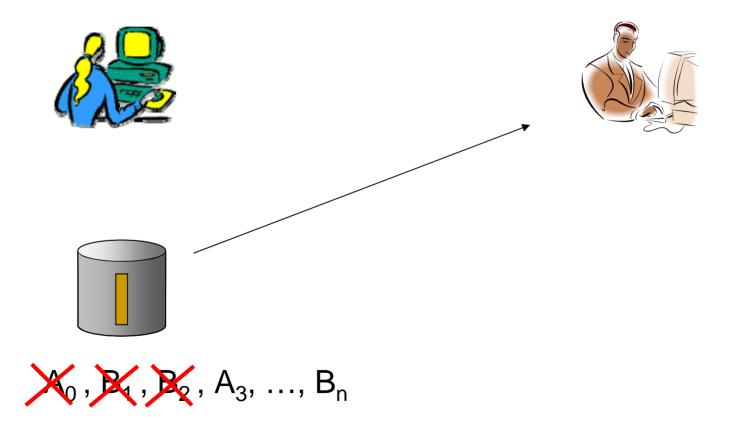


X₀, X, X, A3, ..., B_n





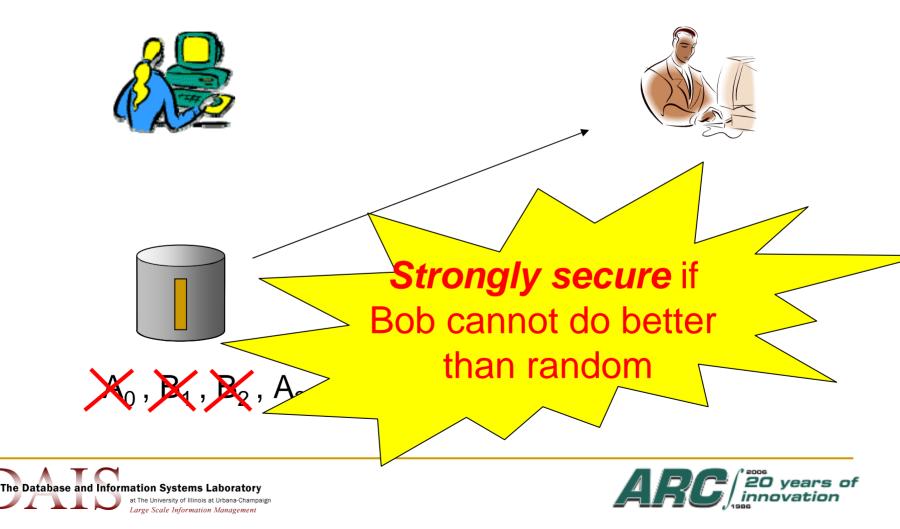
Bob wins the game if he can guess the deleted document sets



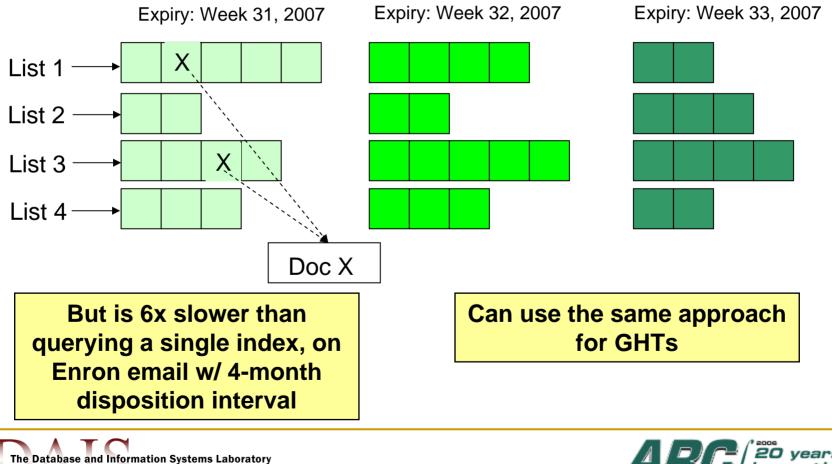




Bob wins the game if he can guess the deleted document sets

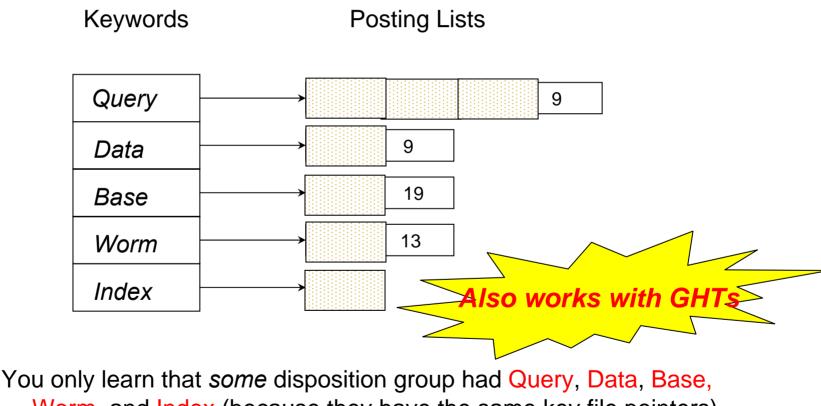


Separate index for each disposition group: strongly secure, but slow queries



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Logical disposition: Encrypt the document IDs of a disposition group, discard key Delete 1, 3, 5, and 7



Worm, and Index (because they have the same key file pointers)





Logical disposition isn't strongly secure

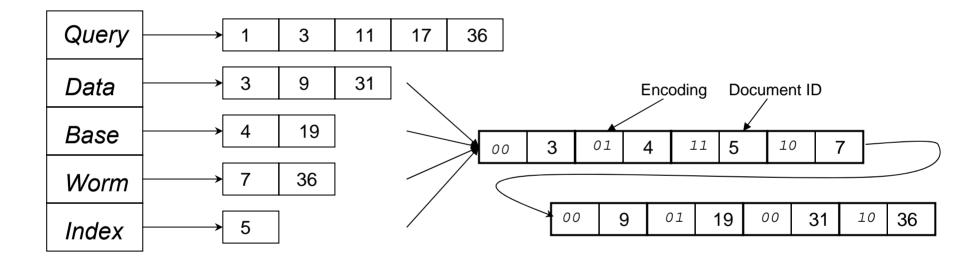
- Presence of Martha, ImClone and Ralph is suspicious
- Absence of ImClone can also be suspicious

Adversary can still
> reverse engineer terms
from posting list lengths





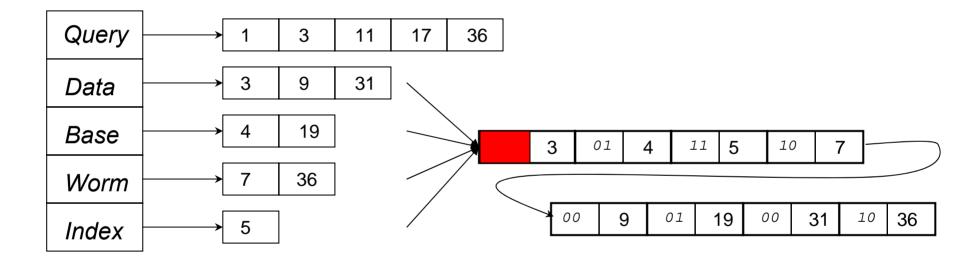
Recall that trustworthy inverted indexes have merged posting lists







A term occurrence can be partially hidden by "deleting" its encoding (encrypt it, discard key)



Document *3* had one of the words Query, Ascertain, McDonald, 55, ...





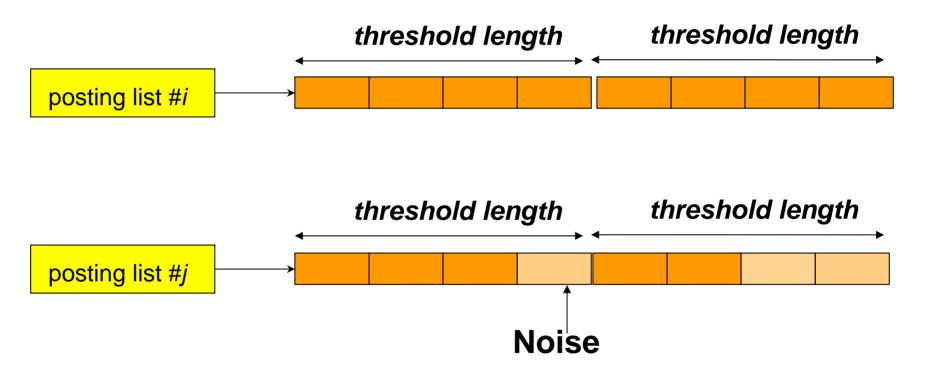
Uniform posting list lengths for each disposition group + merged posting lists + encrypted posting elements = provably strongly secure deletion with reasonable performance







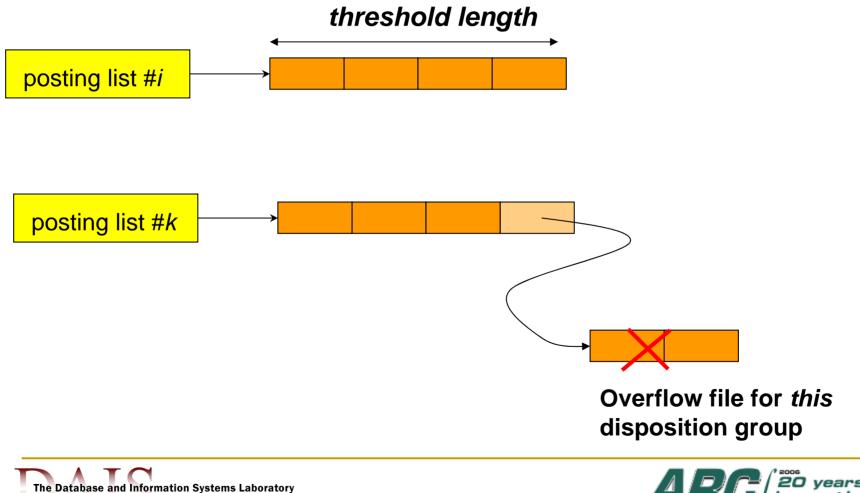
Add noise terms if actual length is less than threshold







Additional elements for a disposition group are stored in an overflow file



at The University of Illinois at Urbana-Champaign Large Scale Information Management ARC 20 years of innovation Index performance depends on the choice of threshold lengths

- Too short → lots of overflows → poor query performance
- Formulate as a dynamic programming optimization problem

Results on Enron email: queries are 5-6 times faster than with an index for each disposition group





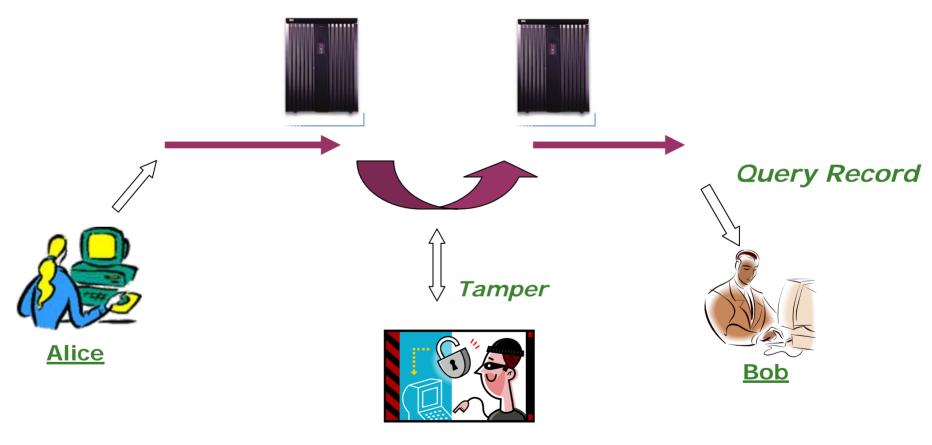
Trustworthy Migration

[Mitra, Winslett, Hsu, and Ma, MSST 07] [Sion, tech report 07]



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Data sometimes must be copied to a new server



Adversary





Bob must be able to verify that the records have not been tampered with during migration

Tamper-evident is good enough

Detection of tampering leads to automatic presumption of guilt





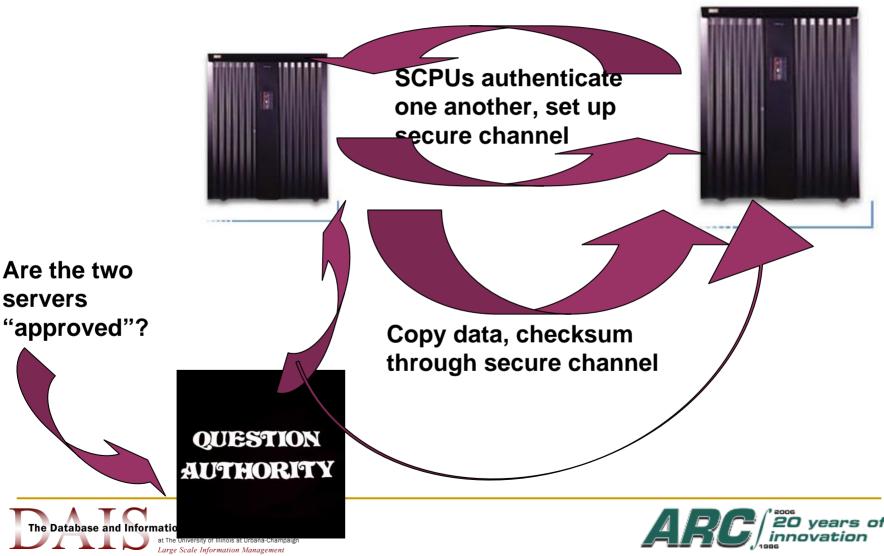
The bottom line on migration

- Trustworthy migration can be supported by enhancing the storage server with signing capability (via a secure co-processor)
- The concepts can be generalized to an arbitrary sequence of migrations, including directory restructuring and omission
- Policy-driven migration, where certain files are omitted, is hard if we don't want to leak info about omitted files

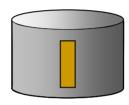


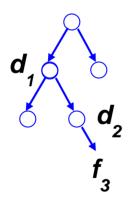


If we are using SCPUs, must ensure that new server has one



Bob is looking for a particular file created on server A Server A





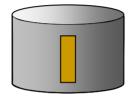
Bob obtained the path $d_1 / d_2 / f_3$ from a trustworthy index

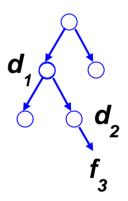




Bob only has access to the files on server B

Server **B**





Bob is looking for file $d/d_2/f_3$

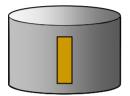


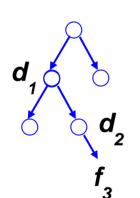


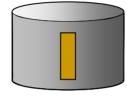
Bob has to verify that the file was migrated correctly

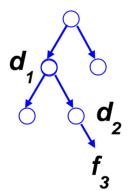
Server A

Server B





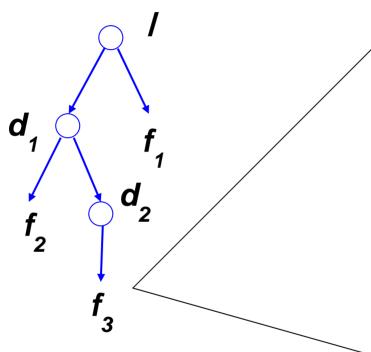








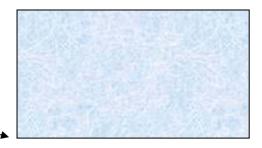
Both the data and metadata must be preserved



Meta-data

*	owner	Alice
	Create-date	01/01/1996
	expiry-date	01/01/2016
	Size	1236

Contents

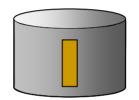






The storage server can be enhanced to issue certificates for files, with a secure

coprocessor Server A



d

The certificate is a proof of file's contents and metadata

Certificate

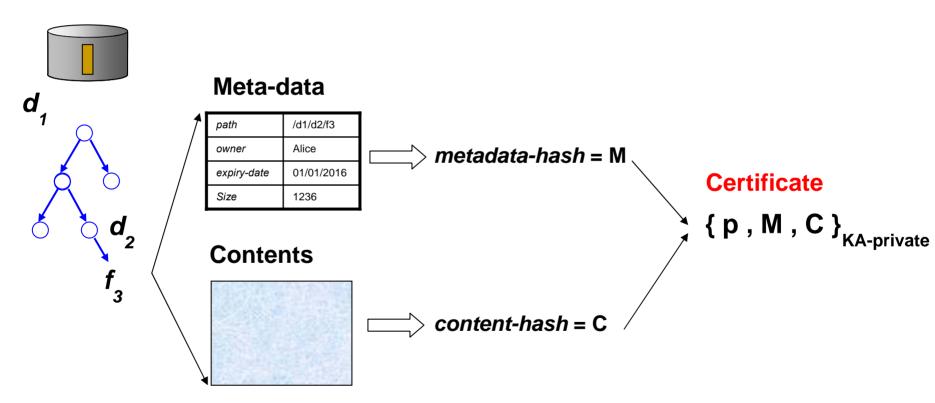


d



The certificate includes the metadata and content hashes

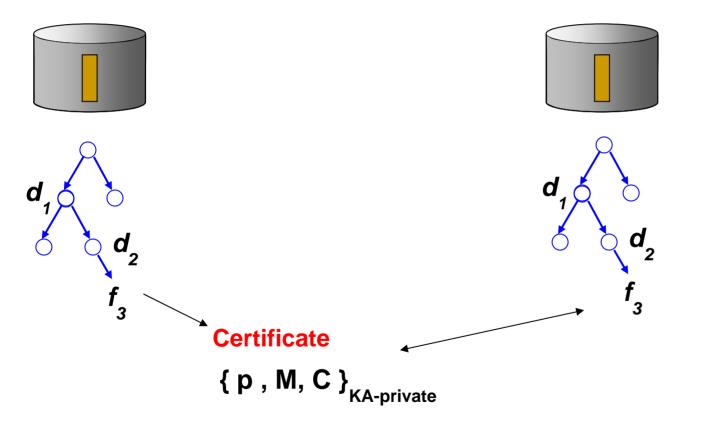
Server A







The certificate can be generated fairly quickly, used to verify integrity Server A Server B







Migration is solved!! (not really)

- Directory restructuring
- Policy-driven file omission
 - Omit files owned by user Alice
 - Omit files containing specific keywords



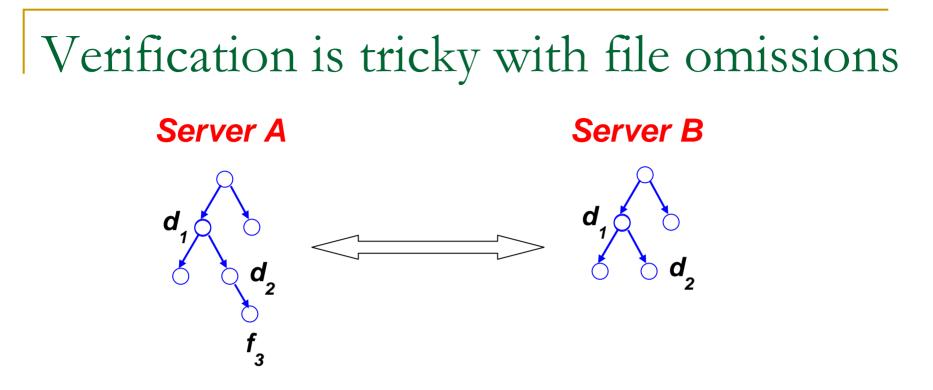


Keep a (signed) log of the directory restructuring operations

- Given a file path on Server A, Bob can use the migration log to determine its path on Server B
- Bob can verify the file contents against the certificate signed by Server A







Bob is looking for file /d1/ d2/ f3 --- should not get the file

Bob should be able to verify that migration policy is satisfied

He should not learn any data/metadata (ex owner) about f_{3}





Migration with omission is a 2-step process Server A Server B $d_1 \\ d_2 \\ d_2 \\ f_3$

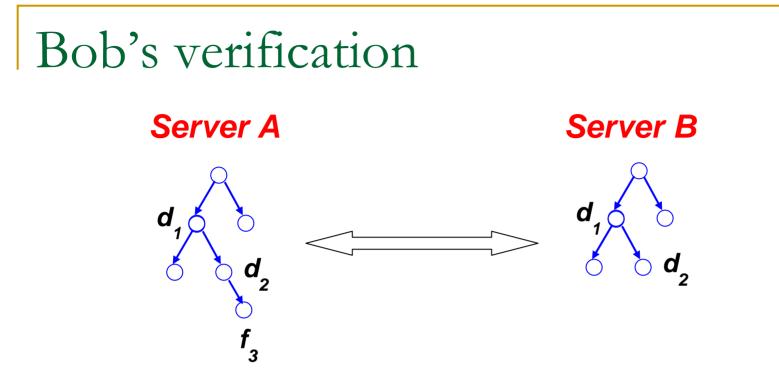
Migrator records DEL $(\frac{d}{d_2} f_3)$ in the migration log

Generates and copies its metadata certificate

Only the owner field is included in the certificate







Bob finds DEL $(\frac{d}{d_1}, \frac{d}{d_2}, \frac{f_3}{d_3})$ in the migration log

Verifies that owner was indeed Alice using the certificate





The previous approach leaks information

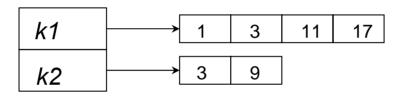
- Bob gets to know that there was a file under /d1/d2/f3
 - Bob is able to prove that a file with that name was present
- Ideally he should not be able to distinguish between these cases:
 - /d1/d2/f3 was not present
 - /d1/d2/f3 was present and was legitimately omitted





Policies can be more complex: migrate documents with terms *k1* and *k2*

Exploit the inverted index

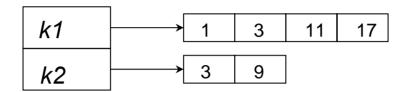


- Migrate the keyword posting lists
- Bob can obtain the list of documents having k1 and k2





The posting lists leak information



- Bob gets to know the documents that have either k1 or k2
- Ideally he should only learn about documents which have both k1 and k2
- AND queries can be handled using crypto-tricks





Take-home messages

- Compliance storage research is all about insider threats
- A secure coprocessor in the storage server buys a lot in terms of trustworthiness, but must be used very sparingly
- Traditional indexes are not trustworthy
- Trustworthy indexes are complex but usually quite fast





Everything not mentioned in this tutorial is an open research problem

- Other kinds of trustworthy indexes
- Strongly secure deletion from GHTs, jump indexes
- (Many aspects of) litigation holds
- Index migration
- Removing info about expired files from migration logs
- Trustworthy databases and other high-level functionality
- Trustworthy indexing for object-based compliance storage servers



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Thank you!





