**3GPP TSG-SA3 Meeting #103-e *draft\_S3-212123-r2***

e-meeting, 17 - 28 May 2021

**Title: LS on User consent**

**Response to:**

**Release: Rel-17**

**Work Item: UC3S**

**Source: SA3**

**To: SA2**

**Cc:**

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**Attachments:**

# 1 Overall description

SA3 would like to inform SA2 on the work status of user consent study in TR 33.867 regarding user consent and revocation.

In the context of eNA, data is processed for specific purposes and provided to external applications. Thus, a solution for user consent is important to have in Rel-17 along with the normative eNA feature currently progressed by SA2. SA3 has so far identified key issue #2 on “User consent for UE data collection” and key issue #3 "Modification or revocation of user consent" in TR 33.867, for which solutions are needed.

SA3 would like to provide the following comments on SA2 conclusions in KI#15 User consent for UE data collection/analysis.

A general comment is that all mechanisms for consent should be specified as "may". Since requirements vary across regulations, "shall" shall not be used.

Also note that the collection and revocation of consent are being discussed in SA3. SA3 will define necessary mechanisms and/or requirements and will inform SA2.

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| **23.700-91 conclusions on KI#15 User consent for UE data collection/analysis** | | **SA3 comments** |
| a) | UDR (via UDM services) holds the user consent for user related data which is provisioned by MNO as a user subscription information. | Nokia: since already user consent is provided by UDR via UDM in MDT case, it is useful to have a similar mechanisms for other use cases, thus, it is recommended that for UE data collection and analytics, the UDR (via UDM services) holds the user consent  Huawei: we are fine that UDR (via UDM services) holds the user consent. However, the services should be extensible so that the services can cover other user consent scenario, e.g. MEC.  Ericsson: Okay. UDM/UDR manages already user consent for other services as subscription data and it should be OK to manage consent for other services/UCs, preferably in a generic way.  Mind though that considering user consent “as a user subscription information (in UDM)” implies making use of the existing services for Subscription Data Management, i.e., Nudm\_SDM. This includes the possibility for an NF consumer to Get user consent data and Subscribe to get Notifications of changes of user consent data from UDM.  In other words, the Nudm\_SDM service does not support any tracking functionality as discussed in bullet e). The requirements for such tracking functionality will determine the service and the NF exposing such service. |
| b) | A service provider (external to MNO domain) may use NEF parameterProvision\_Update service to update or to revoke the user consent to the UDM/ UDR (when applicable). | Nokia: allowing an external entity to update or revoke user consent in UDM/UDR may result in new security risks and is therefore not recommended  Huawei: this is much relying on difference service security requirements, and should be extensible for kinds of services. This is one possible way to update and modify user consent. Since there is some existing mechanism for AF authentication and authorization, we don't see any new security risk.  Ericsson: Not okay for now. Needs to be further studied. The issue is whether we are allowing a company quite far down on the supply chain to be able to dictate the actions for those higher up, in essence changing the position of the controller/processor relationship. Issues could arise from an improper data subject check or demanding data deletion based on consent when a different legal basis has been used. |
| c) | Alternatively, the user consent parameter may be configured by MNO in the UDM/UDR (when applicable). | Nokia: It is useful to allow an operator to configure user consent parameters in the UDM/UDR.  Huawei: agree with Nokia.  Ericsson: Okay. |
| d) | Another option is the ASP configures the ASP's Application in UE to provide input data only if user consent is obtained. | Nokia: Configuration by application service providers is out of scope in 3GPP.  Huawei: out of 3GPP scope, but can be an alternative.  Ericsson: Okay. |
| e) | A functionality to be provided to support tracking the distribution and usage of any user related information that may be subject to user consent.  NOTE 1: Whether the functionality described in bullet item e) is hosted by NWDAF, DCCF (and possible interactions with DRF) or as a standalone NF is decided in normative phase in alignment with SA WG3 feedback. | Nokia: It is proposed to host this service in UDM/UDR, as already user consent information is stored there, and thus different user consent for different use cases would be all in one place.  A new standalone NF seems to be not necessary for tracking the distribution and usage of user related information, when UDM already holds subscriber data and subscription details.  Huawei: We need more time to investigate details. But in general, we are fine to introduce a functionality to support tracking NFs who are using data subject to user consent.  Ericsson: Not okay for now. Needs to be further studied. SA3 first needs to define requirements on tracking. Then how to achieve that (with UDM or new NF) can be left to SA2. So, SA3 should indicate that requirements are not yet defined by SA3 and will come back later. |
| f) | The functionality described in bullet item e) subscribes to the UDM/UDR to receive notifications for any changes in the user consent. | Nokia: this is not needed, if hosted by UDM/UDR.  Huawei: Huawei: We need more time to investigate this issue. But in general, we are fine to introduce a functionality to support tracking NFs who are using data subject to user consent.  Ericsson: Same comment as in (e). |
| g) | If a requested data is subject to user consent, the NWDAF and/or the functionality described in e) may check the user consent from the UDM/UDR before the data collection.  NOTE 2: This does not preclude that also other entities (e.g. AMF or SMF) to check availability of user consent with UDM/UDR. | Nokia: Checking user consent from UDM/UDR should be supported by any NF.  Huawei: Agree with Nokia.  Ericsson: Not okay for now. Needs to be further studied. This is premature. SA3 has not decided if the consent checking is done by NWDAF or data provider. SA3 and will come back later. |
| h) | User consent for the user data provided by a data source to a data consumer may have a validity time. On expiry of this validity time, the user data should be either deleted or the user consent for this data to be renegotiated. | Nokia: Providing a validity time of user consent seems to be useful as it allows to reduce the amount of tracked data. It then is the responsibility of the entity that stores user consent that data can be wiped after the validity time passed.  Huawei: Agree with Nokia.  Ericsson: Okay but must be clarified that only \*raw\* or personally identifiable data is under the scope. |
| i) | (Subject to applicability of Data Protection Regulations) in case of user consent revocation at UDM/UDR, NWDAF deletes the related user data and terminates the data collection from the corresponding source NF. | Nokia: Since different regulations can provide different requirements on user consent revocation, it is important to allow for revocation.  Huawei: Agree with Nokia.  Ericsson: Okay in principle. We should clarify that 3GPP can only specify "may" for everything related to consent. "shall" shall not be used because of different regulations. |
| j) | (Subject to applicability of Data Protection Regulations) in case of user consent revocation (at UDM/UDR), the functionality described in bullet item e) may send a request to NWDAF service consumer(s) to delete the related user data/ analytics. | Nokia: In case of user consent revocation it must be possible to delete related user data and related data analytics.  Huawei: Agree. In case of user consent revocation, it is a way to delete the related user data/analytics immediately.  Ericsson: Have to wait for agreement on (e). |
| k) | (Subject to applicability of Data Protection Regulations) in case of user consent revocation (at UDM/UDR), NWDAF service consumer(s) may delete the related user data/analytics on request (refer to bullet item j) or on expiry of validity time (refer to bullet item h). | Nokia: A requirement in line with the conclusion should be added. I.e. NWDAF service consumer(s) may delete the related user data/analytics on request or on expiry of validity time.  Huawei: Agree. In case of user consent revocation, it is a way to delete the related user data/analytics passively.  Ericsson: Same comment as (i). |

# 2 Actions

**To SA2**

**ACTION:** SA3 asks SA2 to take this information into account to allow progressing normative work on user consent and user consent revocation in TS 23.288.

# 3 Dates of next TSG SA WG 3 meetings

SA3#103Bis-e 5 - 9 July 2021 Electronic meeting (TBC)

SA3#104-e 16 - 27 August 2021 Electronic meeting