Privacy-Enhancing Technologies in AML

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Overview from SoK on PETs for Finance [BCDF23]



1. Identity, KYC, AML

2. Legal aspects of PETs

3. Digital Asset Custody

4. Markets & Settlement

5. Future applications

eprint.iacr.org/2023/122

Introduction to (selected) PETs:



 $dec_{sk}([x \cdot y + z]) = x \cdot y + z$

What can we do with each of them?

ΖK

FHE

Private Inputs from **ONE** Party or assuming **TRUSTED** prover



MPC

Private Inputs from **MANY** Parties!



1. Identity, KYC

AML

2. Legal aspects of PETs

4. Markets & Settlement

Challenges: Identity, KYC & AML

Identity / Know Your Customer (KYC)



Anti Money Laundering (AML)



SSO: server breaches

 \rightarrow Secure authentication

Data leakage from credentials

 \rightarrow Anonymous credentials

Legacy issuance systems

 \rightarrow Practical issuance of credentials

Risk profiling exposes private data

 \rightarrow *Private risk profiling across entities*

TX volume analysis violates privacy

 \rightarrow Privacy budget for private transfers

SoK: Overview

1. Identity, KYC

- Secure SSO
- Anonymous credentials
- Practical issuance of credentials

AML

- 2. (Legal aspects of PETs)
- 4. Markets & Settlement

Anonymous credentials



Privacy goals:

Untraceability/unlinkability

- Rerandomizable "credential": unlinkable SID's
- [Chaum82, CL01, CL04, San20]

Controlled attribute release

- Selected attributes (age, scores, ...)
- Selected, arbitrary attribute relations

Revocation

- Certificate revocation: nullifiers/accumulators [CL02]
- Privacy revocation triggered by auditor policy [KLN22]
- Publicly auditable revocation [BDGPW23]

Credential issuance from legacy services



Challenge: Legacy issuers slow to adopt state-of-the-art crypto

Solution(s): Bridge legacy issuer and anonymous credentialing

Verifiable responses from TLS sessions

- TLS provides authenticated response from issuer
- Move TLS client inside TTP
 - TEE: Town Crier [ZCC+16]
 - MPC: DECO [ZMM+20]

Credential bootstrapping from legacy services

- MPC issues credentials w/ legacy web service: CANDID [MMZ+21]

1. Identity, KYC

AML

- Private risk score mgmt
- Privacy budgets
- 2. (Legal aspects of PETs)

4. Markets & Settlement

AML: Compliant AML analysis

Risk classification



Compliance

- Privacy: user consent (GDPR)
- AML:
 - Explainability: suspicious "flag" requires evidence/data Auditability: MPC committee with "auditing" member

Compliant AML risk management across financial institutions

- Transactions, Entities, Risk factors
- Obliviously propagate suspicious sources [vERS21]
- Dedicated ML auditor [ZOP20]
- Specific-purpose transaction graph analysis [vEDBRSPV24]

AML: Non-interactive Collaborative Risk Analysis with Updatable Privacy Preserving Blueprints [DEFKPV24]



Compliance

- Privacy: user consent (GDPR)
- AML:
 - Explainability: suspicious "flag" is accompanied by blueprint containing exceeded risk score, which can be verified
 - Auditability: Each bank (or an auditor) learns if risk threshold is exceeded, but nothing else

Collaborative but Non-interactive AML across financial institutions

- Transactions, Entities, Risk factors
- Banks updates local receiver risk scores w.r.t. sender's risk score
- Risk scores maintained by each bank remain private
- Audit trail shows exactly at which point risk exceeded a threshold

Banks locally update blueprints containing risk scores accompanied by proofs of validity, if risk is above threshold, banks (or auditor) learn **only** that threshold is exceeded.

AML: CBDC with privacy budgets



UTT: Decentralized Ecash with Accountable Privacy [TBAAGPY22]

Registration authority

- Issues anonymous registration credentials
- Prevents sybil attacks on privacy budget

Auditor

- Issues privacy budget for each registered entity
- Privacy budget is proven to bank during transfers

Bank

- Issues confidential, spendable tokens
- Privacy-preserving payments consume privacy budget

AML: Cryptocurrencies (centrally banked or not) with privacy budgets via Updatable Privacy Preserving Blueprints [DEFKPV24]



Implementing Privacy Budgets with uBlu

Auditor

- Issues privacy budget for each registered entity
- Audits transaction to detect exceeded budgets

User

- At every transaction update a blueprint keeping track of their own privacy budget (which can be verified)

Cryptocurrency

- Only transactions accompanied by a valid privacy budget blueprint update are processed.

1. Identity, KYC, AML

2. Legal aspects of PETs

- GDPR & PETs
- PETs in Law & Business

4. Markets & Settlement

PETs in Law & Business

| ZK | МРС |
|--|--|
| Law enforcement | |
| Court evidence [BCGW22] | Collaboration between enforcement agencies |
| Proof that proprietary algorithms, models do not violate law | Over potentially classified information |
| Secret laws [GP18] | |
| Satisfaction of secret laws proven (in publicly verifiable manner) | |
| Business | |
| Due diligence | Credit score computation [DDN+16] |
| Proof that proprietary knowledge, models, or data satisfy claims. | Over sensitive private information |

- 1. Identity, KYC, AML
- 2. (Legal aspects of PETs)

4. Markets & Settlement

- PETs & markets in traditional markets
- PETs & markets with public ledgers
- PETs & demand-response markets
- PETs & interbank netting

Dark Pools with MPC/FHE

[BDP20]





Continuous double auctions w/ MPC [CSTA19]

- Expensive scanning of secret limit order book (LOB)
- Expensive insertion into LOB
- 35-40 orders/second (on expected LOB size of 30)

Periodic double auctions w/ MPC [CSTA21]

- Clearing at single price for all limit orders in round
- 2000 orders every 5s across 4000 assets
- Gateway MPC assigns assets across 280 MPC instances
- Volume matching only improves throughput [dGCP+22]
- Large committee sizes [dGCSA22]

Periodic double auctions w/ FHE [BDP20]

- FHE key is jointly computed and stored by "institutions"
- FHE evaluator performs matching of orders

Combining MPC and Differential Privacy [CDdGL23]

- Compute order matching in MPC and add noise
- Seeing outcome of own orders does not allow a party to learn about another party's strategy

SoK: Overview

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Presentation: short overview

SoK: PETs in Finance eprint.iacr.org/2023/122

SoK: front-running mitigation in DeFi [DeFi'22] eprint.iacr.org/**2021**/1628

Privacy-preserving decentralized exchanges and AMMs





Intent-based, private DEX

- No "matching" by algorithm; self-discovery of peers
- Atomic swap with counterparty [BCG+20] [NMKW21]

Private DEX/AMM

- P2DEX: Cross-ledger DEX with MPC order matching [BDF21]
- Eagle: private smart contracts with MPC [BCDF23]
- Many more in "SoK: front-running mitigation" [BCDFG22]

Private DEX for futures

- Future obligation to buy/sell are traded
- Net position: liquidity and future obligations
- Price manipulation can force liquidation if net position leaked
- Net position privacy with zero-knowledge [NMKW21]

Private DEX/AMM via MPC (e.g. Eagle)+Differential Privacy [CDdGL23]

- Compute order matching in MPC and add noise
- Seeing outcome of own orders does not allow a party to learn about another party's strategy

Summary



- General purpose MPC allows for any kind of collaboration (plus automating private financial transactions)
- Specific purpose protocols may perform better for certain AML mechanisms (e.g. privacy budgets, graphs)

MPC+Differential Privacy for Market Making : eprint.iacr.org/2023/943

SoK on PETs for Finance: eprint.iacr.org/**2023**/**122** Non-interactive AML via PETs: eprint.iacr.org/**2023**/**1787** Privacy Preserving Smart Contracts: eprint.iacr.org/2022/1435