



# Privacy for Central Bank Digital Currencies

Jeremy Clark



**GINA CODY**  
SCHOOL OF ENGINEERING  
AND COMPUTER SCIENCE

# FUNDING & PARTNERS:



**catallaxy**



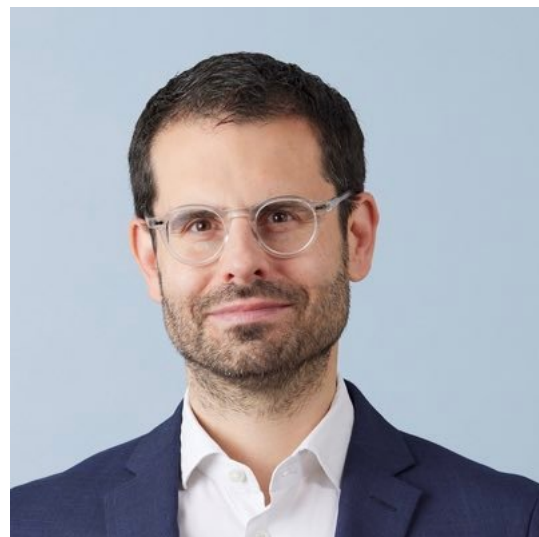
Office of the  
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of Canada



**DIDEM DEMIRAG, CONCORDIA UNIVERSITY**



**RAINER BÖHME, UNIVERSITY OF INNSBRUCK**



**RAPHAEL AUER, BANK FOR INTERNATIONAL SETTLEMENTS (BIS)**



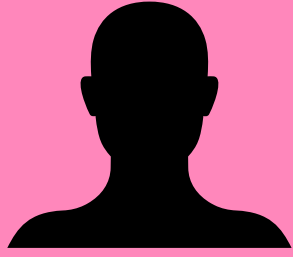
**JEREMY CLARK, CONCORDIA UNIVERSITY**

- **Central Bank: direct claim (or liability) of the central bank**
- **Digital Currency: in electronic or digital format**

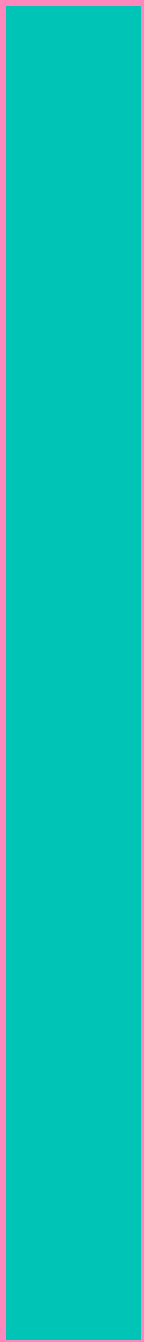
- **Central Bank:** direct claim (or liability) of *some* central bank
- **Digital Currency:** in electronic or digital format



**Firm**



**Person**



**\$\$\$**



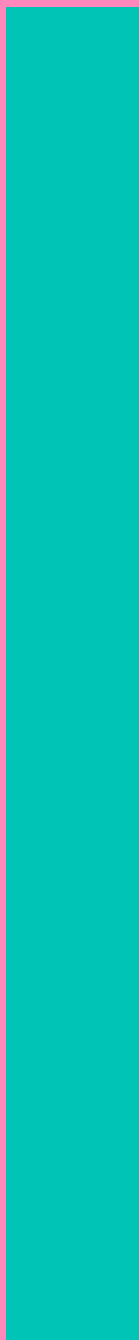
Firm



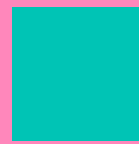
Person



Bank

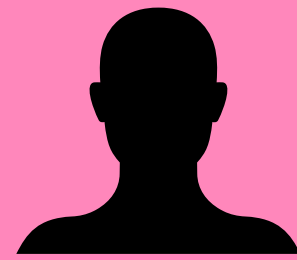


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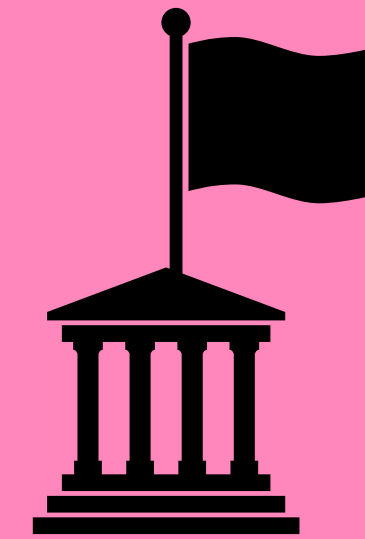
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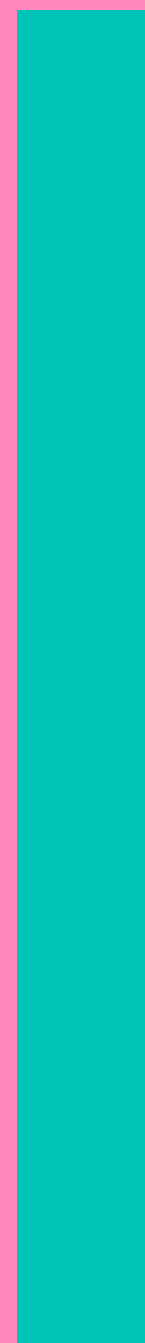
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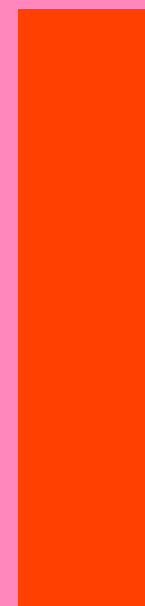
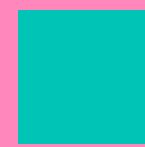
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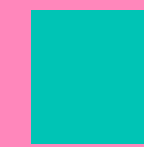
Central Bank



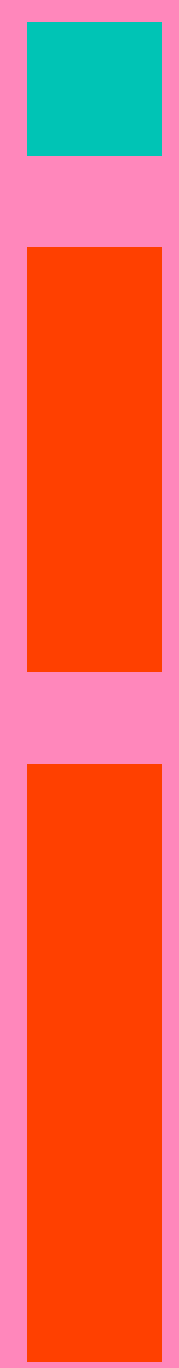
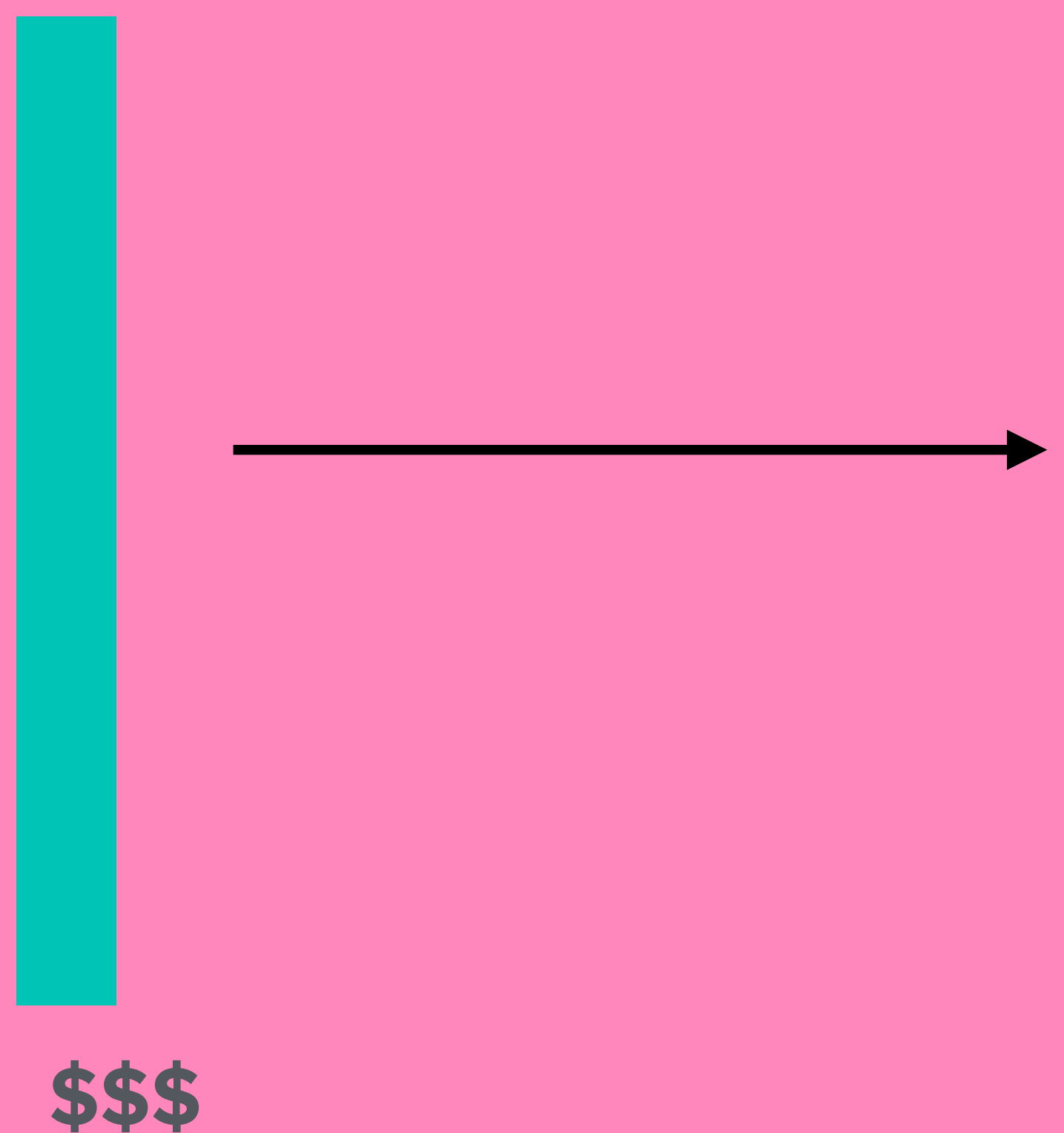
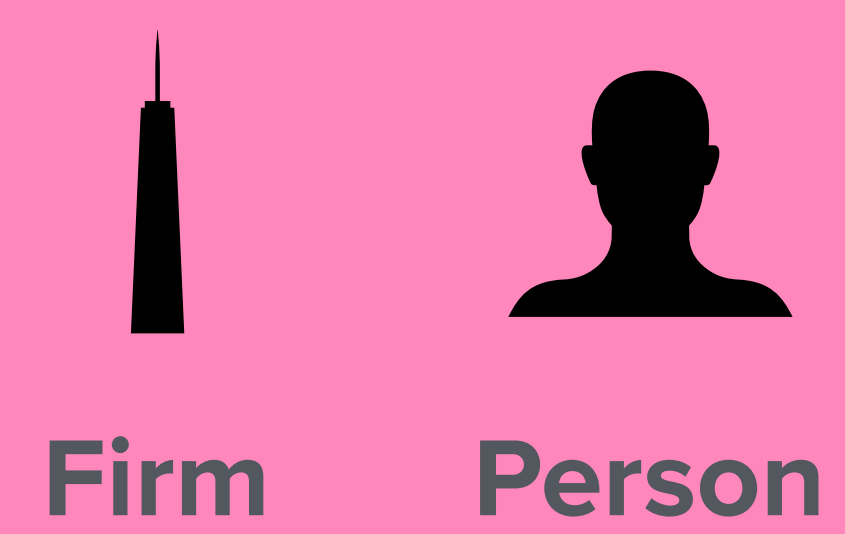
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Deposit



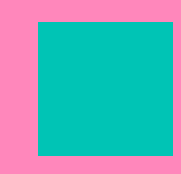
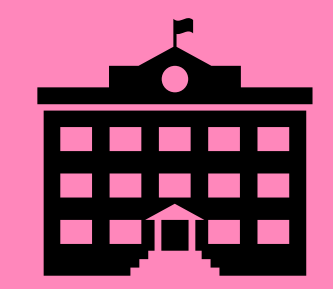




Risk but insured

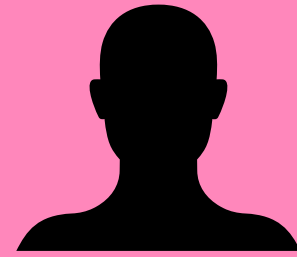
Risk

Deposit Insurance





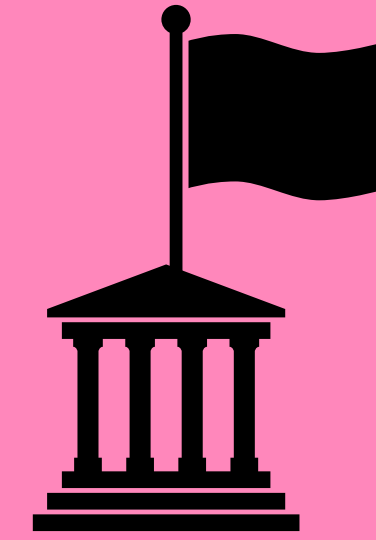
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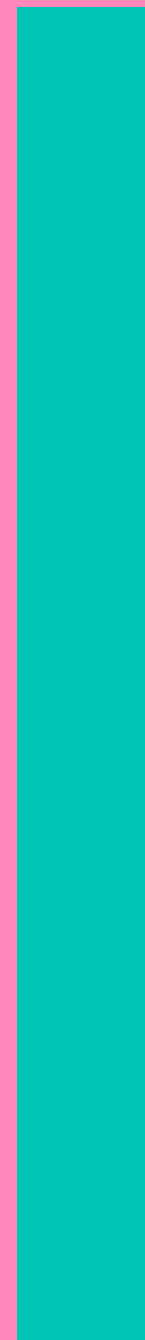
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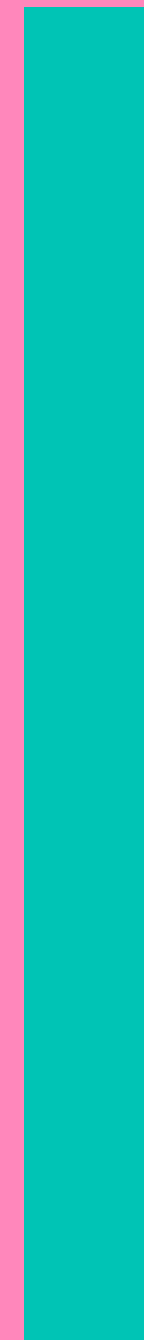
Narrow Bank



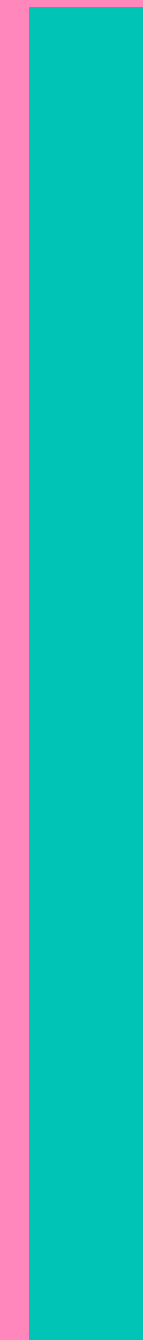
Central Bank



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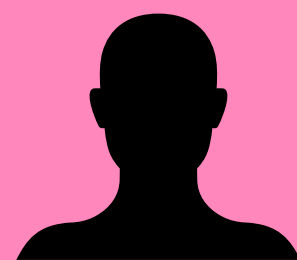


Deposit





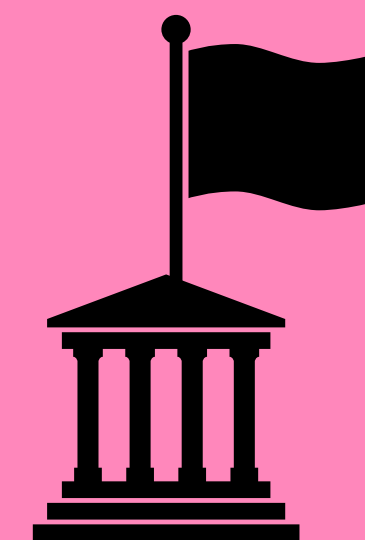
**Firm**



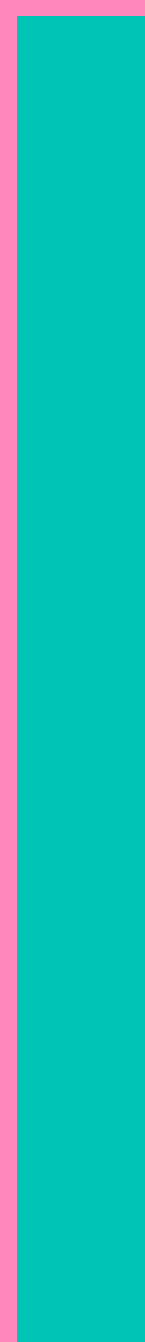
**Person**



**Bank**

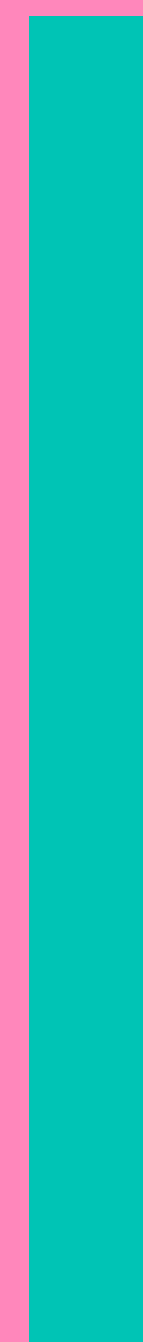


**Central Bank**

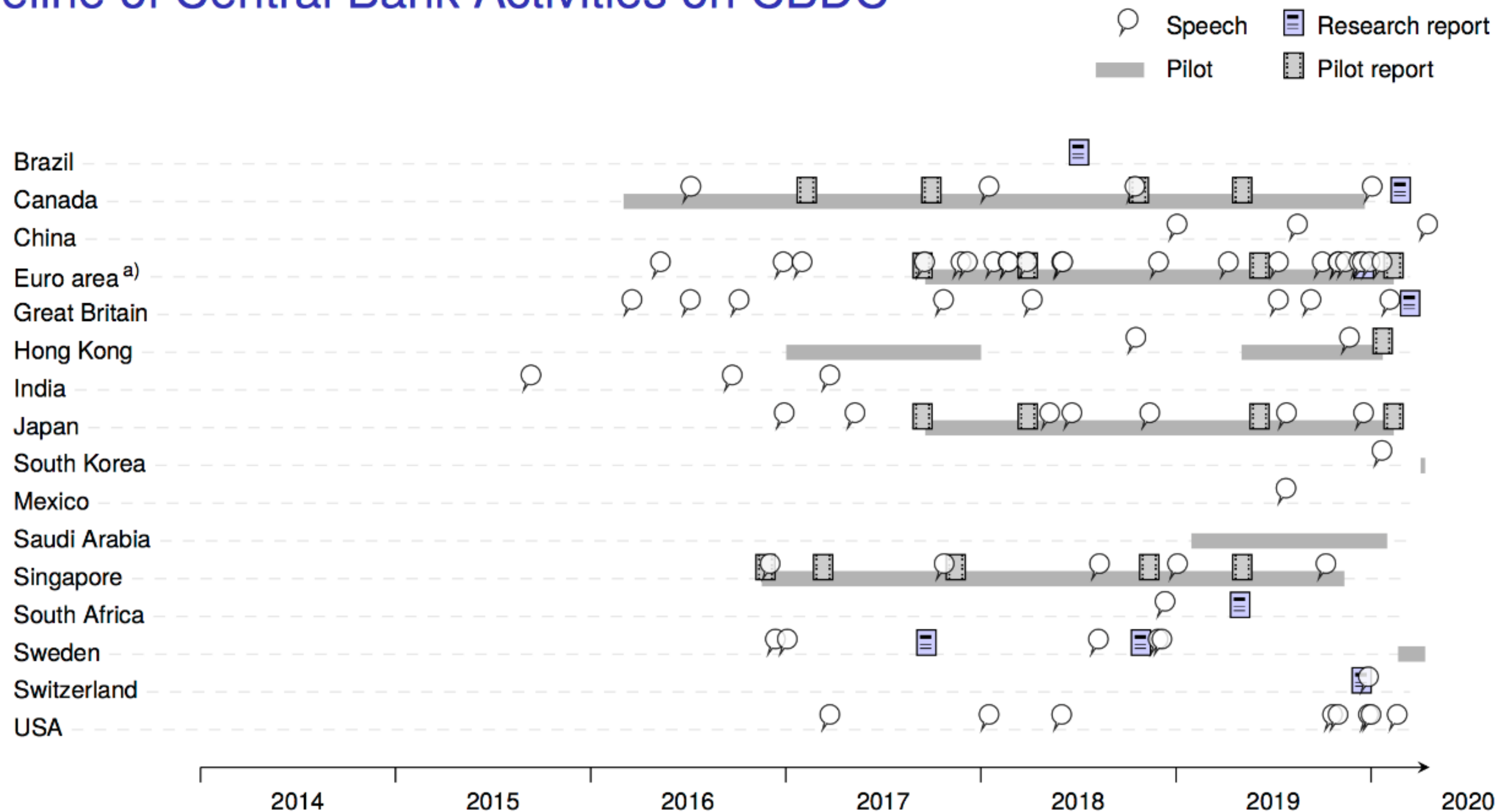


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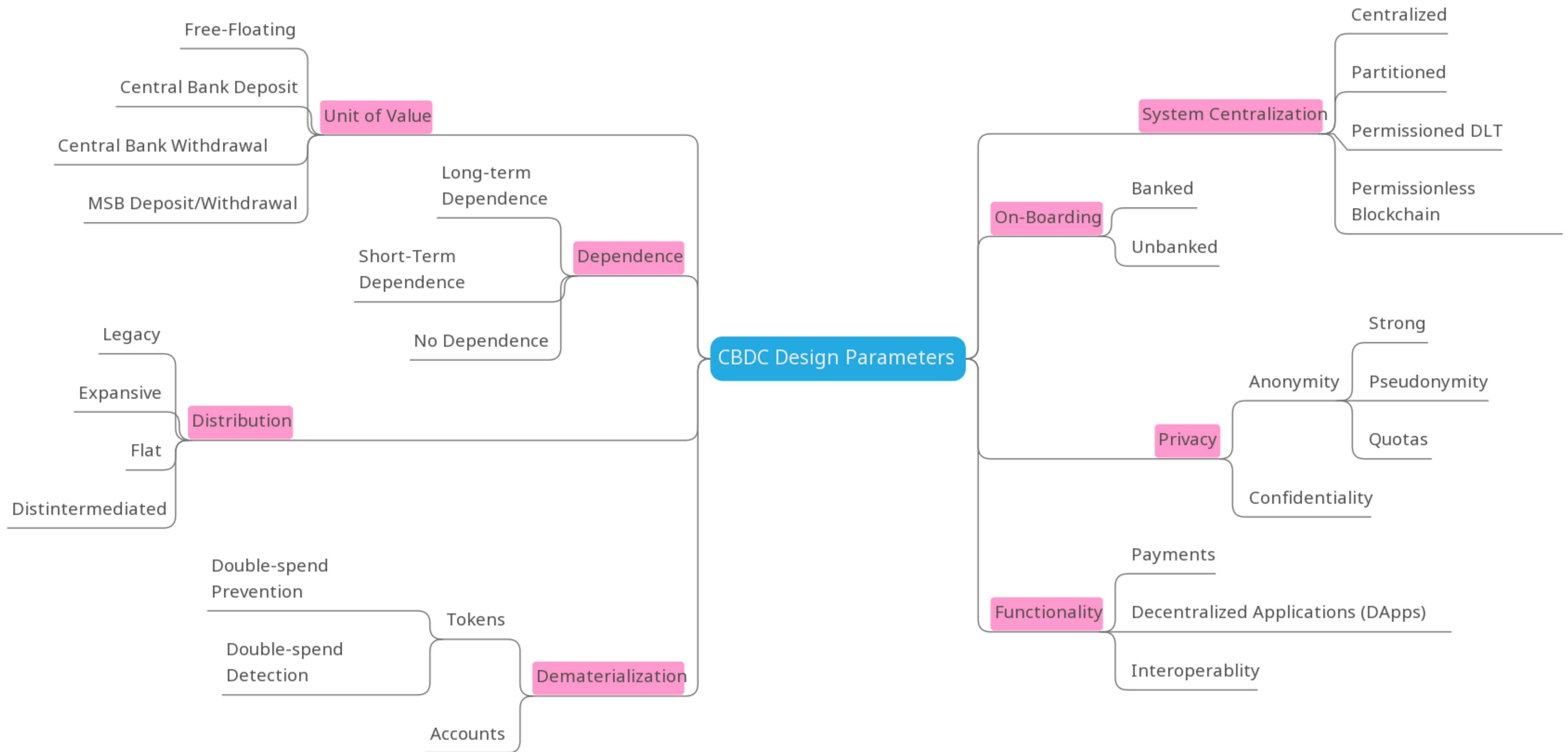
**Deposit**



# Timeline of Central Bank Activities on CBDC



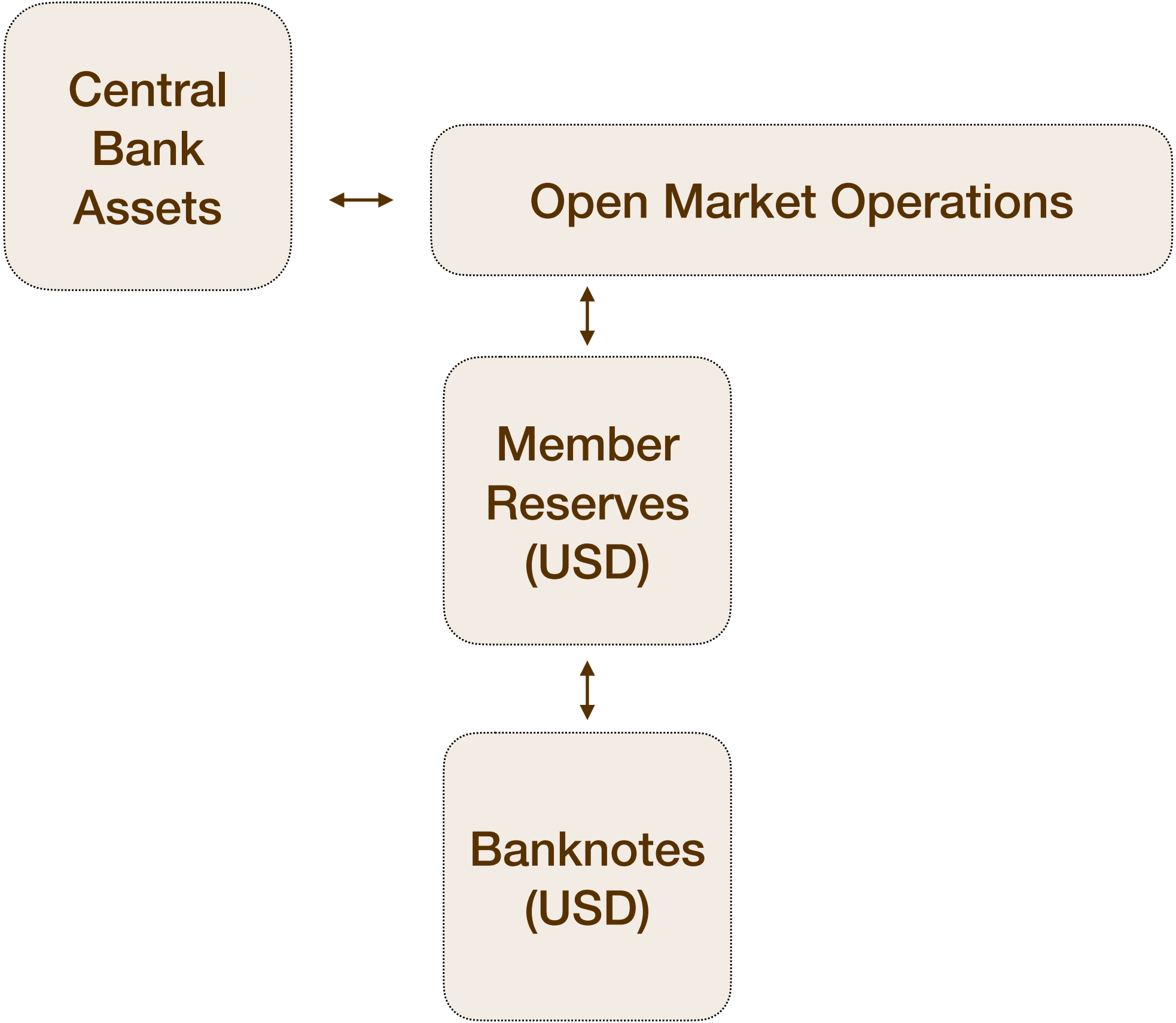
<sup>a)</sup> excluding activities of national central banks within the Eurosystem

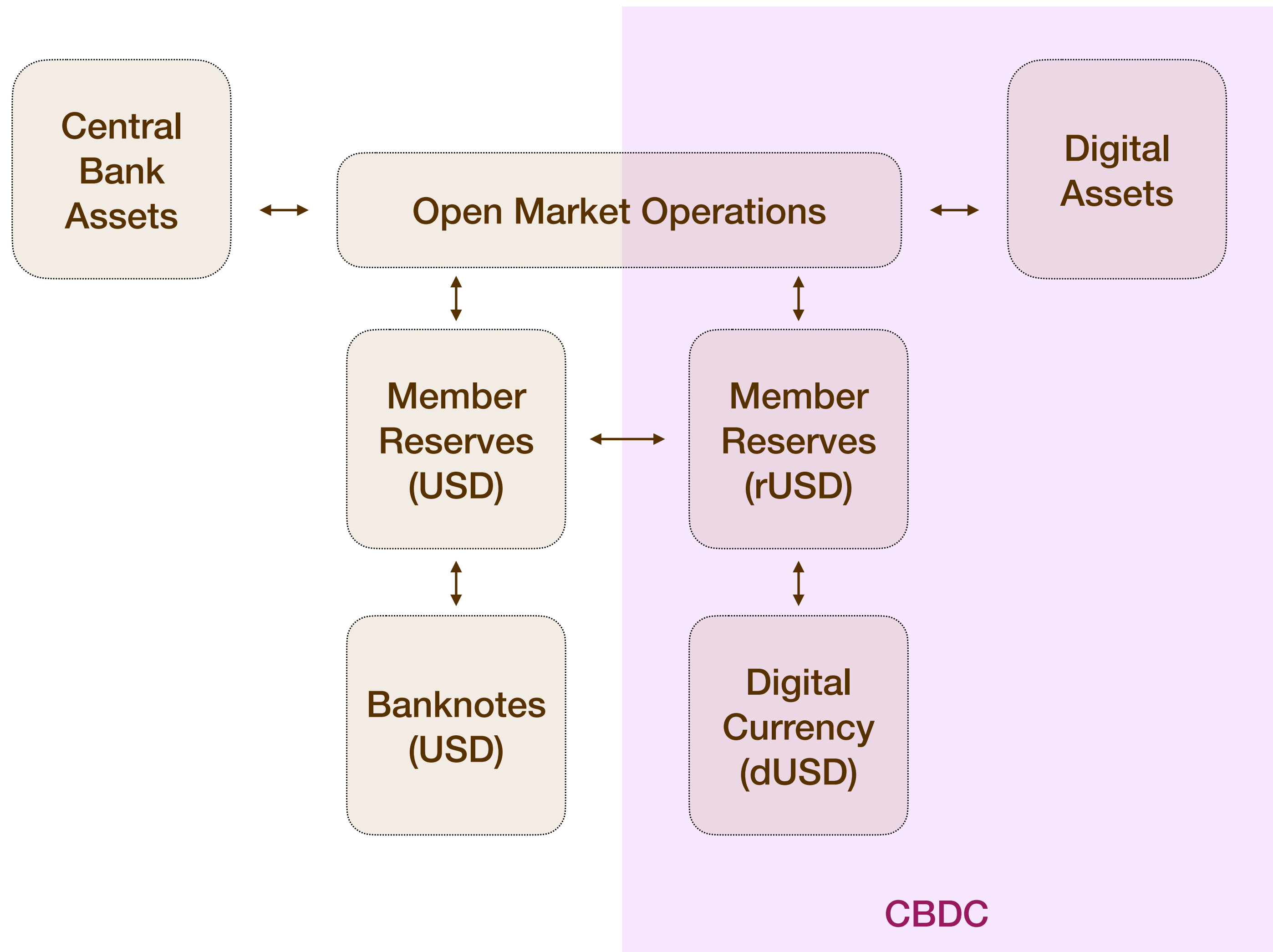


# Unit of Value

System provider  
Issuer  
Oversight

Unit of Value	Enactable by	Description	CB Role		
Free-Floating	RSCoin [33]	The digital currency is managed by the central bank but is not directly tied to the governmental currency	●	●	●
Central Bank Deposit	Fedcoin [49], DDR [62], Account-based e-krona [72, 73]	1 dUSD is equivalent in value to 1 USD that is currently deposited in an account with the central bank. An owner of 1 dUSD is entitled to the interest that would be paid at the bank's deposit rate. An owner of 1 dUSD can redeem it for a deposit of 1 USD into their reserve account at the central bank.	●	●	●
Central Bank Withdrawal	Value-based e-krona [72, 73]	1 dUSD is equivalent in value to 1 USD that has been withdrawn from an account with the central bank. An owner of 1 dUSD can redeem it for a deposit of 1 USD into their reserve account at the central bank.		●	●
MSB Issuance	Digicash [28], Liberty Reserve [65], 'Stablecoins' [30], JPM Coin [44]	The same as <i>central bank deposit/withdrawal</i> above except that the CBDC is issued by member banks or MSBs instead of the central bank. The central bank does not play an active role. It only provides regulatory oversight.			●

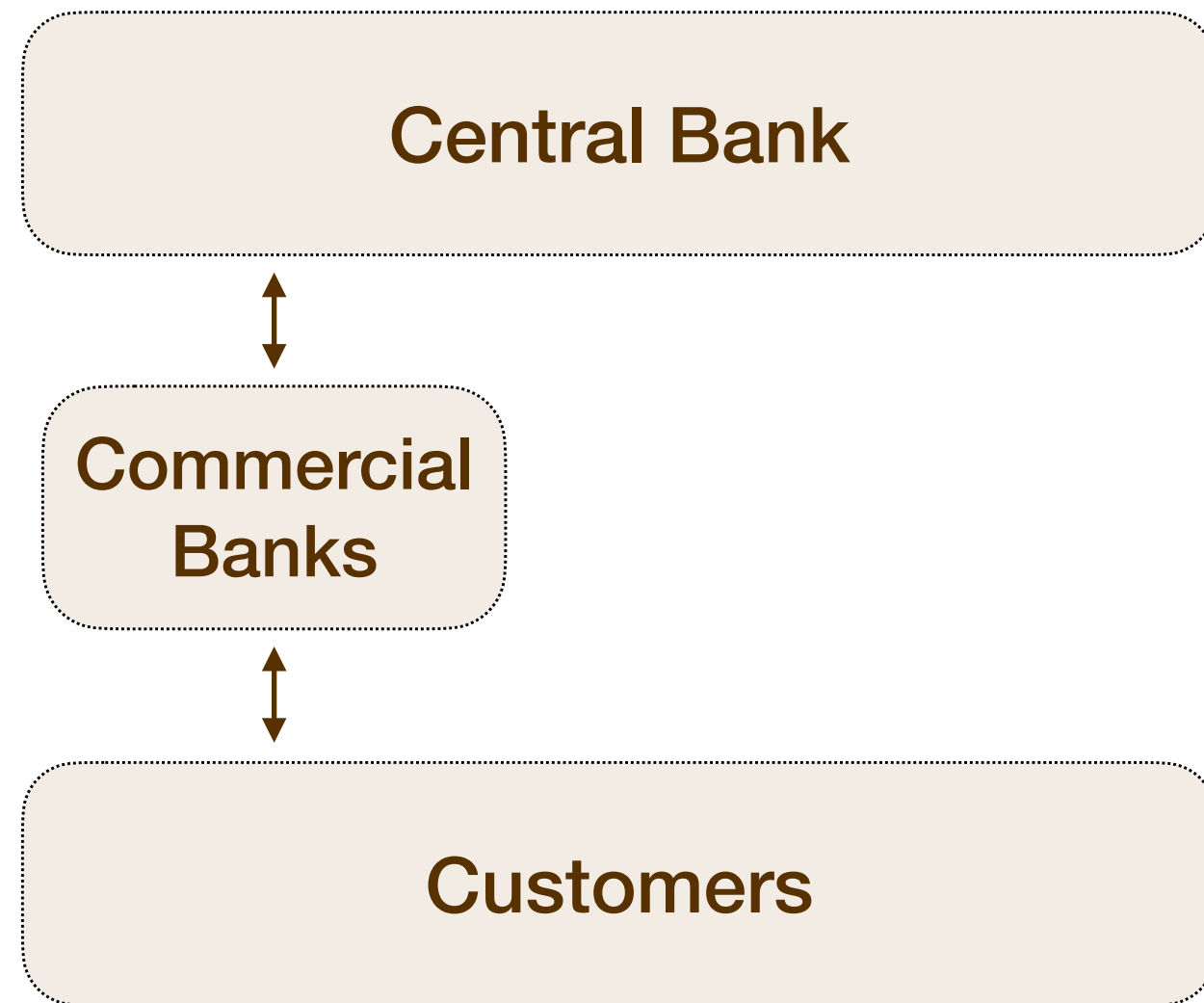






# Distribution

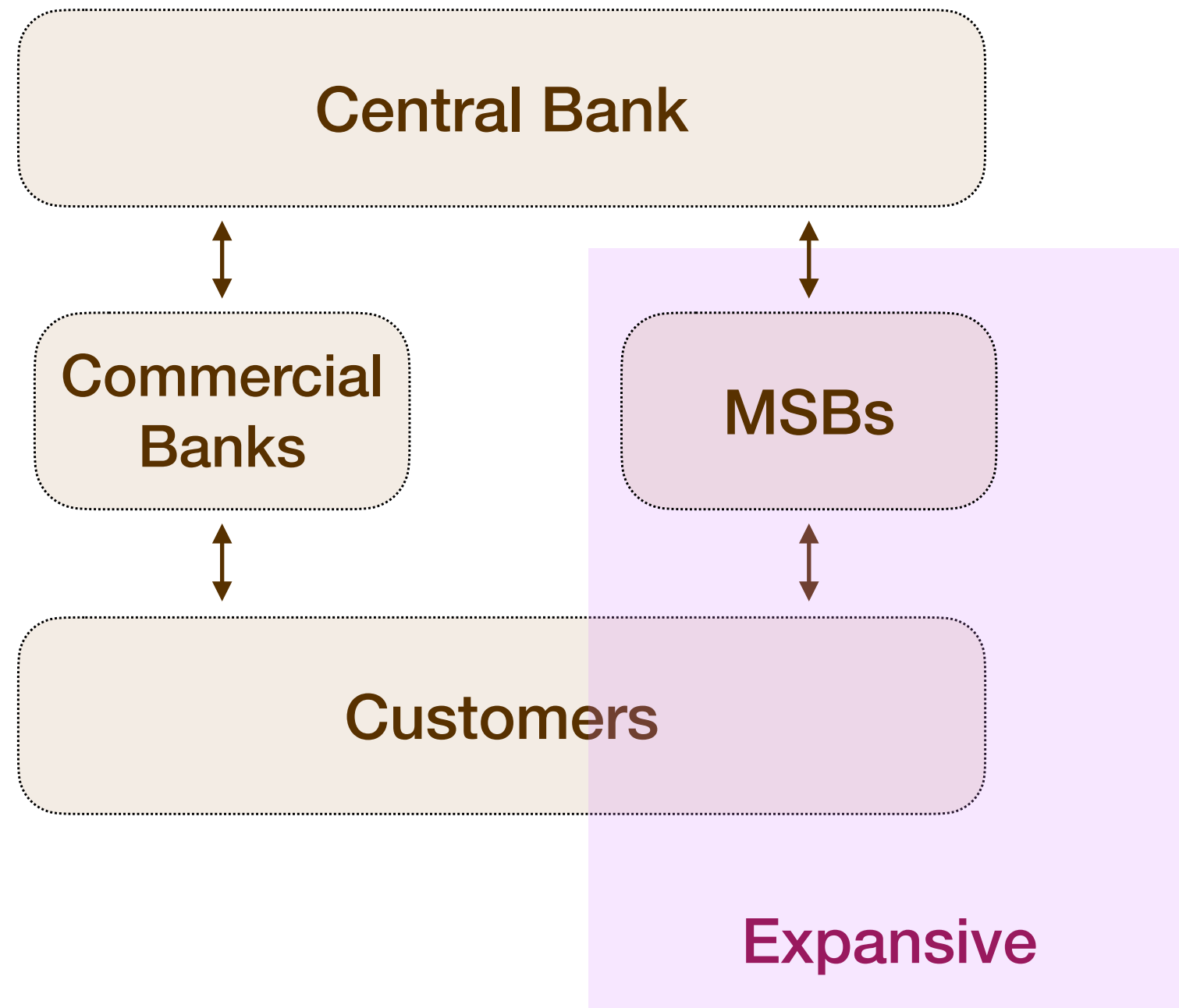
Legacy/Expansive



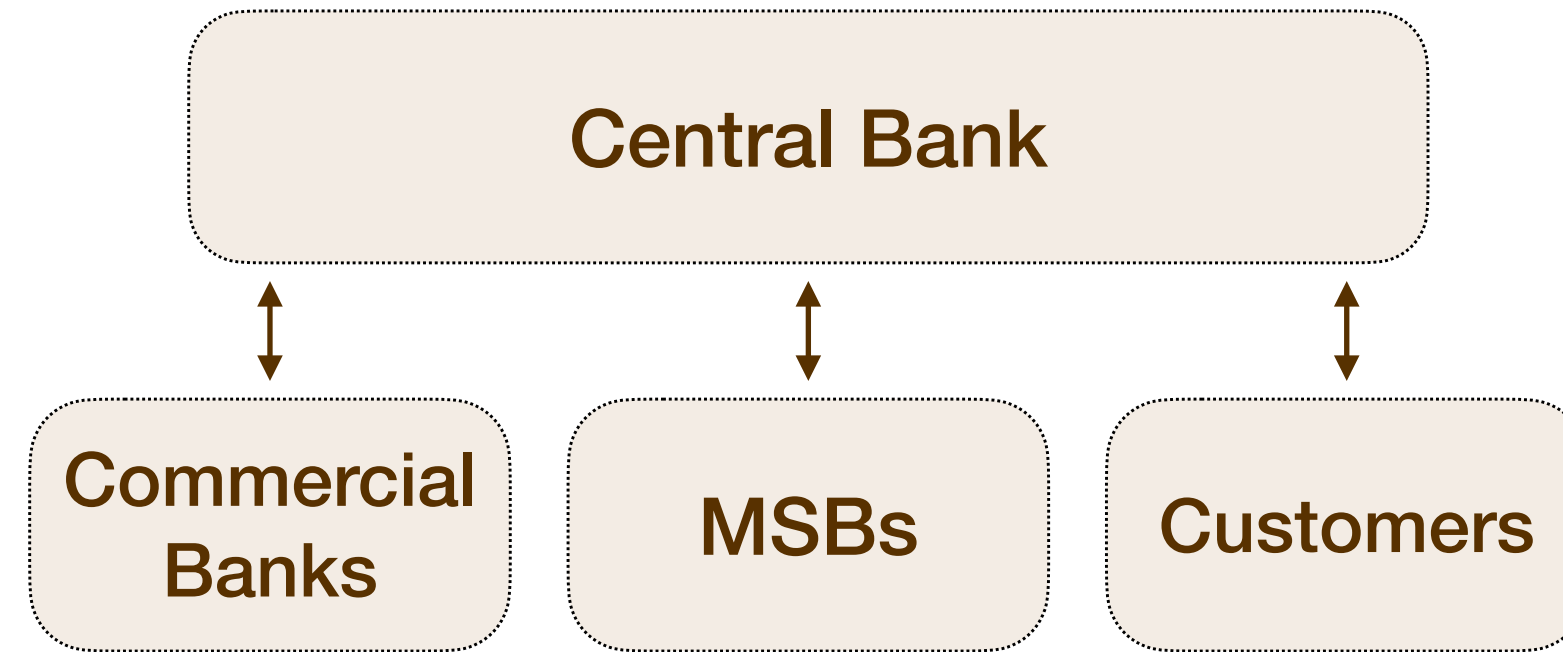


# Distribution

Legacy/Expansive

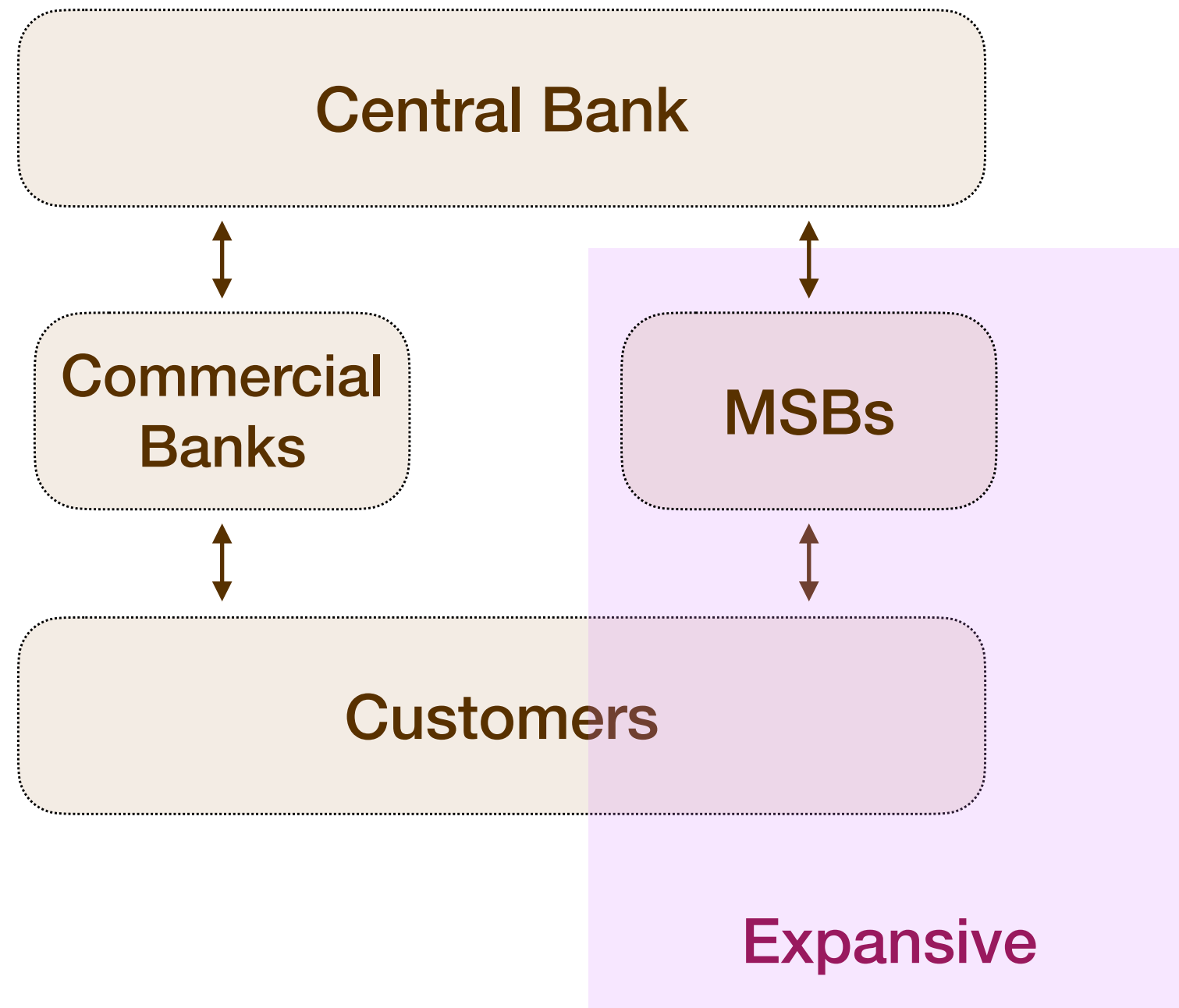


Flat

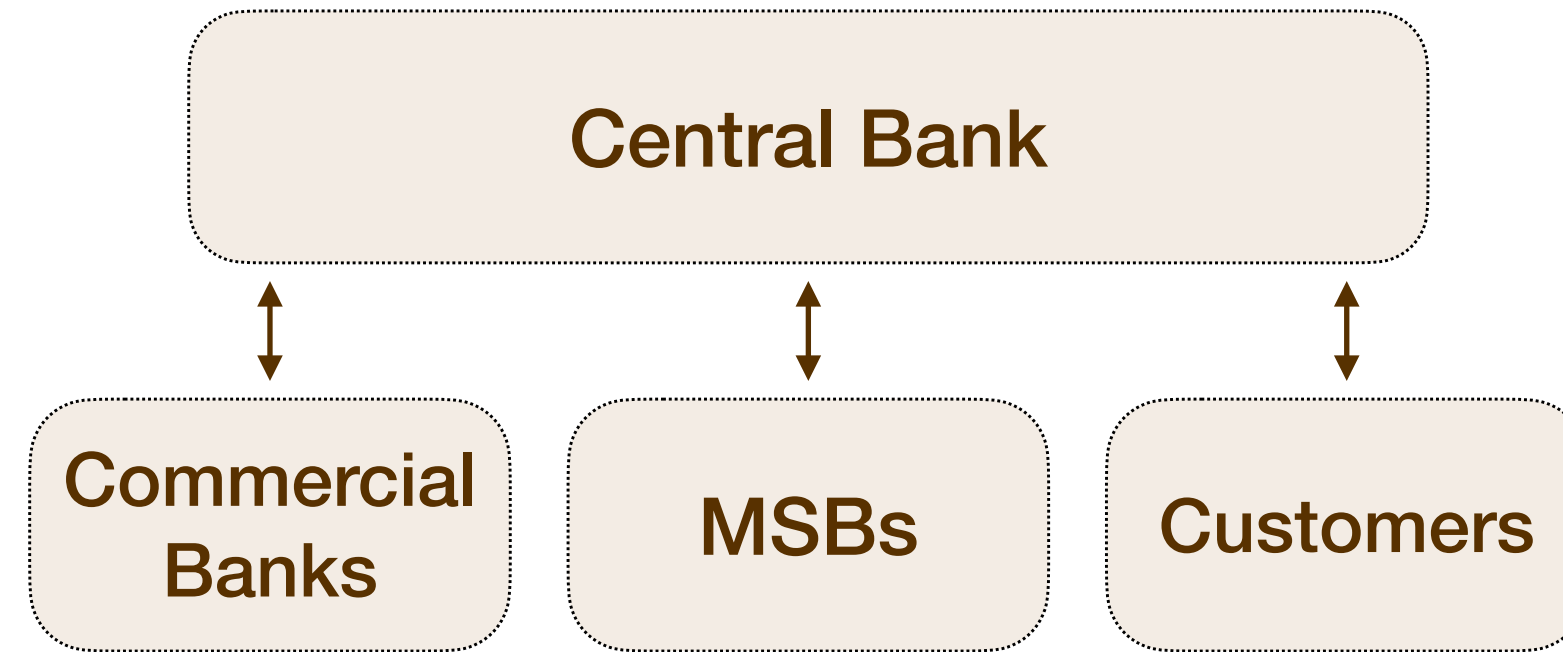


# Distribution

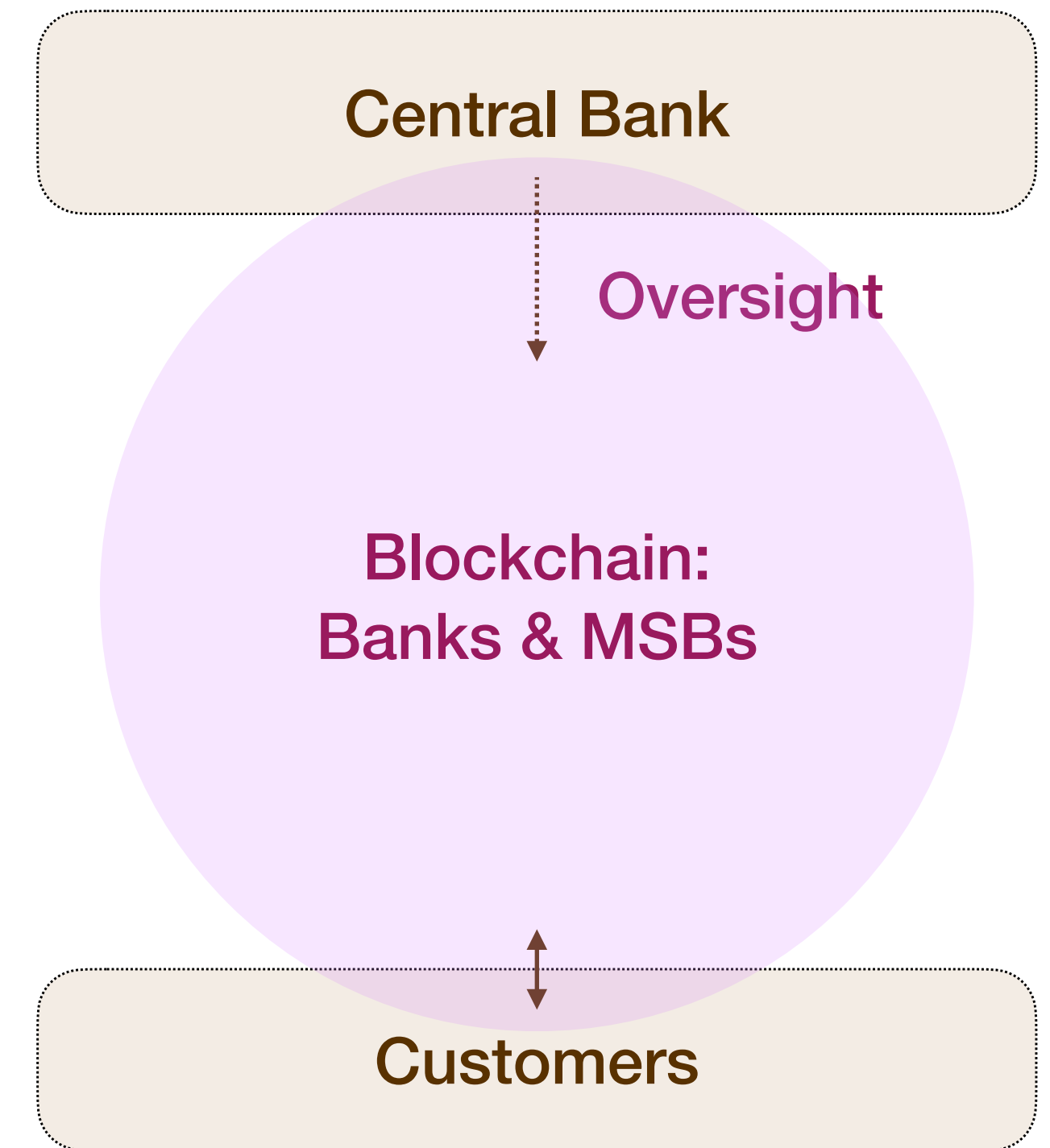
Legacy/Expansive



Flat



Disintermediated



## System Centralization

- Blockchain or not?





method(x)





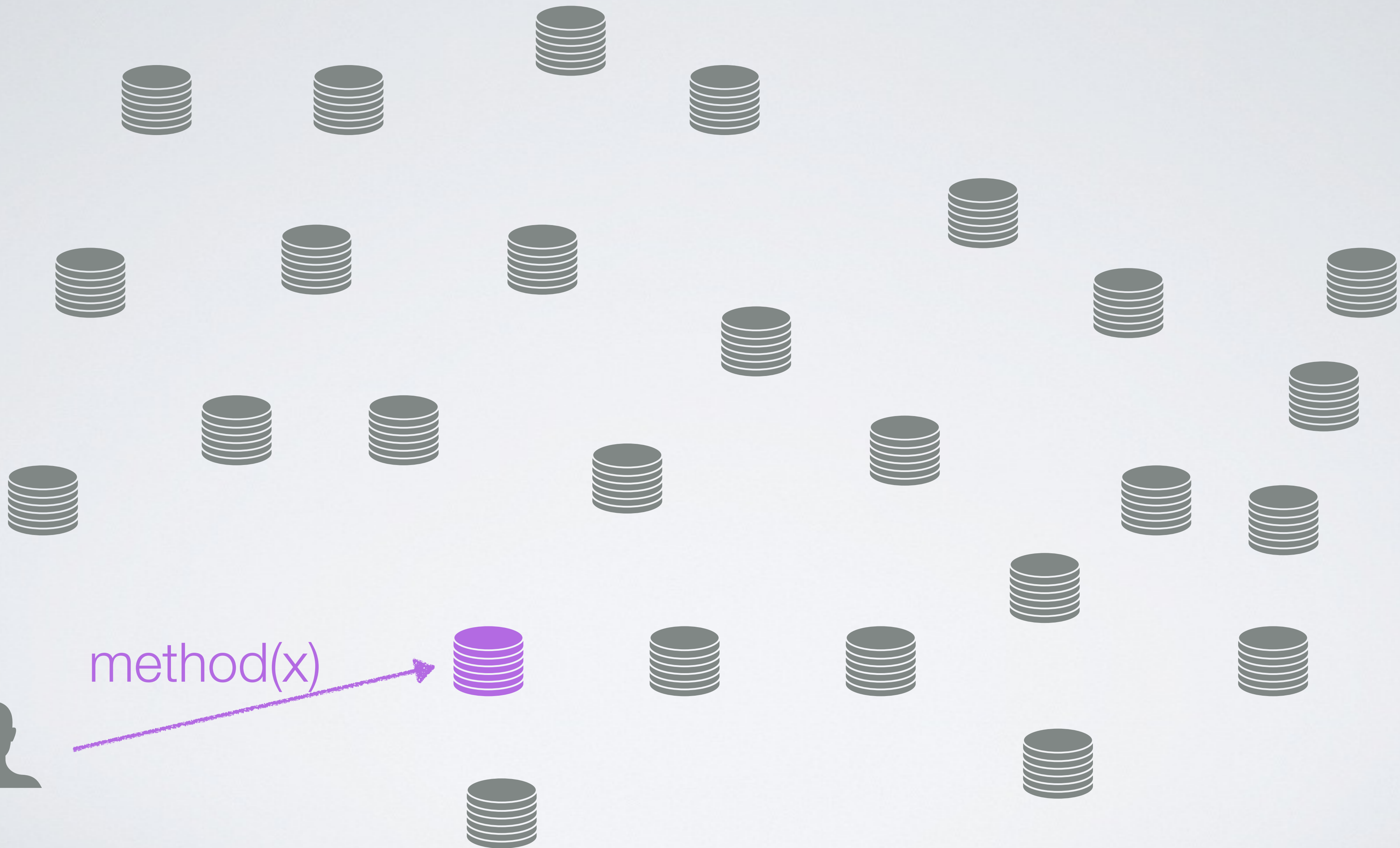
method(x)

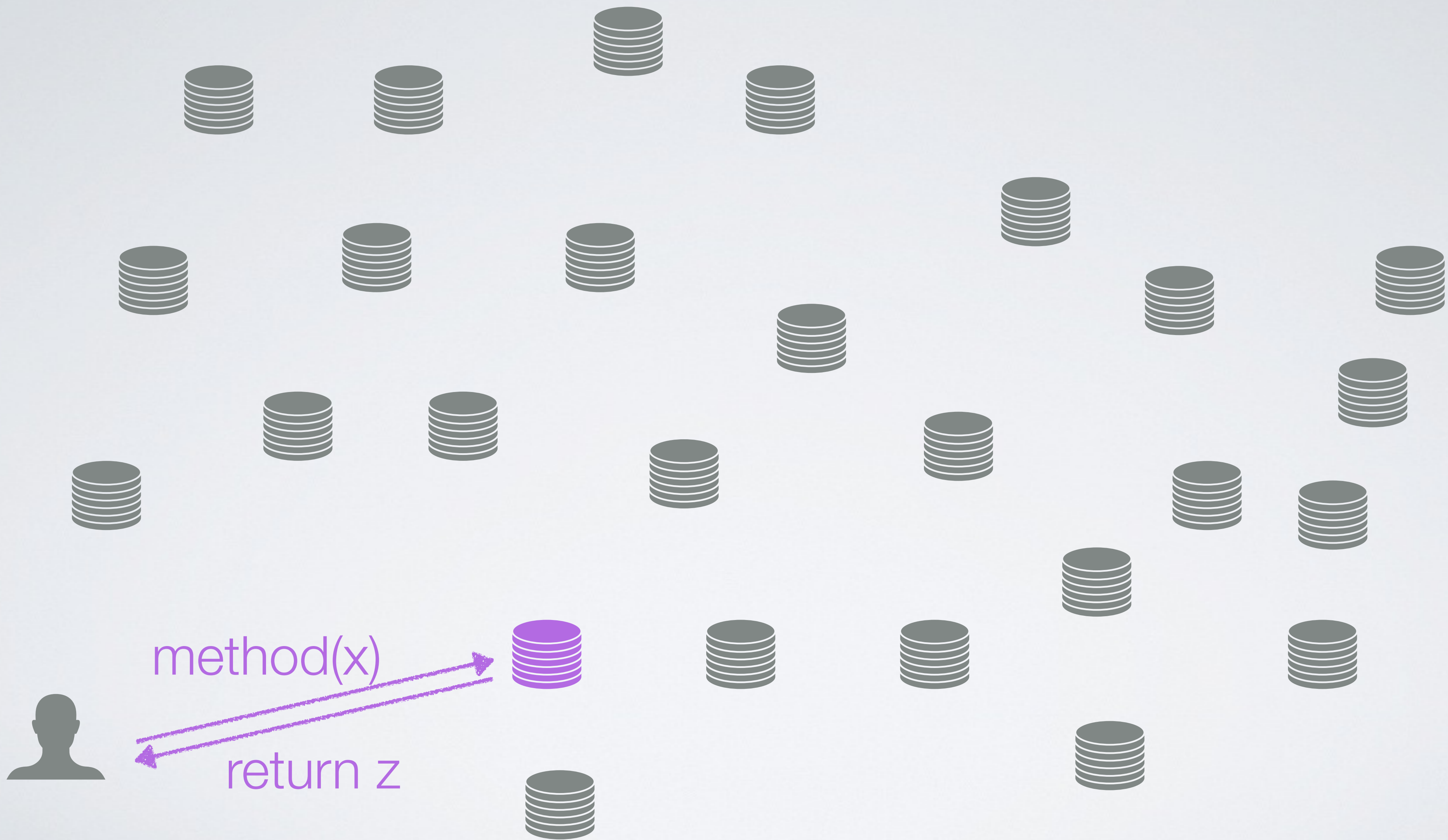




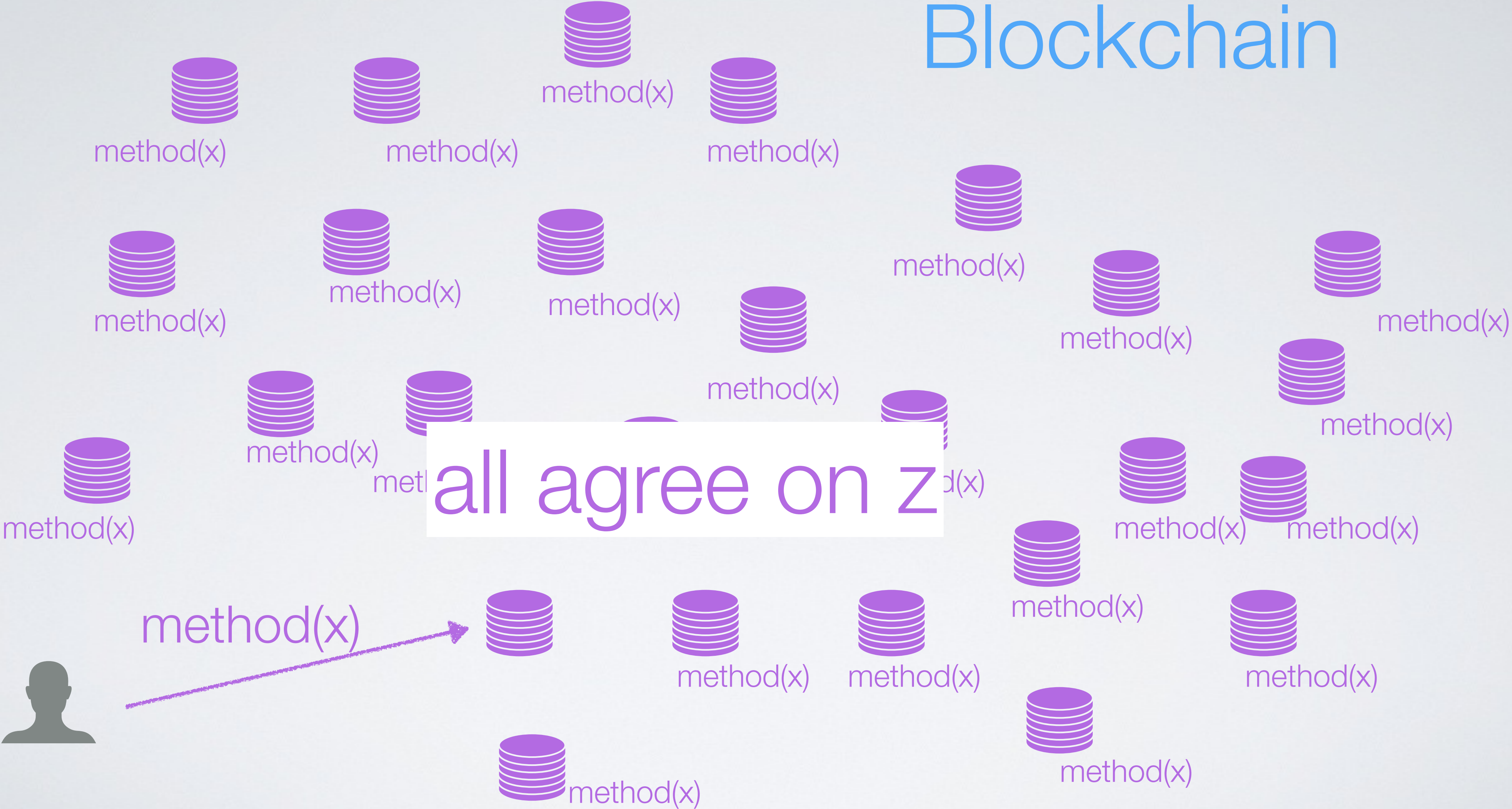


method(x)





# Blockchain





- Blockchains and (distributed) systems/databases are similar
- Blockchains are suitable for very small data (e.g., 1MB every 10 min)
- Blockchains do not support complex queries (“give me everything”)
- Blockchains offer security guarantees: code executes correctly, data is immutable, some nodes can be malicious nodes

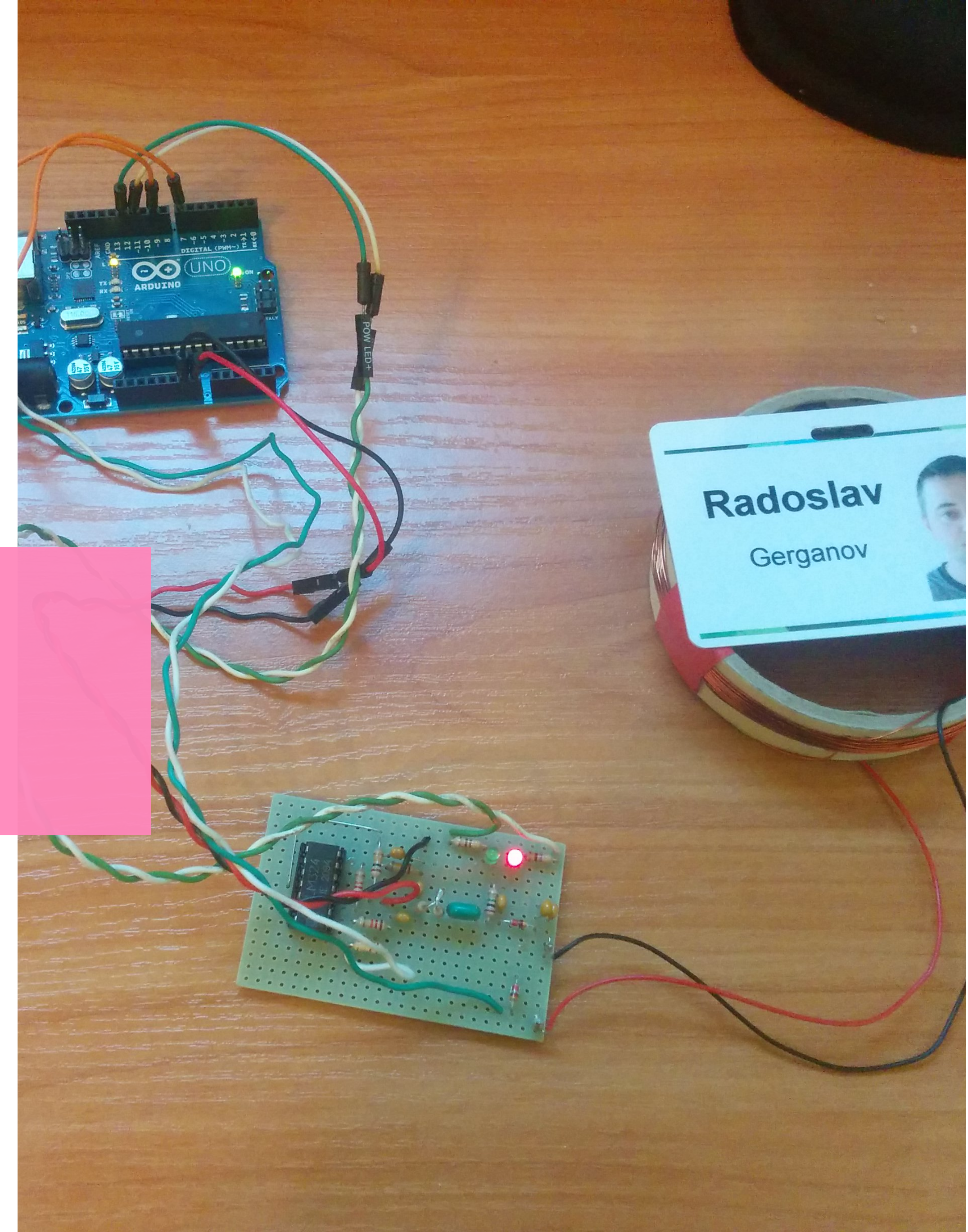


## **System Centralization**

- **Blockchain or not?**

## **System Functionality**

- **Payments only**
- **Payments + Web3**



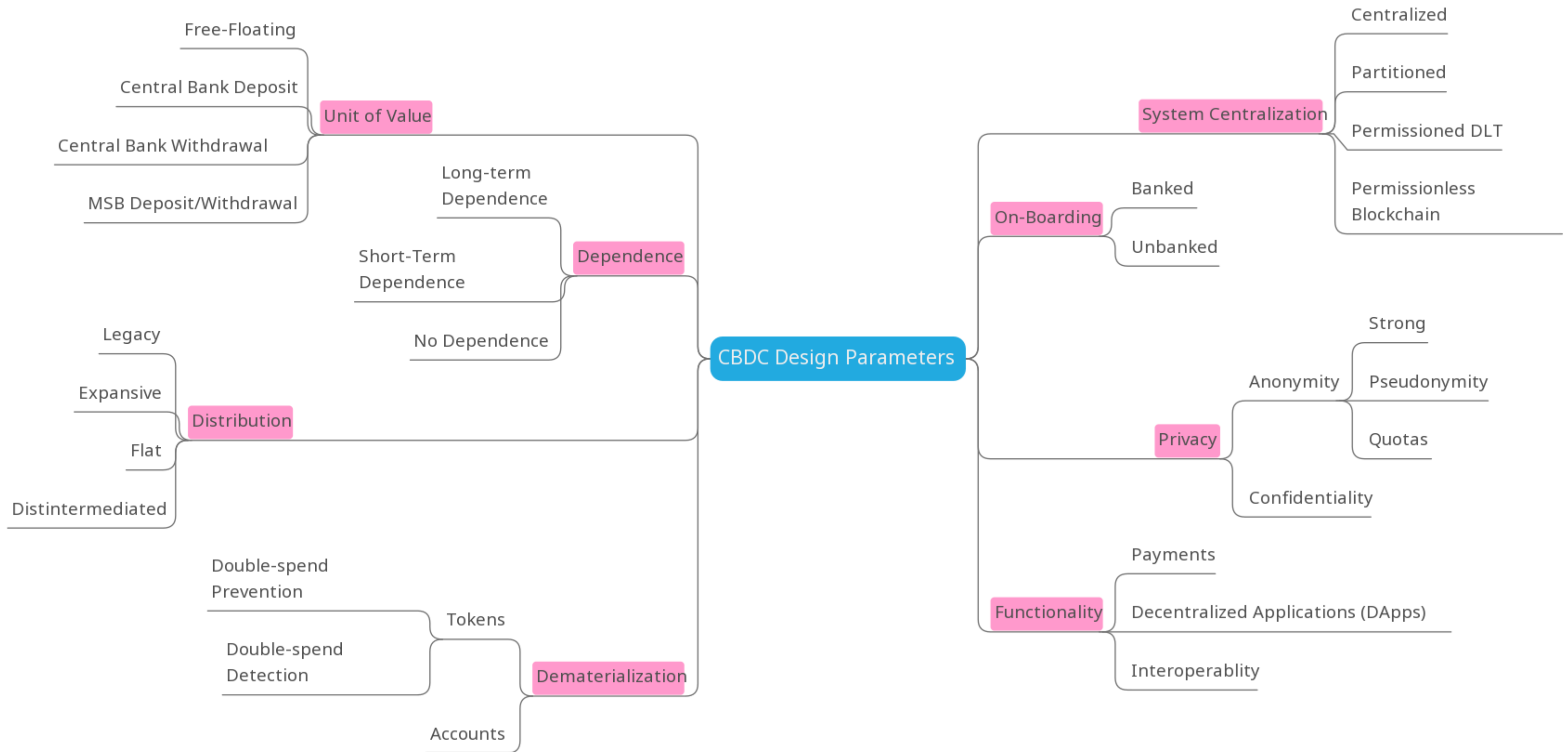
## Dematerialization

- Tokens
- Accounts

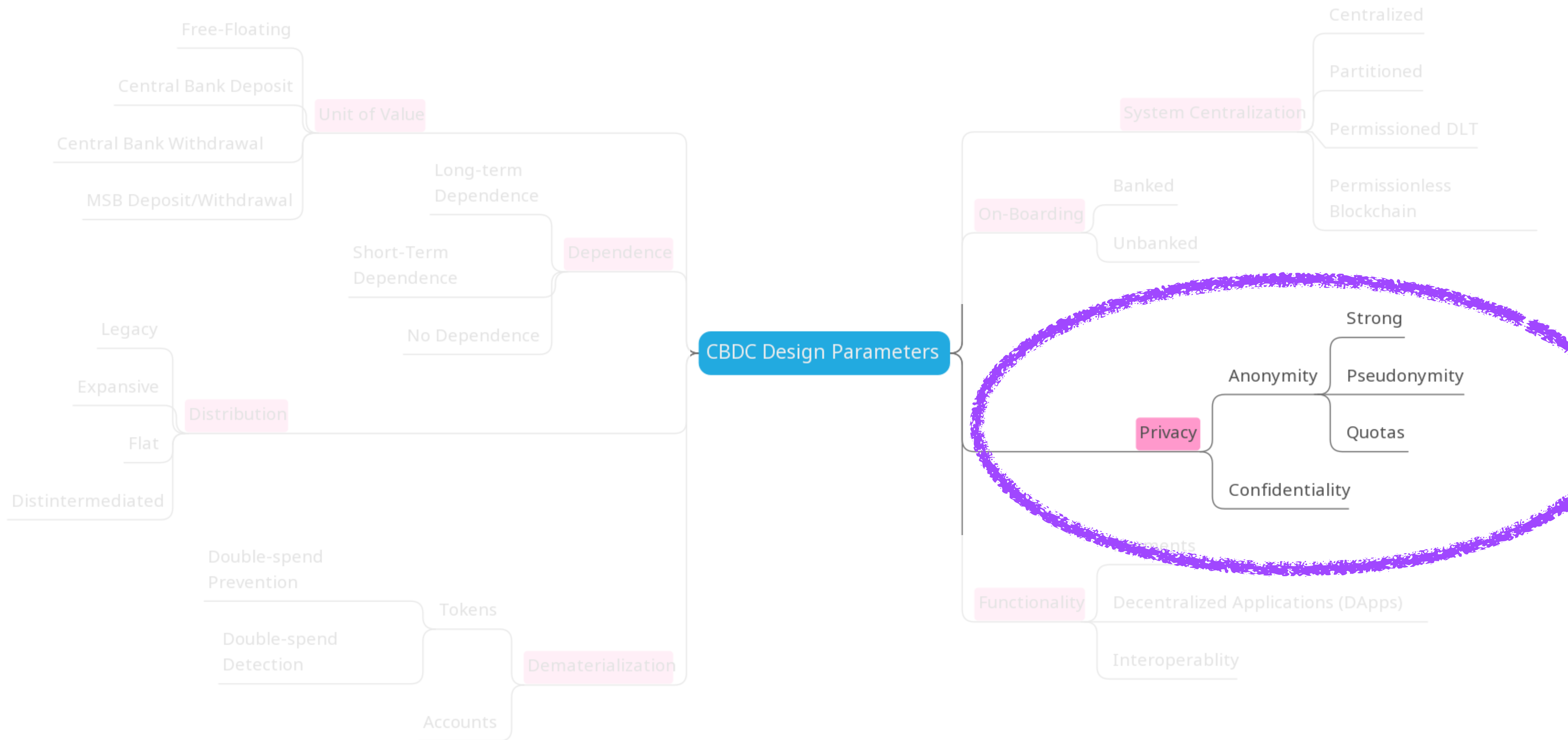


## **Discussion Points:**

- Institutional Risks**
- Unconventional Monetary Policies (QE, NIRP, Helicopter money)**
- Future of Banknotes**
- Sanctions**
- Data Tracking**
- Usability**



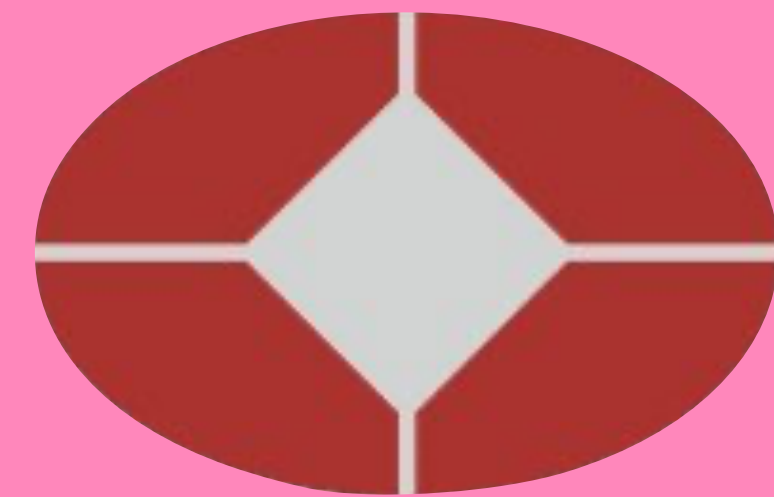




In designing money, national authorities already face a trade-off between satisfying legitimate user preferences for privacy and mitigating risks to financial integrity.

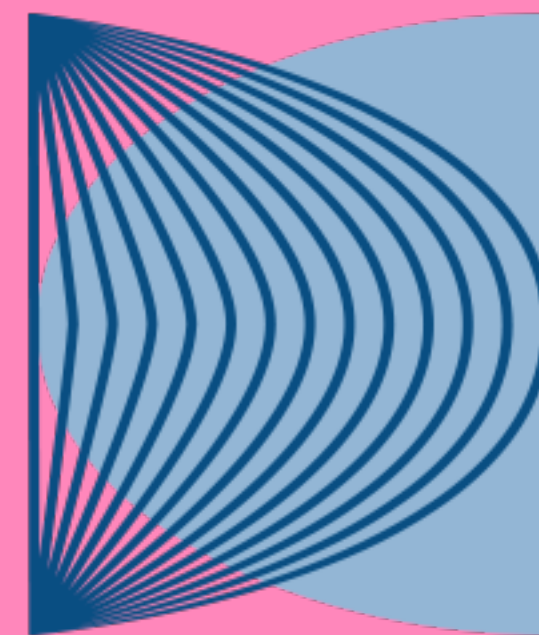


The appropriate degree of privacy, as also judged by society, is a challenge in a digital environment. For CBDC, the appropriate degree of privacy of the currency would need to be considered carefully, which could entail difficult public policy design choices for a central bank.



**BIS**

**Privacy: The digital dollar will support a balance between individual privacy rights and necessary compliance and regulatory processes, decided upon by policymakers and ultimately reflecting the jurisprudence around the Fourth Amendment**



*THE*  
**DIGITAL DOLLAR**  
*PROJECT*

Canadians are concerned about maintaining an appropriate degree of privacy both in relation to private businesses, such as merchants and payment providers, and in relation to the government... How much privacy should be available, and from whom, is an important public policy issue.



BANK OF CANADA  
BANQUE DU CANADA

Can read

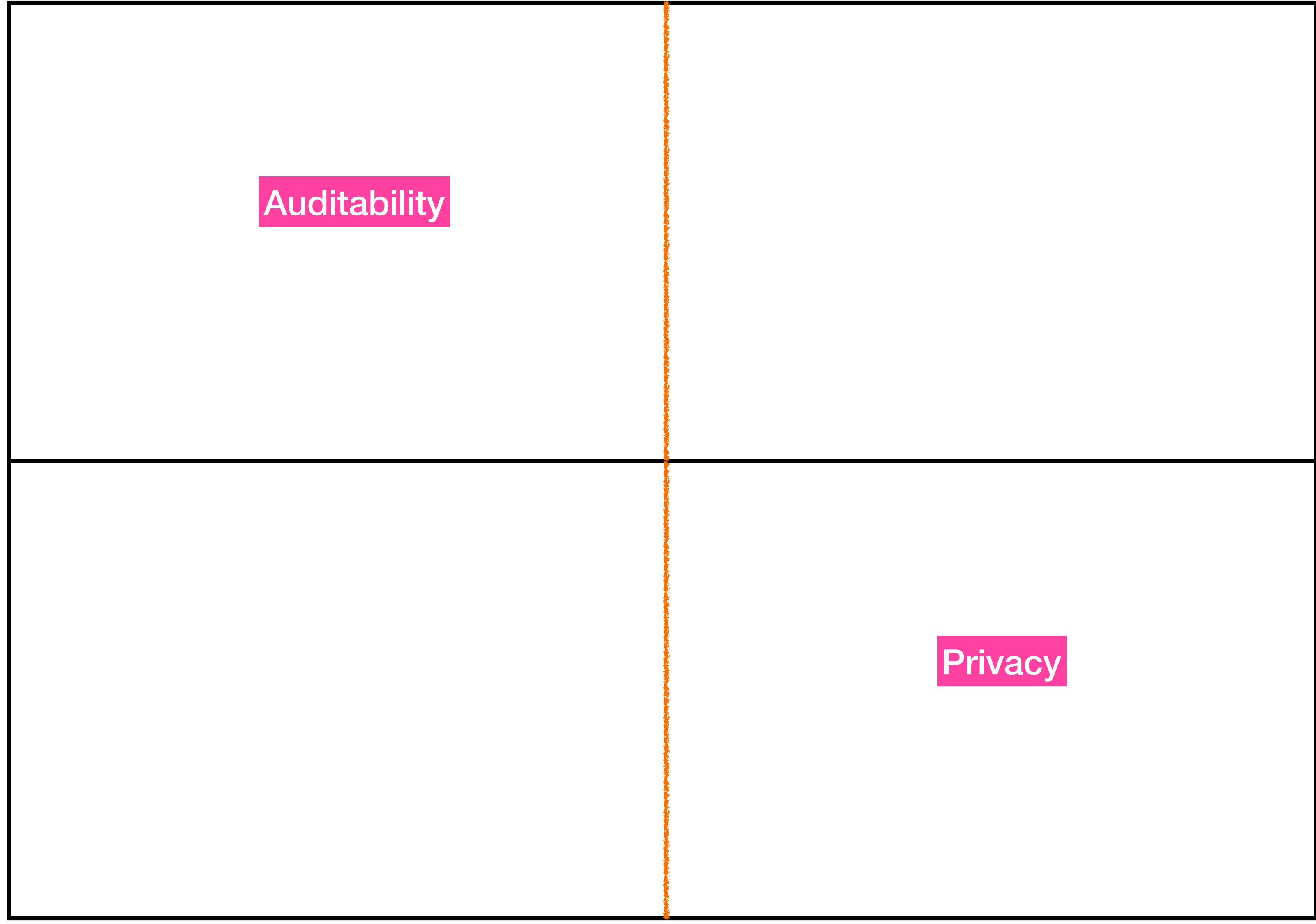
Cannot read

Authorized

Auditability

Not authorized

Privacy



Can read

Cannot read

Authorized

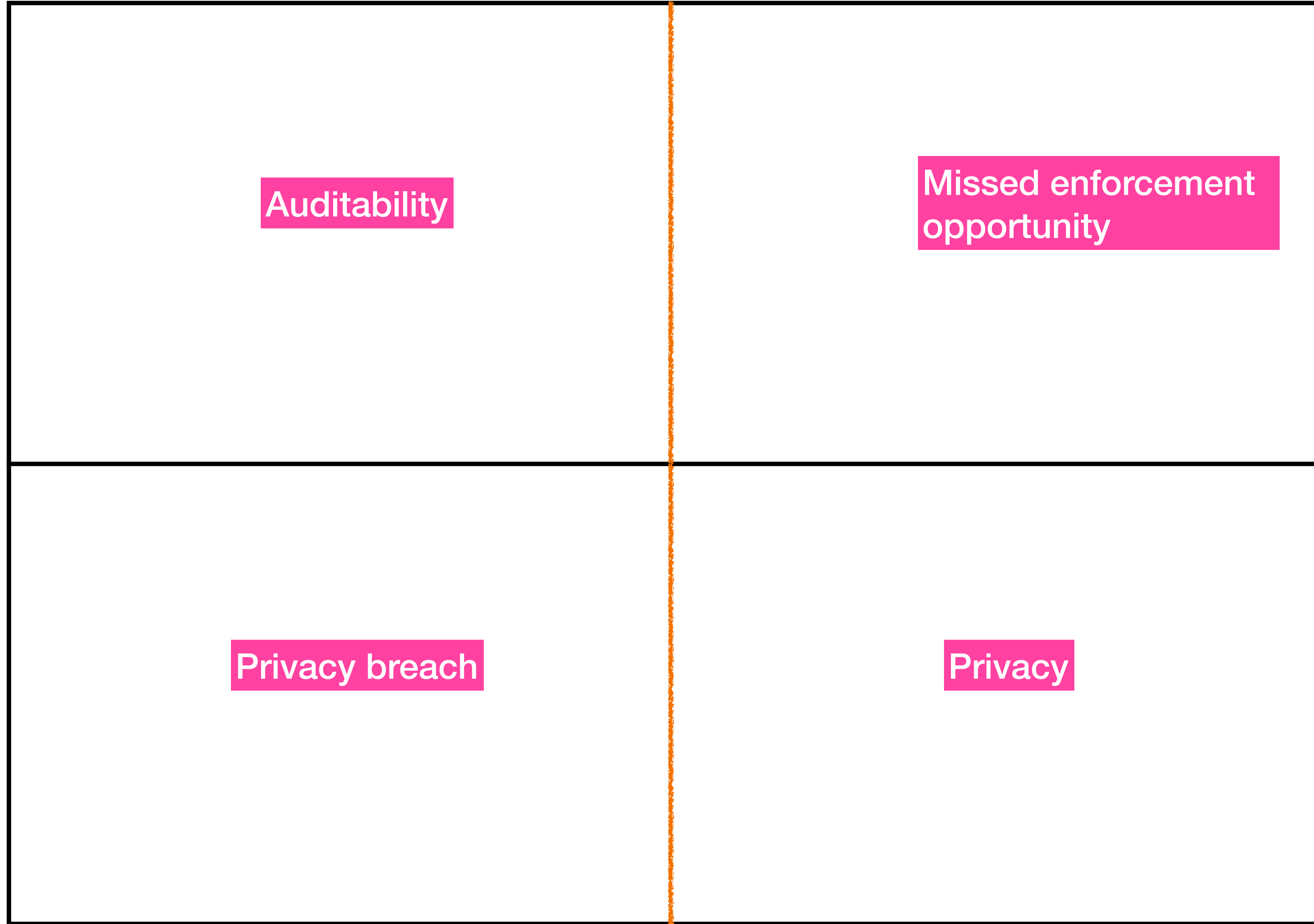
Auditability

Missed enforcement  
opportunity

Not authorized

Privacy breach

Privacy



Can read

Cannot read

Authorized

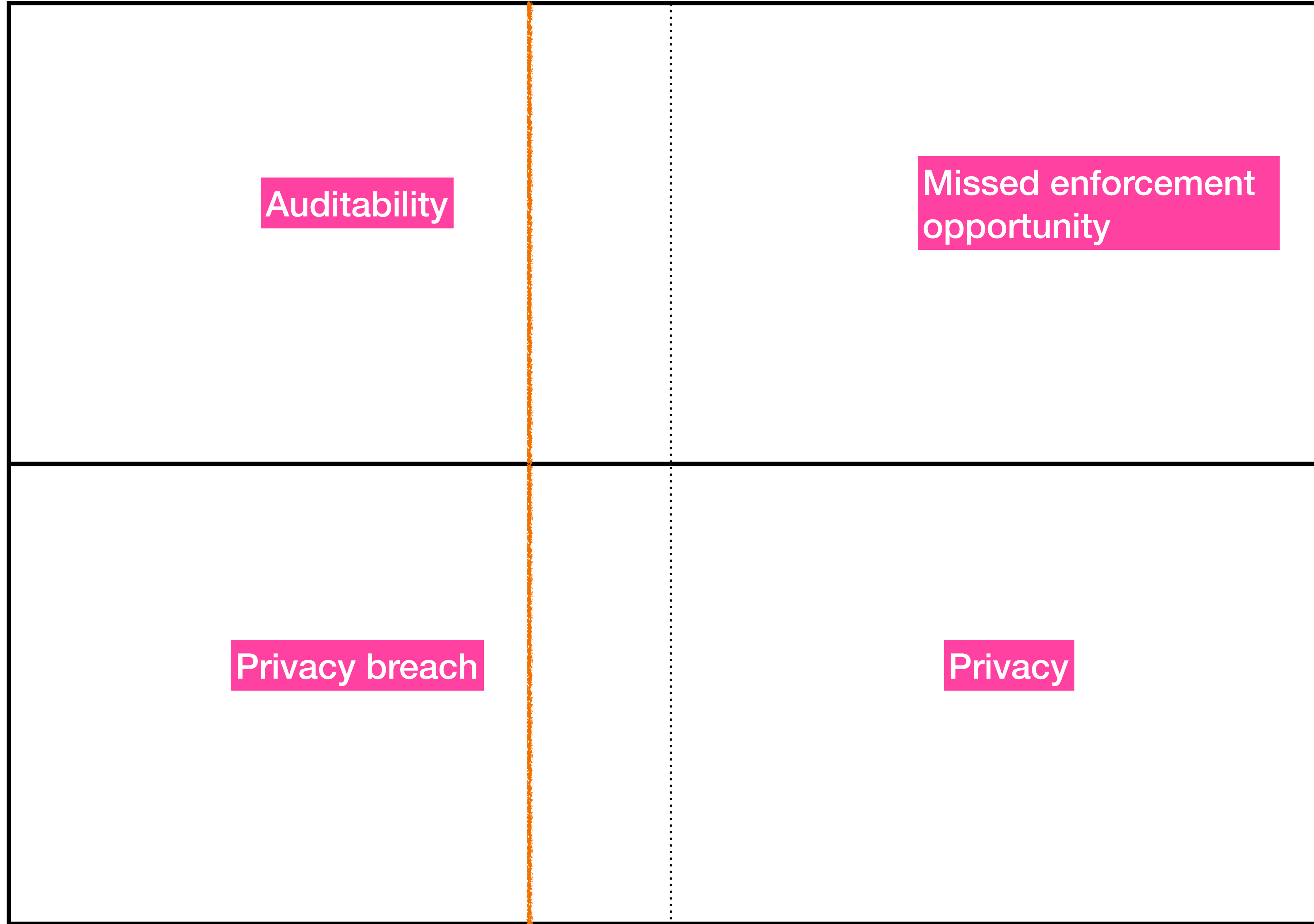
Auditability

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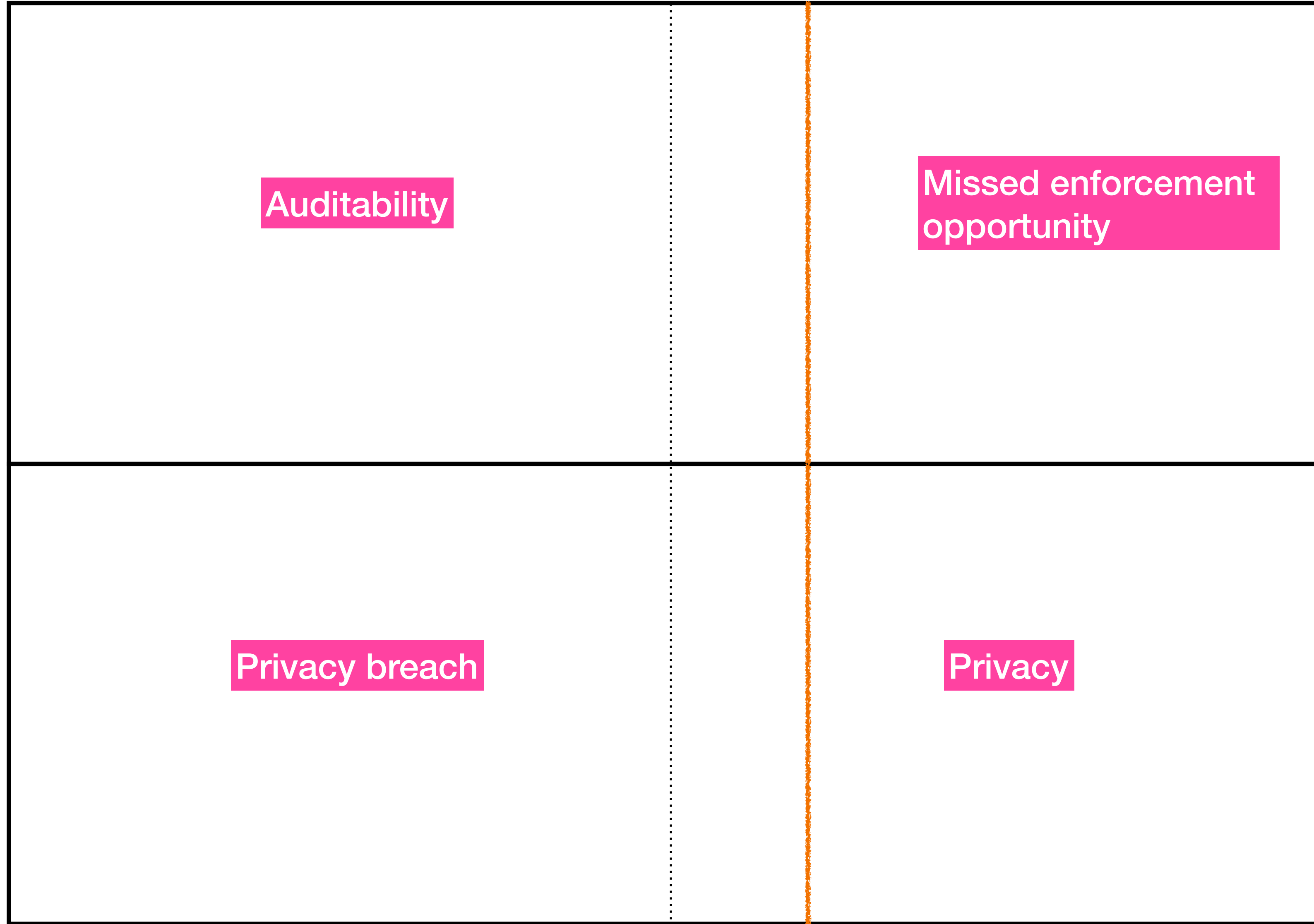
Auditability

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Privacy breach

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Can read

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Authorized

Auditability

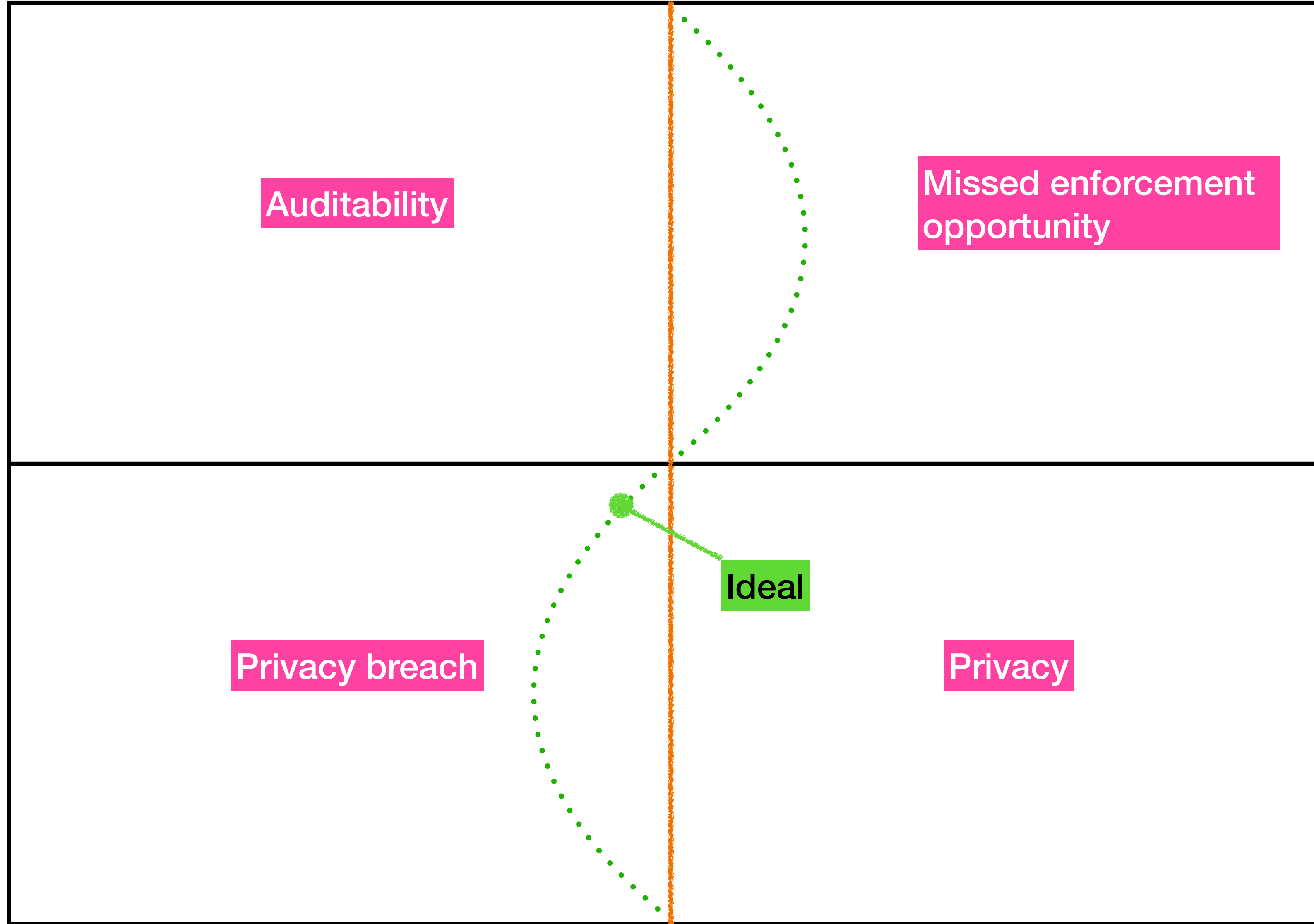
Missed enforcement opportunity

Not authorized

Privacy breach

Ideal

Privacy



## **Many Stakeholders**

- **Central Banks**
- **Established Commercial Banks**
- **Emergent Commercial Banks**
- **Payment Providers**
- **Enforcement: AML**
- **Enforcement: ATF (CFT)**
- **Enforcement: Financial Crimes**
- **Enforcement: Tax Avoidance**
- **Depository Insurance**
- **Federal Government**
- **Typical Residents/Citizens**
- **Vulnerable Residents/Citizens**
- **Unbanked**
- **Foreign nationals**
- **Tourists**
- **Investigative Journalists**

## **Key Stakeholders:**

- **Law enforcement: Prevent crime that involves payments**
- **Data holders: Commercial banks, payment processors and merchants**
- **Privacy enthusiasts: Typical users, regulators, privacy advocates**

- **Key conflicts:**

**Law enforcement**

**Data holders**

**Privacy enthusiasts**

- **Key conflicts:**

- **Law enforcement want to ensure someone can service their authorized requests for financial data, but are neutral on who**

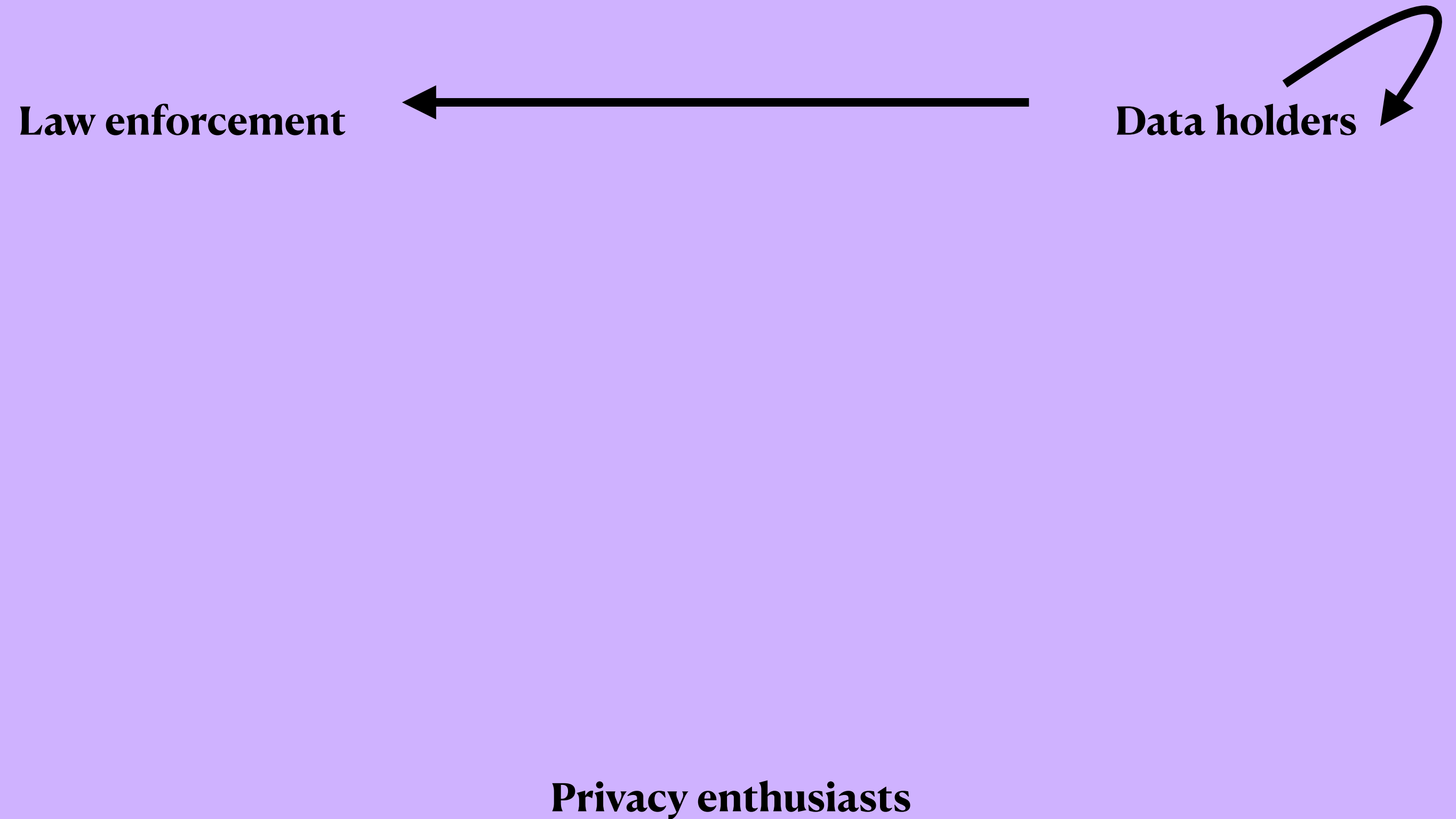
**Law enforcement**

**Data holders**

**Privacy enthusiasts**

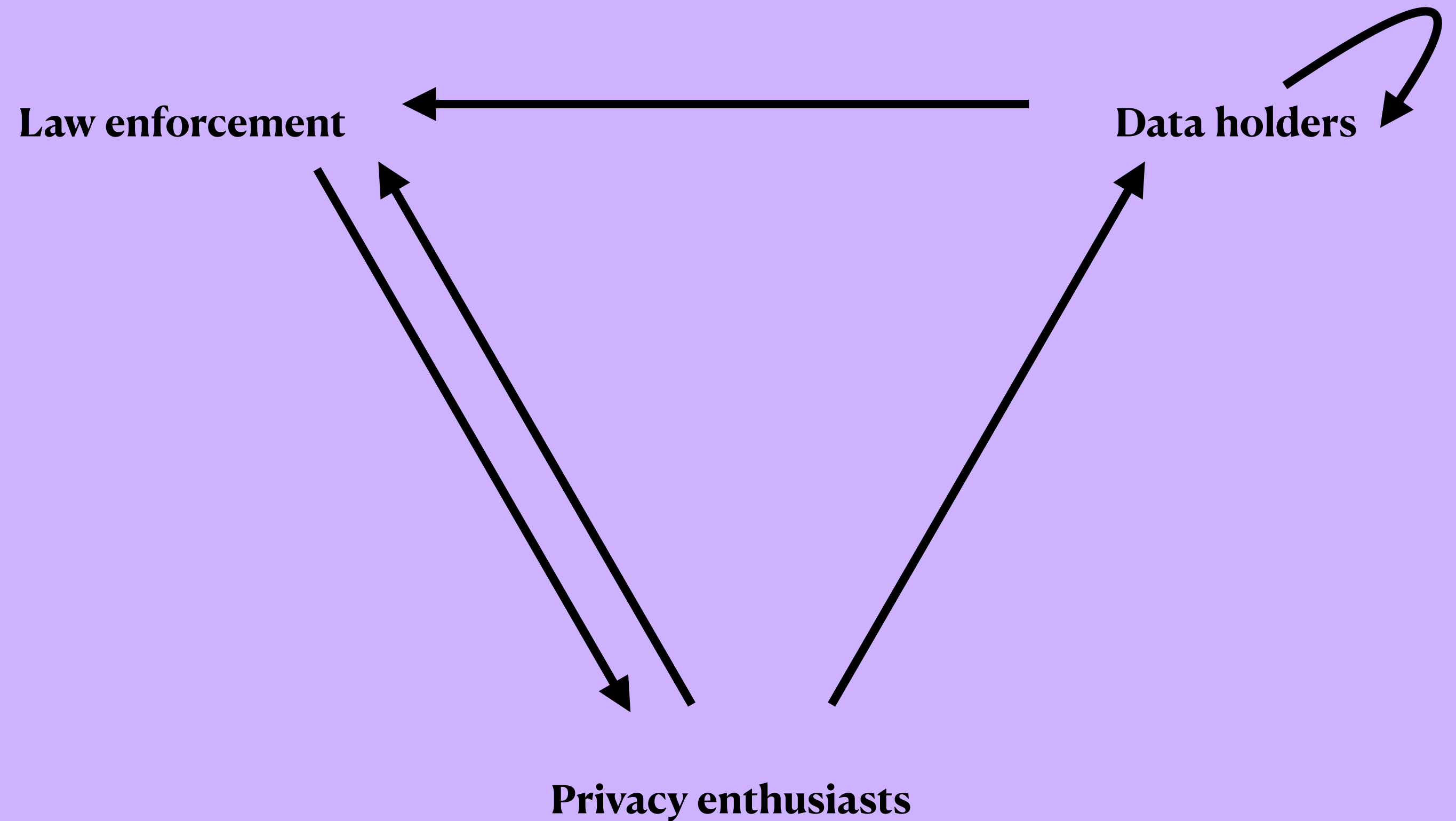
- **Key conflicts:**

- **Data holders wish to avoid the expense of servicing law enforcement and regulations**
- **Data holders have internal conflicts over the exclusivity of their financial data, which can be monetized**



- **Key conflicts:**

- **Privacy enthusiasts oppose indirect collection and monetization of their personal information**
- **Privacy enthusiasts support low crime rates but are concerned about law enforcement mistakes, corruptions and overreach**
- **Law enforcement is concerned with the impediments to investigations posed by privacy enhancing technologies**





	<u>L</u> aw enforcement	<u>P</u> rivacy enthusiasts		<u>D</u> ata holders	
	L → P	P → D	P → L	D → D	D → L
Cash	Ok				
Payment Network	Good				
Cryptocurrency	Ok/Bad				
Soft Privacy CBDC	Good				
Hard Privacy CBDC	Ok				

	<u>L</u> aw enforcement	<u>P</u> rivacy enthusiasts		<u>D</u> ata holders	
	L → P	P → D	P → L	D → D	D → L
Cash	Ok	Good			
Payment Network	Good	Bad			
Cryptocurrency	Ok/Bad	Good			
Soft Privacy CBDC	Good	Bad			
Hard Privacy CBDC	Ok	Ok			

	<u>L</u> aw enforcement	<u>P</u> rivacy enthusiasts		<u>D</u> ata holders	
	L → P	P → D	P → L	D → D	D → L
Cash	Ok	Good	Good		
Payment Network	Good	Bad	Bad		
Cryptocurrency	Ok/Bad	Good	Good		
Soft Privacy CBDC	Good	Bad	Ok		
Hard Privacy CBDC	Ok	Ok	Good		

	<u>L</u> aw enforcement	<u>P</u> rivacy enthusiasts		<u>D</u> ata holders	
	L → P	P → D	P → L	D → D	D → L
Cash	Ok	Good	Good	Good	
Payment Network	Good	Bad	Bad	Neutral	
Cryptocurrency	Ok/Bad	Good	Good	Good	
Soft Privacy CBDC	Good	Bad	Ok	Good/Bad	
Hard Privacy CBDC	Ok	Ok	Good	Good/Bad	

	<u>L</u> aw enforcement	<u>P</u> rivacy enthusiasts		<u>D</u> ata holders	
	L → P	P → D	P → L	D → D	D → L
Cash	Ok	Good	Good	Good	Neutral
Payment Network	Good	Bad	Bad	Neutral	Neutral
Cryptocurrency	Ok/Bad	Good	Good	Good	Neutral
Soft Privacy CBDC	Good	Bad	Ok	Good/Bad	Neutral
Hard Privacy CBDC	Ok	Ok	Good	Good/Bad	Bad

**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

**Hard Auditability**


**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

**Criminal  
Investigations**

**Suspicious  
Activity Reporting**

**Training Fraud  
Detection**

**Hard Auditability**


**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

Criminal Investigations

Suspicious Activity Reporting

Training Fraud Detection

**Hard Auditability**

Anonymity Budget

Sender Anonymity

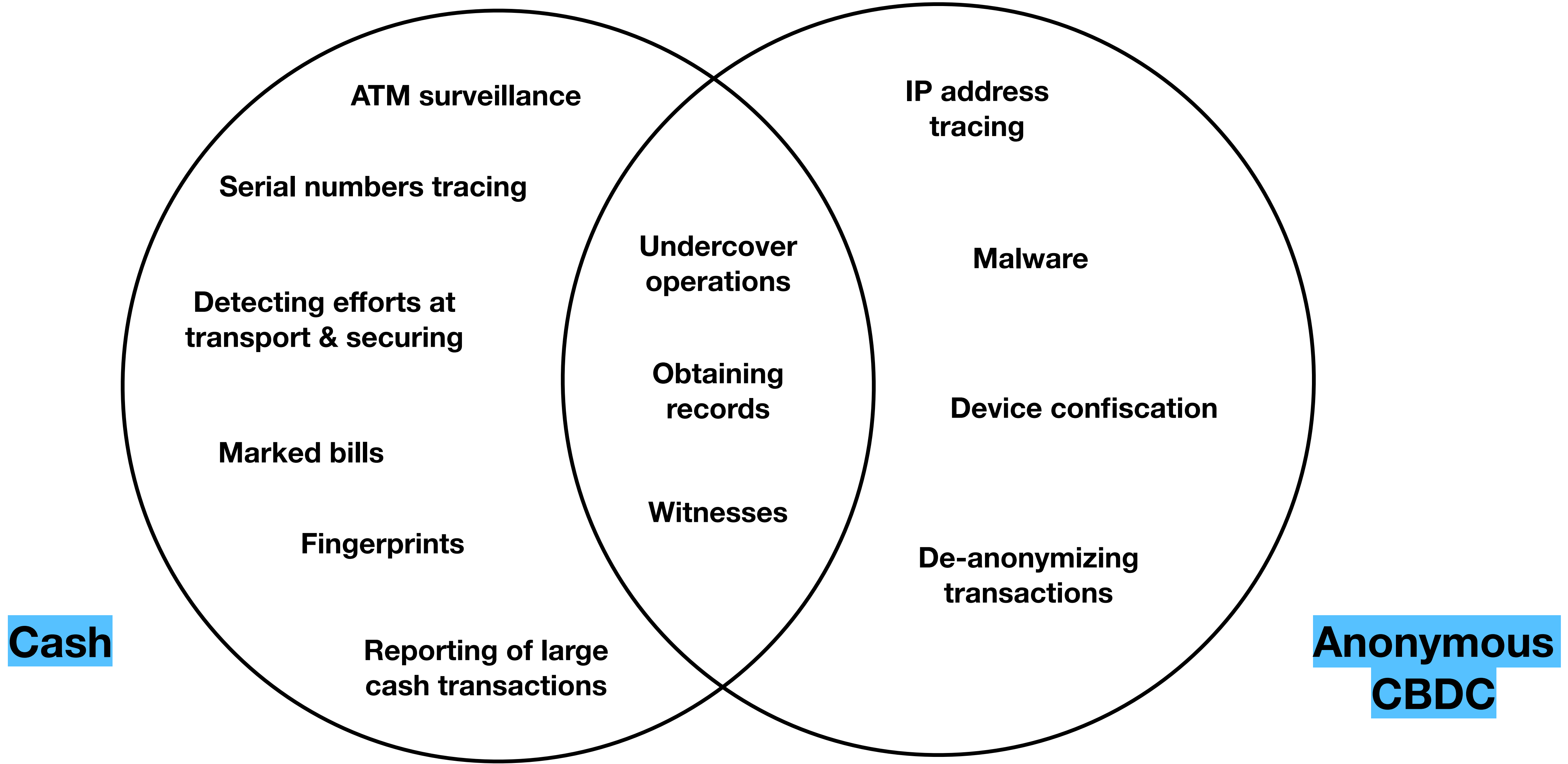
Anonymity Threshold

Full Anonymity

*Minimal Auditability*



# Possible Investigative Techniques



**Cash**

**Anonymous  
CBDC**

**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

Criminal Investigations

Suspicious Activity Reporting

Training Fraud Detection

**Hard Auditability**

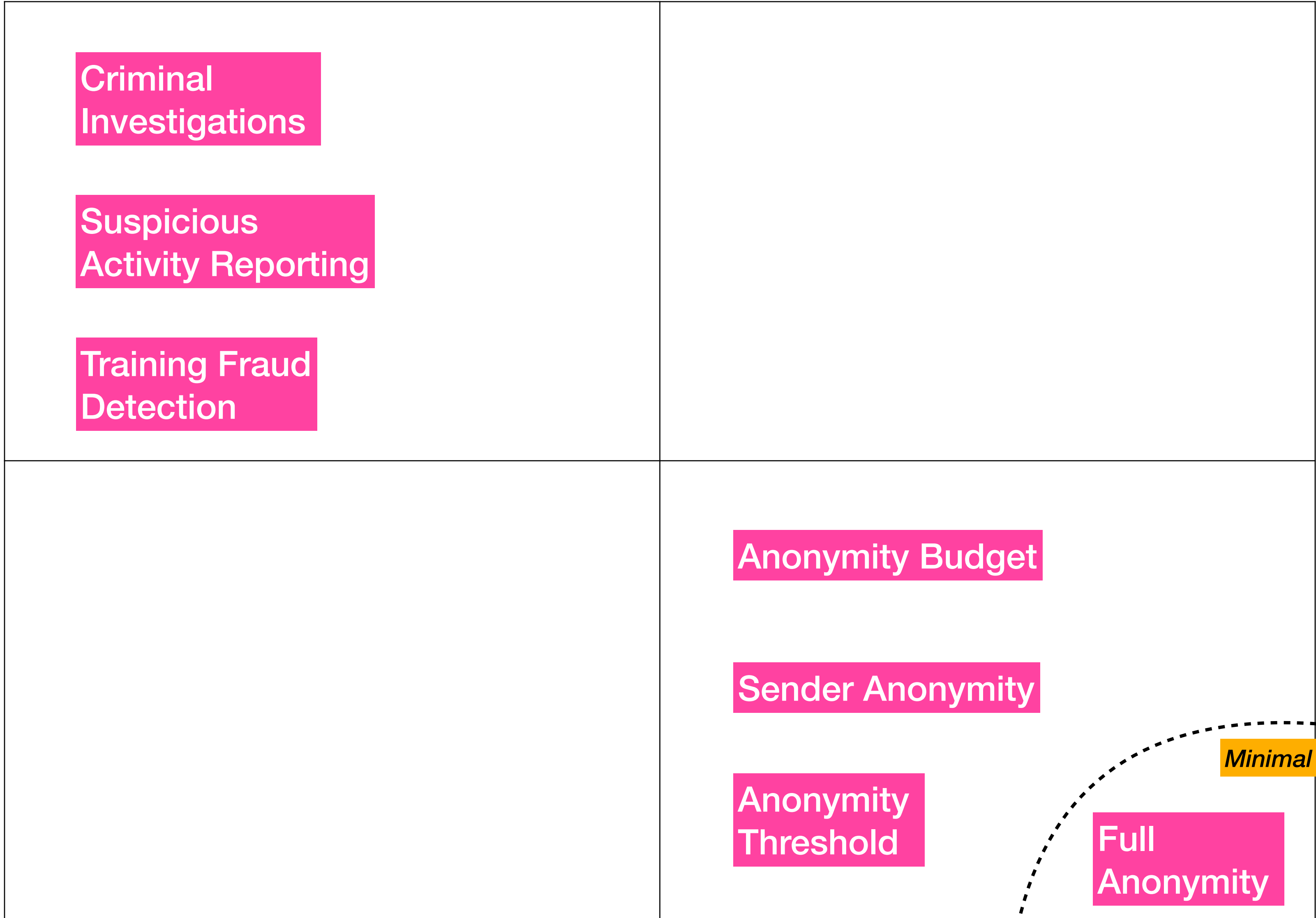
Anonymity Budget

Sender Anonymity

Anonymity Threshold

Full Anonymity

*Minimal Auditability*



**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

Criminal Investigations

Suspicious Activity Reporting

Training Fraud Detection

**Hard Auditability**

Fraud Prediction

Capital Controls

Sanctions List

Accredited Investor

Large Value Transactions

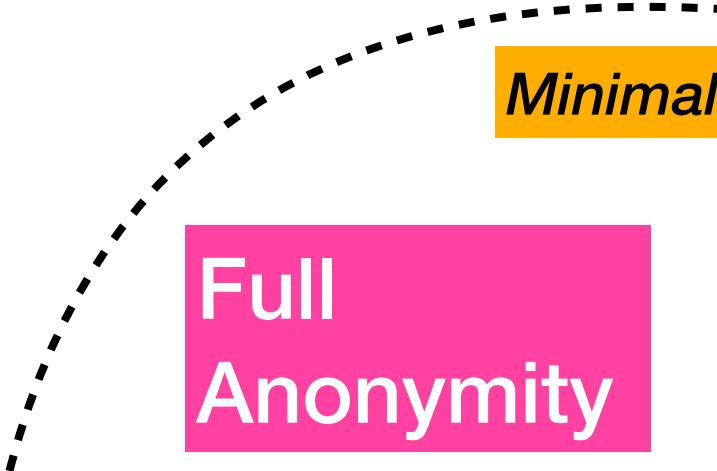
Anonymity Budget

Sender Anonymity

Anonymity Threshold

Full Anonymity

*Minimal Auditability*



**Soft Privacy**

**Hard Privacy**

**Soft Auditability**

Criminal Investigations

Suspicious Activity Reporting

Training Fraud Detection

**Ideal System (Elusive)**

**Hard Auditability**

Fraud Prediction

Capital Controls

Sanctions List

Accredited Investor

Large Value Transactions

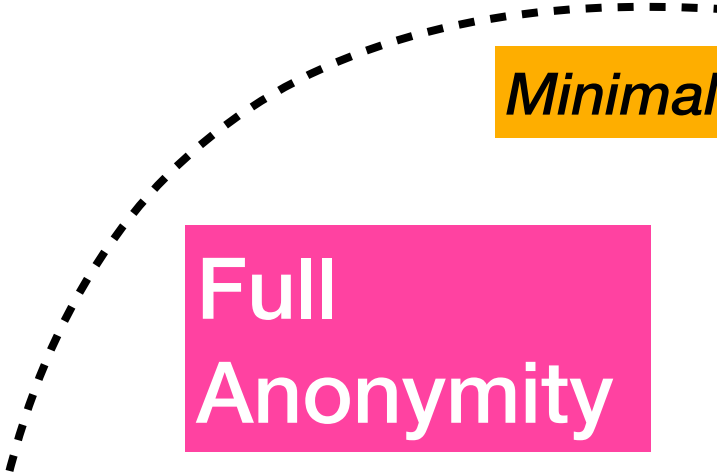
Anonymity Budget

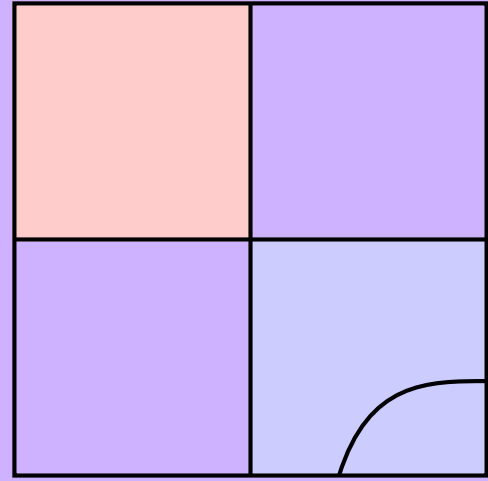
Sender Anonymity

Anonymity Threshold

Full Anonymity

*Minimal Auditability*





*Privacy type*

*Example*

Money laundering  
 Hiding insolvency  
 Tax evasion  
 Asset smuggling  
 Terrorist financing  
 Bribery  
 Embezzlement  
 Extortion  
 Robbery  
 Fugitive hunt

**Soft privacy & soft auditability**

Electronic retail

● ● ● ● ● ● ● ● ● ● ● ●

**Hard privacy & hard auditability**

Full anonymity

zcash

Privacy for payers

GNU Taler

● ● ● ● ●

Privacy for payees

Stealth address

●

Privacy threshold

PRCash

● ● ● ● ● ● ●

Privacy budget

UTT

● ● ● ● ● ● ● ● ● ● ●

Privacy w/ aggregate disclosure

zkLedger

● ● ● ● ● ● ●

Privacy with alibi

Monero

○ ○ ○ ○ ○ ○ ○ ○ ○ ○ ○

## **THREAT ACTORS**

**D: (FOREIGN) INTELLIGENCE AGENCIES**

**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: PAYMENT PROCESSORS & BANKS**



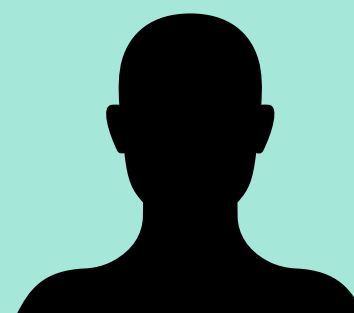
**THREAT ACTORS**

**D: (FOREIGN) INTELLIGENCE AGENCIES**

**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: PAYMENT PROCESSORS & BANKS**



**CASH**

**D**

**D**

**C**

**C**

**B**

**B**

**A**

**A**

**Shadow Economy**

**Unbanked**

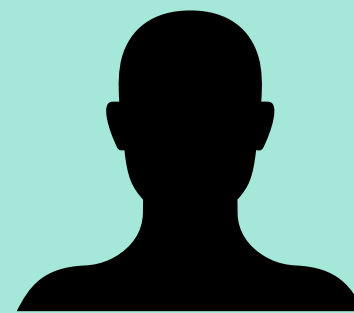
**THREAT ACTORS**

**D: (FOREIGN) INTELLIGENCE AGENCIES**

**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: PAYMENT PROCESSORS & BANKS**



**CBDC**

**D**

**D**

**C**

**C**

**B**

**B**

**A**

**A**

**Corrupt Gov't**

**Accountable Government**



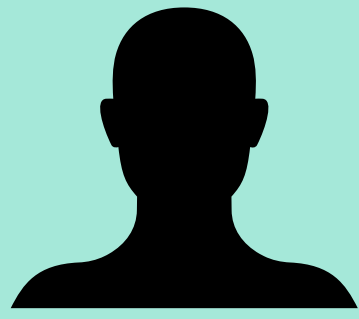
**THREAT ACTORS**

**D: (FOREIGN) INTELLIGENCE AGENCIES**

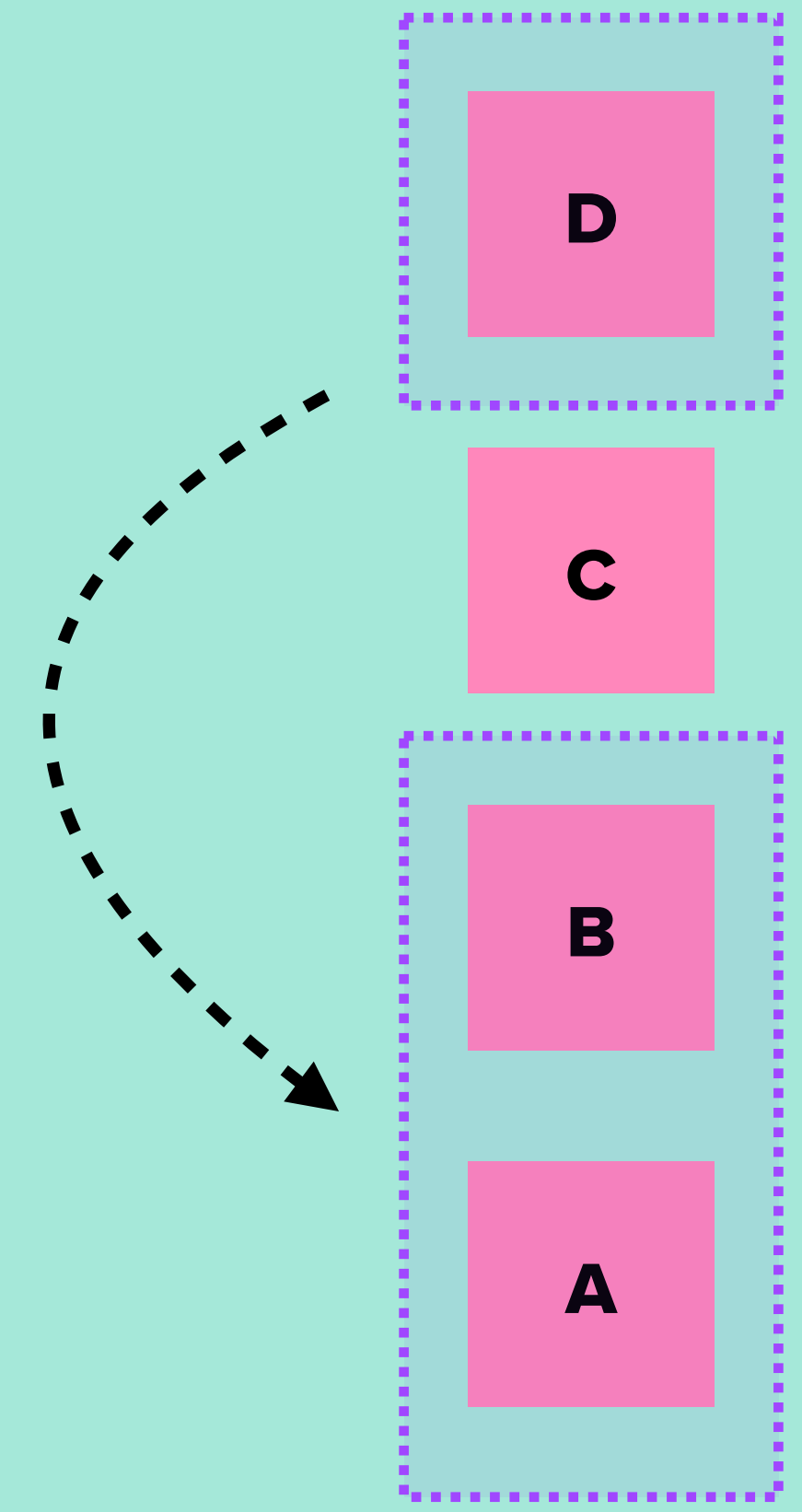
**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: PAYMENT PROCESSORS & BANKS**



**DATA**



**Undermines**

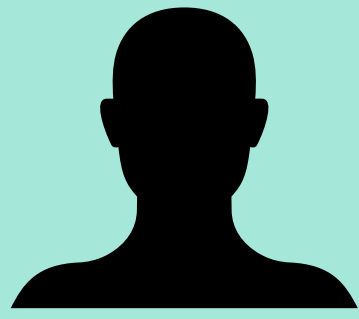
**THREAT ACTORS**

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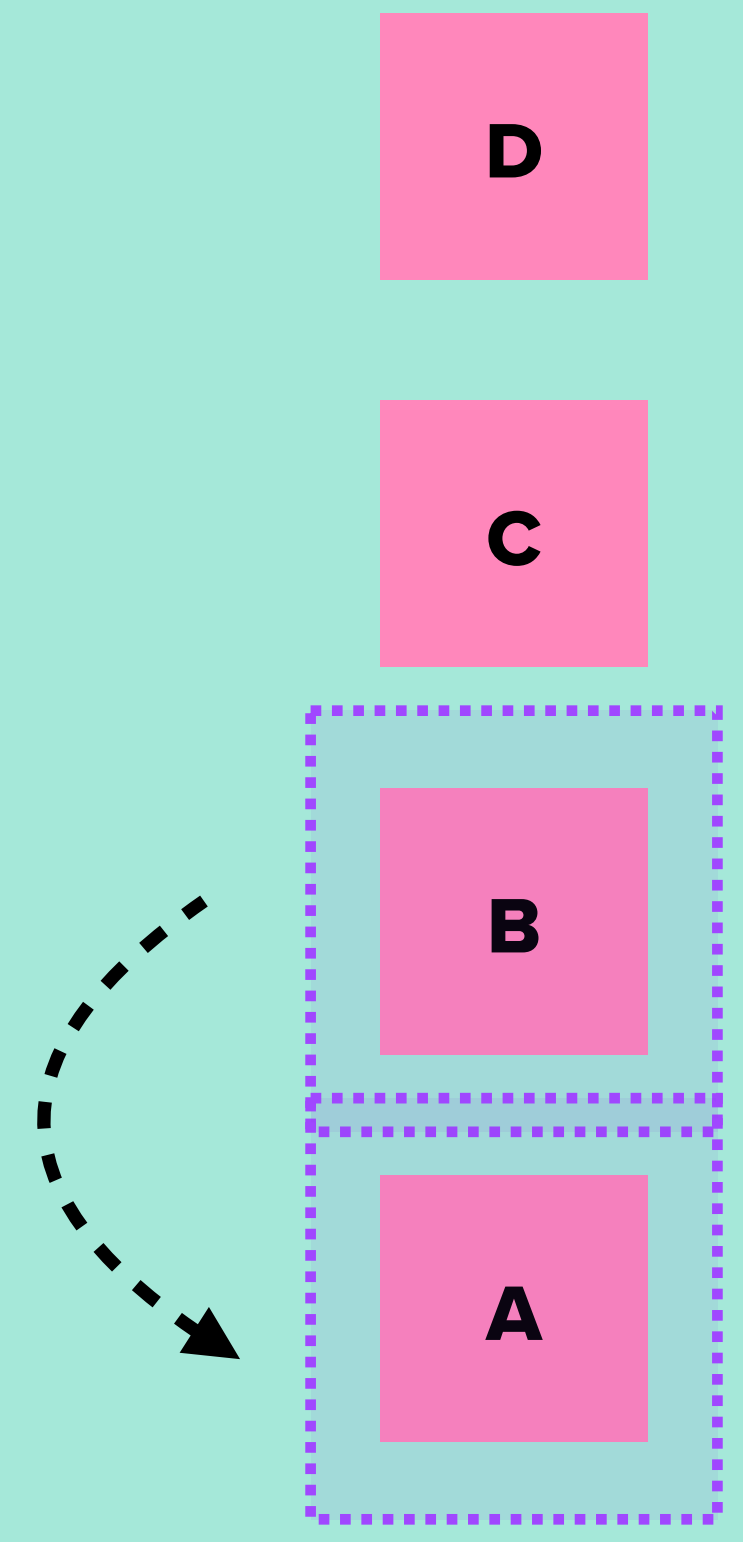
**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: PAYMENT PROCESSORS & BANKS**



**DATA**



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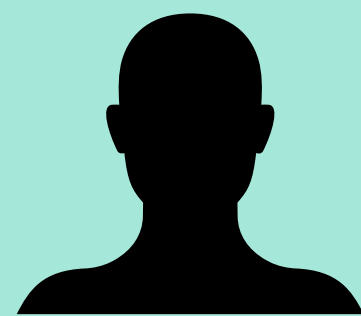
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**DATA**

**D**

**Hard Privacy** 

**C**

**Soft Privacy** 

**B**

**Hard Privacy** 

**A**

**Hard Privacy** 

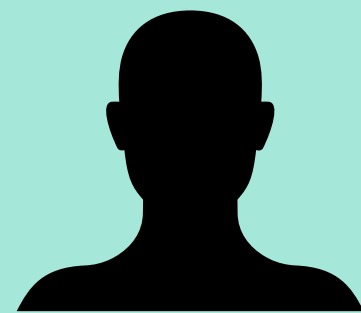
**THREAT ACTORS**

**D: (FOREIGN) INTELLIGENCE AGENCIES**

**C: LAW ENFORCEMENT**

**B: MERCHANTS & DATA INDUSTRY**

**A: CENTRAL BANK**



**DATA**

**D**

**Hard Privacy** 

**C**

**Soft Privacy** 

**B**

**Hard Privacy** 

**A**

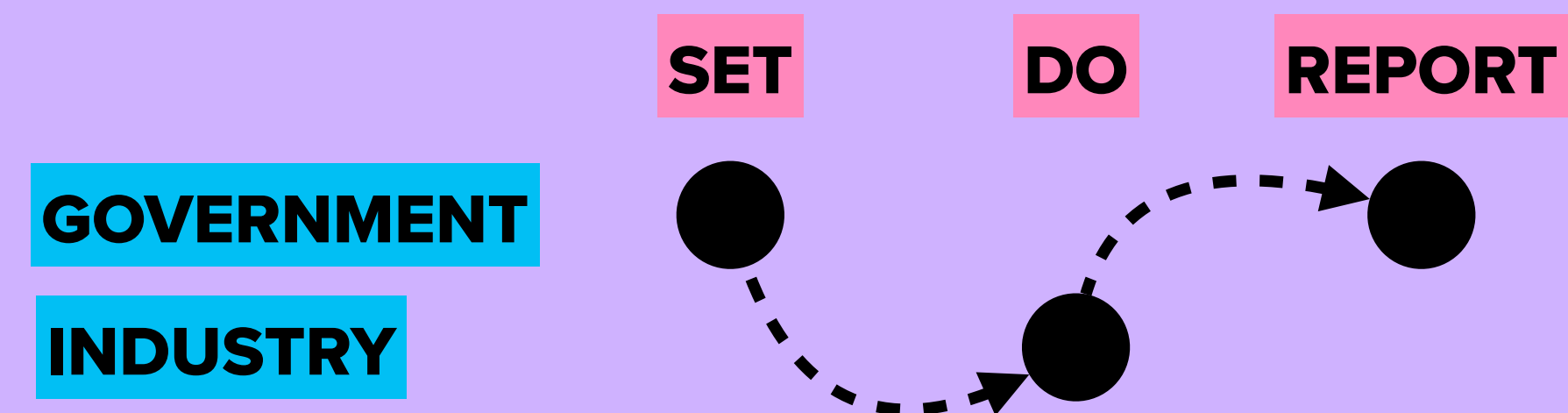
~~**Hard Privacy**~~ 

**Soft Privacy** 

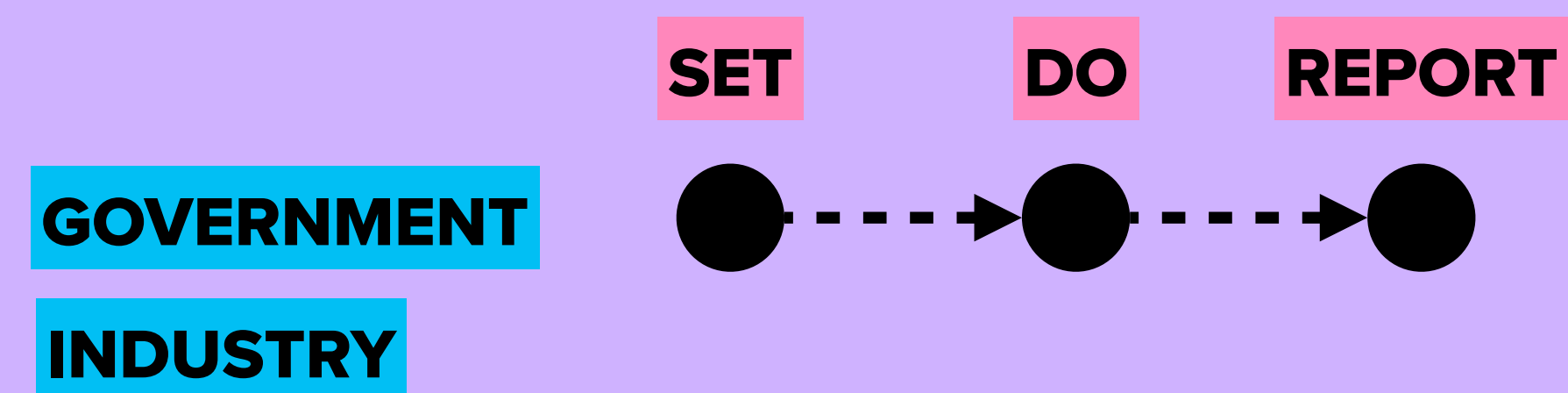
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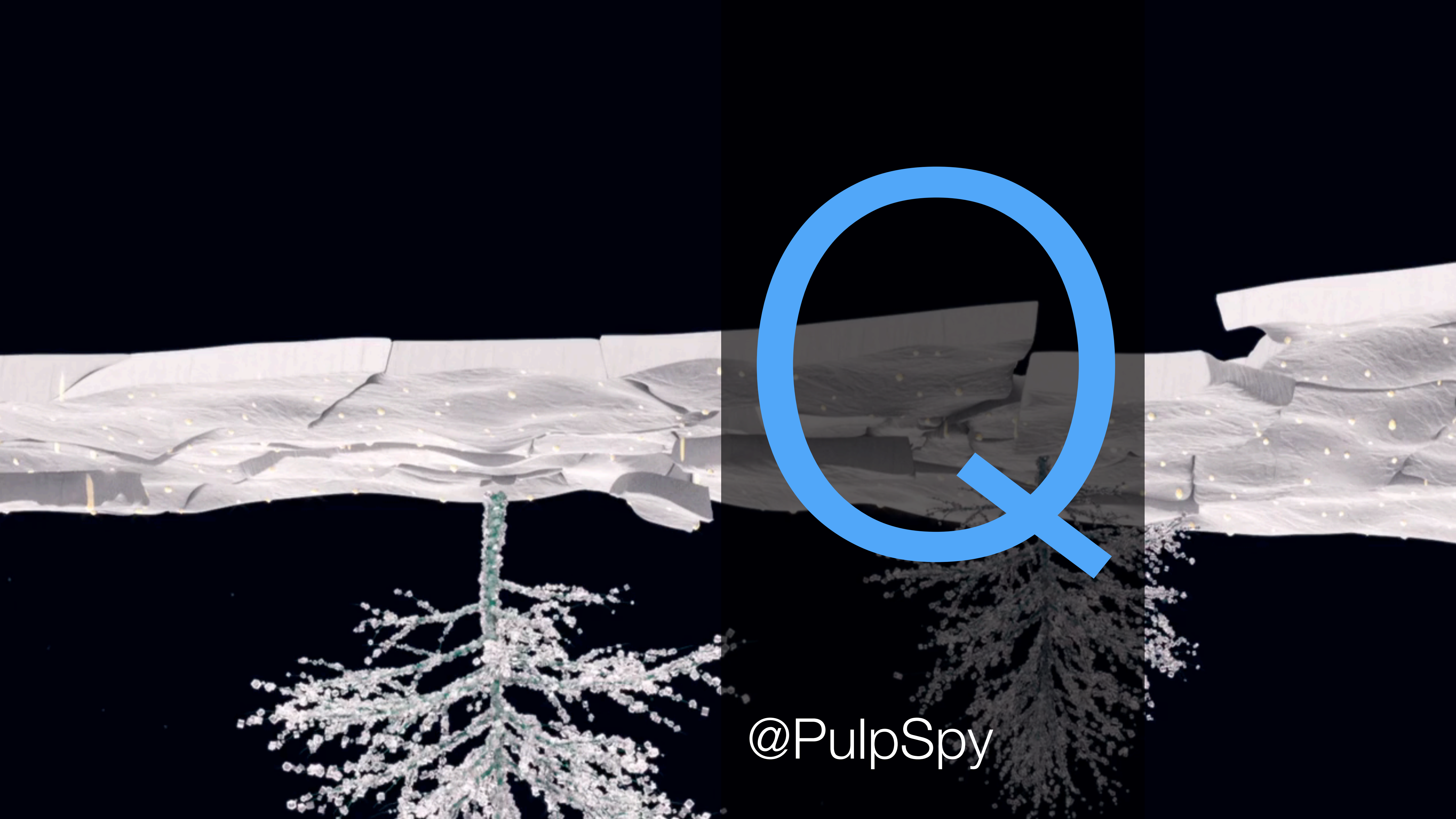
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- **Arguments from a privacy perspective against a direct CBDC:**
  - **Less consumer choice**
  - **Corruption within government**



@PulpSpy