

## **Privacy's "Identity" Crisis: Regulatory Strategies in the Age of De-Identification**

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Privacy regulation raises questions in various contexts and dimensions. Alongside the questions of substance, privacy regulation raises questions concerning the strategy and actual way these rights are to be regulated and enforced. This Article addresses the conundrum of privacy regulation strategy in Israel, while focusing on the innovative context of data transfers of personal data from public entities which apply de-identification and anonymization techniques. De-identification is a technological and administrative process which strives to transform protected personal information into one that is detached from any characteristic. However, there is a growing concern of successful re-identification attacks which will lead to the exposure of personal data.

Nations worldwide have already considered and even drawn out an overall strategy for de-identification. Yet Israel has thus far failed to do so. The Article demonstrates that Israel has seen the emergence of several separate and parallel de-identification regimes. Central examples of these regimes are those run by the Ministry of Health, the Central Bureau of Statistics and the Government's ICT Authority, as well as the way the laws are interpreted by the courts and applied by Israel's data protection authority. This Article presents and critically analyzes the development of regulatory strategies in this context.