



EUROPEAN DATA PROTECTION SUPERVISOR

USE OF VIDEO CONFERENCING SOFTWARE: CISCO WEBEX

DATA PROTECTION NOTICE

This processing operation refers to the use of Cisco Webex (“WebEx”) video conferencing tool by the European Data Protection Supervisor (EDPS) while carrying out its activities (such as for example, when organising meetings or conferences (“events”). WebEx is part of the unified communication tools provided to the EDPS by the European Parliament (“EP”).

Personal data is processed in accordance with [Regulation \(EU\) 2018/1725](#) (hereinafter ‘the Regulation’).

We provide this information based on Articles 15 and 16 of the Regulation.

Who is the controller?

The EDPS and the EP are **separate controllers** for this processing activity.

In accordance with the [EP Data Protection Statement](#), ‘*The Individual Equipment and Logistics Unit (EQUILOG Unit) is not controller for business processing operations on the usage of video/audio/chat services by EP’s entities and client EUIs’ entities, acting as controllers for the use of video/audio/chat services (i.e. using video/audio/chat services for their own business purposes). These entities are responsible for the business processing of data in video/audio/chat conferences organized on the provisioned services (included choices on the use of features of the services, such as meeting recording).*’

The **European Data Protection Supervisor (EDPS)**.

The EDPS is controller regarding the business processing of personal data when using WebEx for the events it organises (this includes business choices made on the use of the features of video conferencing tool, such as meeting recording).

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Email: edps@edps.europa.eu

Responsible department or role: the **Secretary-General**

Contact form for enquiries on processing of personal data to be preferably used:
<https://edps.europa.eu/node/759>.

For more information on the EDPS please consult our website: <https://edps.europa.eu>.

EP

DG ITEC - Individual Equipment & Logistics Unit (EQUILOG), ITEC-DPO-
EQUILOG@europarl.europa.eu

You can find the EP Data Protection Statement [here](#) (<https://www.europarl.europa.eu/data-protect/reportPdf/printPrivacyStatement.do;jsessionid=0CC8F364B5DD0BDB79943F458451A72B?prefix=V3&nr=570>) and the record of processing activity [here](#).

Contact for enquiries: EP DPO - <http://www.europarl.europa.eu/at-your-service/en/stay-informed/data-protection>

EP-DG ITEC is controller regarding the technical and legal aspects that it decides upon, such as for example the contractual clauses concluded with Cisco, as well as regarding technical customisation done at ITEC level and over which EDPS does not have any control or the possibility to alter.

Who is the processor?

The service provider/processor for the EP is: Cisco International Limited UK.

What personal data do we process and who has access to this personal data?

The categories of personal data processed depend on:

- the type event organised (public or internal),
- the data subjects involved (e.g. staff or external participants) and
- the customisation chosen by the event organiser for the specific event organised.

As controller regarding the business processing of personal data when using WebEx for the events it organises, the EDPS implements certain safeguards, depending on the type of event organised. As such, they are mentioned in the specific event's data protection notice. For example, participants could be informed that they can switch off their microphone and camera and/or use initials or other pseudonyms instead of full name (for example, during a public event). Also, as a rule, chat is deleted after event (if retained, it is anonymised); recording takes place only when needed (in that case, participants are informed in advance and provided with information on safeguards).

In accordance with the [EP Data Protection Statement](#), the following categories of personal data are processed:

- **Processing real-time meeting data:** such as VoIP, video and high frame rate sharing data [transient processing] (for Media Node processing: to provide the real time processing)
- **Host and Usage Information:** such as IP address, user agent identifier, hardware type, meeting session information.
- **Registration information:** Account data (user name, email, profile settings).
 - **Internal participants** have accounts based on their personal data (name, e-mail) created for them by ITEC Service Desk staff, as part of their administrative IT account.

- **External participants** supply their information at time of logging in into the system with their desired name, potentially providing personal data, based on a shared link and code provided for a specific session.

The list of participants' names is available (as encoded by the participants) for each participant for the duration of the conference.

- **User Generated Information:** Meeting/call recordings, if applicable. This action should be announced to the participants prior to the recording.
- **Technical Support Contact (TAC) Support Information:** Contact information of ICT technical staff working on the provision of the services. The state of the EP WebEx instance is associated with the ICT technical staff contact information at support ticket creation.

The data are accessible on a strict need-to-know basis.

Where did we get your personal data?

Processing real-time meeting data, Host and Usage Information, User Generated Information are directly collected from the users when using WebEx services. Registration information for external participants are directly collected from them.

Registration information for internal participants are collected indirectly. The source of their personal data (account data) is the request made to the ITEC Service Desk for creating an administrative IT account.

Why do we process your personal data and under what legal basis?

Personal data are processed in order to provide web-based video and audio conferencing services in different formats via WebEx, offering the possibility to organise meetings with internal and/or external participants, meetings/presentations for a wide audience for events in a panel/audience format, training sessions and any other related formats that might be offered as part of the service.

The lawfulness is based on Article 5(1)(a) of the Regulation ("*processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body*"). In particular, the processing is necessary "*for the management and functioning*" of the EDPS (Recital 22 of the Regulation).

The legal basis is Article 52(1) of the Regulation establishing the EDPS.

Participation to certain events organised by the EDPS (e.g. public events, such as conferences) is based on participants' consent (Article 5(1)(d) of the Regulation).

How long do we keep your personal data?

For all **registered end-users**:

- **Registration information:** while the account is active (for provision of service); name and unique user ID is maintained for 7 years from termination by default for audit requirements.
- **User Generated Information:** while the account is active (for provision of service); deleted within 60 days following termination of service.

- **Host and Usage Information:** while the account is active (for provision of service); maintained for 3 years following termination of service in pseudo anonymized form in order to maintain record of service delivery.

For **all participants (end-users):**

- **Processing real-time meeting data:** The content of the video/audio conference (documents, links, files, etc.) is deleted after the termination of the session, unless they are downloaded/saved by the meeting organiser or a specific recording of the meeting takes place. Chat messages exchanged among participants during a meeting are deleted after the meeting/session is ended/terminated.

For **ICT technical staff** working on the provision of the services:

- **TAC Support Information** (i.e. contact information): is kept for up to 10 years (referring to the duration of keeping the support ticket).

Are there any transfers of personal data outside of the EU/EEA to countries for which there is no adequacy decision by the European Commission?

Transfers of personal data outside of the EU/EEA occur only in the following situations:

- **For media node processing to provide the real time audio/video/chat processing:** [Based on host or attendee location: Cisco and/or its affiliates contracted to provide data center services in: (Brazil), (Australia), (Singapore)]; Processing real-time meeting data such as VoIP, video and high frame rate sharing data (transient processing).
- **For Technical Support Assistance:** data storage Aricent (India), Estarta (Jordan), Sykes (Costa Rica and Colombia), Concentrix (US) for support provision: TAC Support Information.

The legal basis (transfer tool) for transfers to countries outside of EU and EEA for which there is no adequacy decision by the European Commission is the Standard Contractual Clauses for international transfers, with supplementary measures implemented, as described in Article 11 of the EP-Cisco SELA in conjunction with Annex 3e.

What are your rights regarding your personal data?

You have the right to request access to your personal data and to relevant information concerning how we use it. You have the right to request rectification of your personal data. You have the right to ask for the erasure of your personal data or to restrict its processing. You have the right to object to the processing of your personal data, on grounds relating to your particular situation, at any time. We will consider your request, take a decision and communicate it to you.

We will consider your request, take a decision and communicate it to you. The time limit for treating your request is one (1) month. This period may be extended by two (2) further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPS will inform you of the extension within one (1) month of receipt of your request and will provide reasons for the delay.

You can send your request to the EDPS electronically or by post (see section on contact

details below).

Automated decision-making

Your personal data is not subject to automated decision-making.

You have the right to lodge a complaint

If you have any remarks or complaints regarding the way EDPS processes your personal data, we invite you to contact the responsible department or role or the EDPS DPO (see section on contact details on the first page and below).

You have, in any case, the right to lodge a complaint with the EDPS as a supervisory authority: https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en.

Contact details for enquiries regarding your personal data

We encourage you to contact us using the EDPS contact form, selecting 'My personal data' as the relevant subject: <https://edps.europa.eu/node/759>.

If you wish to contact the EDPS DPO personally, you can send an e-mail to DPO@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO.

EDPS postal address: European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

You can also find contact information on the EDPS website: https://edps.europa.eu/about-edps/contact_en.