

EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
		<i>Use of video conferencing software: Cisco Webex</i>
1.	Last update of this record	13.10.2023
2.	Reference number	58
3.	Name and contact details of controller	The EDPS and the EP are separate controllers for this processing activity. The European Data Protection Supervisor (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). Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu Responsible department or role: Secretary-General (EDPS@edps.europa.eu) Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759.

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		The European Parliament (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. In accordance with the EP Data Protection Statement, ‘<i>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).</i>’ European Parliament 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 here. Contact for enquiries: EP DPO - http://www.europarl.europa.eu/at-your-service/en/stay-informed/data-protection
4.	Name and contact details of DPO	EDPS DPO: dpo@edps.europa.eu EP DPO - http://www.europarl.europa.eu/at-your-service/en/stay-informed/data-protection
5.	Name and contact details of joint controller (where applicable)	n/a

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6.	Name and contact details of processor (where applicable)	The service provider/processor for the EP is: Cisco International Limited UK.
7.	Short description and purpose of the processing	This processing operation refers to the use of a video conferencing tool, namely Cisco Webex (“Webex”) by the 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 EP on the basis of the Service Level Agreement between the EDPS and EP. 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.
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<u>Categories of persons</u> EDPS staff and/or external participants to an event organised by the EDPS. <u>Categories of personal data processed</u> 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,

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		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. Processing of the following categories of personal data: - registration information, - host and usage information, - user-generated information takes place by using data centers located in Germany and the Netherlands.

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9.	Time limit for keeping the 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 organizer 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).
10.	Recipients of the data	Transfers necessary for the provision of the services: Cisco International Limited UK with data centers in the EU.
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with	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.



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	which safeguards?	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.
12.	General description of security measures, where possible.	- Information security measures implemented by the EP. - Information security measures implemented by CISCO in accordance with the contractual clauses concluded between the EP and Cisco. - EDPS staff have access to personal data processed via Webex on the basis of a strict need to know principle.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	DPN published on the EDPS intranet and internet [https://edps.europa.eu/data-protection/our-work/publications/data-protection-notice/use-video-conferencing-software-cisco_en].