



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** Web Conference Service (WebEx)

**Data Controller:** DIGIT.C4

**Record reference:** DPR-EC-05006

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## **1. Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation Web Conference service (WebEx) undertaken by DIGIT.C4 is presented below.

## **2. Why and how do we process your personal data?**

Purpose of the processing operation: DIGIT.C4 collects and uses your personal information in order to:

- identify of Conference Host and participants to ensure the normal operation of the service
- identify potential improvements and technical deficiencies of the service
- collect statistics used for service invoicing by the contractor
- collect representative data and conference statistics (excluding content) to improve user experience and service performance by carrying out analyses of aggregated data
- address the technical support request
- analyse the performance of technical support

The organizer of a meeting is always a Commission member and when a meeting is organised including both internal or/and external participants a set of parameters need to be used (mainly the email address of each participant).

If a member of Commission staff would act as an organizer, he/she needs to create a personal account on the system.

During the video/audio/chat conference, all participants are able to share content on a voluntary basis and the meeting organizer owns the capacity to record the conference/meeting. This action should be announced to the regular participants prior the recording and this processing is under the responsibility of the video/audio conference organizer.

It is recommended to the video/audio conference organizer to create a separate privacy statement and share it with the participants before the video conference is initiated.

Your personal data will not be used for an automated decision-making including profiling.

## **3. On what legal ground(s) do we process your personal data**

We process your personal data, because:

- (a) 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.

According to Article 17 of the Treaty on European Union the EC “shall promote the general interest of the Union and take appropriate initiatives to that end. It shall ensure the application of the Treaties, and of measures adopted by the institutions pursuant to them. It shall oversee the application of Union law under the control of the Court of Justice of the European Union. It shall execute the budget and manage programs. It shall exercise coordinating, executive and management functions, as laid down in the Treaties[.....]”

In addition, this processing operation for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies.

More specifically, the objective of all processing activities related to WebEx is to support the management and the functioning of the European Commission, by adjusting the internal mechanisms and management systems to the new technological environment and advancements, by providing to EC Staff the necessary means and tools to perform their daily tasks and by organizing EC’s operations according to the principles of sound financial management. Article 33.1 (a)(b) and (c) of the Regulation 2018/1046 that refers to the performance and principles of economy, efficiency and effectiveness is also applicable here.

The use of WebEx web-conferencing services are also in line with the EC’s Digital Strategy 2018 for a modern and digital working environment, including unified communication with advanced video-conferencing. The deployment of WebEx is the implementation of the EC’s Action Plan. Part of the EC’s Digital Workplace Strategy is the replacement of the old telephony services with unified communication and collaboration tools, such as WebEx for non-Commission stakeholders.

This processing of personal data in the context of the WebEx Service is necessary to ensure the proper use and management of Commission resources for EC Staff to efficiently carrying out their duties by also enabling them communicate with non-EC stakeholders for work-related purposes. Therefore, it is necessary for ensuring that Commission staff have effective and cost efficient collaboration and communication tools at their disposal to enable them to carry out their duties.

#### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation DIGIT.C4 collects the following categories of personal data:

- Host and Usage Information
  - IP Address
  - User Agent Identifier
  - Hardware Type
  - Operating System Type and Version
  - Client Version
  - IP Addresses Along the Network Path
  - MAC Address of endpoint (as Applicable)
  - Service Version
  - Actions Taken
  - Meeting Session Information (title, date and time, frequency, average and actual duration, quantity, quality, network activity, and network connectivity)
  - Number of Meetings
  - Number of Screen-Sharing and Non- Screen-Sharing Sessions

- Number of Participants
  - Host Name
  - Screen Resolution
  - Join Method
  - Performance, Troubleshooting, and Diagnostics Information
- Invoicing information (subset of previous category)
  - Host Name
  - Conference URL
  - Conference Time and Duration
- Host Registration Information
  - Name/Surname
  - Email Address
  - Password (hashed version only)
  - Public IP Address
  - Browser
  - Phone Number (Optional)
  - Mailing Address (Optional)
  - Avatar (Optional)
  - Billing Information
- User-generated Information
  - Meeting and Call Recordings (only by Organizer) –optional data
  - Uploaded Files – optional data
- TAC Support Information
  - Name/Surname of the Employee Appointed to Open the Service Request
  - Email address of the Employee Appointed to Open the Service Request
  - Phone Number of the Employee Appointed to Open the Service Request
  - Authentication Information (excluding passwords)
  - Information About the Condition of the System (if applicable)
  - Registry Data About Software Installations and Hardware Configurations (if applicable)
  - Error-Tracking Files (if applicable)

The provision and collection of personal data is mandatory to meet a technical requirement. If you do not provide your personal data (Host Registration/Host Usage/User-generated), possible consequences might be that the system cannot operate properly and therefore, the participation of a user is impossible. On the other hand missing TAC Support Information might severely impact the efficient technical support the contractor could offer.

The User-generated information, namely the recording and files shared of the conference can be available in two ways:

- Through participation in the conference for its duration. In this case, participants may decide not to share their image or voice.
- By the recording of the conference, which may be activated manually by the organiser.

The chat exchange between participants is never retained after the conference.

The list of participants' names is available for each participant for the duration of the conference, but these names are not a unique identifier. Indeed, they may not correspond to the true names of people in the conference.

Furthermore, TAC support information does not constitute a source of personal data, since the request are created and managed by a Technical agent directly to the contractor, the end-user

does not even have access to the support centre. On the other hand, the lack of TAC support information could have a major impact on the effectiveness of the contractor technical assistance.

#### **5. How long do we keep your personal data?**

DIGIT.C4 keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, According to the following values:

- Host and Usage Information
  - 3 years from when the Service is terminated in a pseudonymised format.
- Invoicing information (subset of previous category)
  - 7 years maximum
- Host Registration Information
  - 7 years after contract termination
  - On User-request by sending a request to [privacy@cisco.com](mailto:privacy@cisco.com) or opening a TAC service request
- User-generated Information
  - Meeting duration (unless recording by the meeting host takes place)
- TAC Support Information
  - Up to 10 years
  - On User-request by sending a request to [privacy@cisco.com](mailto:privacy@cisco.com) or opening a TAC service request

The content of the video/audio conference (documents, links, files etc.) will be 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. In this scenario the recording will be announced only to the organizer, protected by a random password and deleted after 7 days.

Chat messages exchanged among participants during a meeting are deleted after the meeting/session is ended/terminated.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission and its contractors based on its service. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

The controller will transfer your personal data to the following recipients in a third country (UK and USA) in accordance with Regulation (EU) 2018/1725.

Category of Personal Data	Datacenter Location
Registration Information	Germany (AWS), The Netherlands, the United Kingdom

Host and Usage Information	Germany (AWS), The Netherlands, the United Kingdom
User-Generated Information	Germany (AWS), The Netherlands, the United Kingdom

The controller will transfer your personal data based on a procurement contract including the Standard Contractual Clauses (SCCs) among various data protection and security clauses. Supplementary measures have also been taken by both the controller and the processor (contractor). Back-up data processed outside the European Union and the European Economic Area, are also subject to the SCCs mechanism.

Regarding all transfers to the UK, the processor commits to engage in discussions in good faith with the controller in 2021 to re-evaluate the situation based on the updates on the UK-EU relationship after Brexit.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

#### **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The main recipient is the conference’s organizer who should invite all internal and/or external participants. The organizer, by service definition, is part of EC Staff. Participants are recipients as well, of all the contents of the meeting during the duration of the session. The main organizer can take the decision of meeting recording and in such scenario a recording alert is visible and available to all participants.

The Contractor is CISCO International Limited, 1 Callaghan Square Cardiff, CF10 5BT, United Kingdom and is a recipient for several sets of data (Host Registration/Host Usage) for the provision and operation of the service, for statistics, performance and billing purposes.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

#### **8. What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller ( [DIGIT-C4@ec.europa.eu](mailto:DIGIT-C4@ec.europa.eu))

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-05006.