

**RECORD OF PROCESSING ACTIVITY
ACCORDING TO ARTICLE 31 REGULATION 2018/1725¹
NOTIFICATION TO THE DATA PROTECTION OFFICER**

NAME OF PROCESSING OPERATION²: Cisco Webex Meetings

Reference number: DPR-2020-101
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Part 1 (Publicly available)

1) Controller(s)³ of data processing operation (Article 31.1(a))
<p>Controller: European Union Agency for Fundamental Rights (FRA) Schwarzenbergplatz 11, A-1040 Vienna, Austria Telephone: +43 1 580 30 – 0 Email: information@fra.europa.eu Organisational unit responsible⁴ for the processing activity: Corporate Services Contact details: contact@fra.europa.eu Data Protection Officer (DPO): dpo@fra.europa.eu</p>

2) Who is actually conducting the processing? (Article 31.1(a))⁵
<p>The data is processed by the FRA itself <input checked="" type="checkbox"/></p> <p>The data is processed also by a third party <input checked="" type="checkbox"/> <u>Joint Controller</u></p>

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1725>

² **Personal data** is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

³ In case of more than one controller (e.g. joint FRA research), all controllers need to be listed here

⁴ This is the unit that decides that the processing takes place and why.

⁵ Is the FRA itself conducting the processing? Or has a provider been contracted?

Cisco Webex who is offering the online meetings and events service for FRA

email: privacy@cisco.com

Sub-processors

- Amazon Web Services ([online contact form](#))
- WalkMe legal@walkme.com

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Please provide a very concise description of what you intend to achieve with the processing operation. Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing. If you do this on a specific legal basis, mention it as well (e.g. staff regulations for selection procedures).

The Agency uses the Cisco Webex Meetings service, a cloud-based web and video conferencing solution made available by Cisco to organise and host web meetings. The Service enables global employees and virtual teams to collaborate in real time, on mobile devices or video systems with meetings, events, training, and support services. Please note that some meetings may be recorded. The Agency will inform all meeting attendees prior to recording and Webex will display a red circle visible to all participants indicating that the meeting is being recorded.

4) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

- | | |
|--|-------------------------------------|
| FRA staff | <input checked="" type="checkbox"/> |
| Non-FRA staff (third party participants) | <input checked="" type="checkbox"/> |

5) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

Registration Information

Name, email address, password, public IP address, browser, phone number (optional), mailing address (optional), geographic region, avatar (optional), billing information, user information included in the customer's active directory (if synched), Unique User ID (UUID)

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 your client (as applicable), service version, actions taken, geographic region, 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 nonscreen-sharing sessions, number of participants, host name, meeting site url, meeting start/end time, subscription type, username of attendees, meeting start/end time, subscription info, screen resolution, join method, performance, troubleshooting, and diagnostics information, call attendee information, including email addresses, IP address, username, phone numbers, room device information

Meeting host and meeting attendee information to be used for billing purposes.

User-Generated Information

Meeting and call recordings, transcriptions of call recordings, uploaded files (for webex events and training only)

6) Recipient(s) of the data (Article 31.1 (d))

*Recipients are all parties who have access to the personal data. Who will have access to the data **within** FRA? Who will have access to the data **outside** FRA? No need to mention entities that may have access in the course of a particular investigation (e.g. OLAF, EO, EDPS).*

Designated **FRA** staff members
This includes the Agency's meeting organisers who opt to make use of the Webex service.

Recipients **outside** FRA:

Cisco Webex
Amazon Web Services
WalkMe

7) Transfers to third countries or international organisations (Article 31.1 (e))⁶

If the personal data are transferred outside the European Economic Area or to international organisations, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Transfer outside of the EU or EEA

Yes

No

If yes, specify to which country: Texas, North Carolina and California, USA

Transfer to international organisation(s)

Yes

No

If yes specify to which organisation:

Legal base for the data transfer

Transfer on the basis of the European Commission's adequacy decision (Article 47) EU-US Privacy Shield

Transfer subject to appropriate safeguards (Article 48.2 and .3), specify:

a) A legally binding and enforceable instrument between public authorities or bodies.

Standard data protection clauses, adopted by

b) the Commission, or

c) the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2) .

d) Binding corporate rules, Codes of conduct , Certification mechanism pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679, where the processor is not a Union institution or body.

Subject to the authorisation from the European Data Protection Supervisor:

Contractual clauses between the controller or processor and the controller, processor or the recipient of the personal data in the third country or international organisation.

Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.

Transfer based on an international agreement (Article 49), specify:

⁶ **Processor** in a third country using standard contractual clauses, a third-country public authority you cooperate with based on a treaty. If needed, consult your DPO for more information on how to ensure safeguards.

Derogations for specific situations (Article 50.1 (a) –(g))

- N /A
- Yes, derogation(s) for specific situations in accordance with article 50.1 (a) –(g) apply
In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):
- (a) The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards
- (b) The transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request
- (c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person
- (d) The transfer is necessary for important reasons of public interest
- (e) The transfer is necessary for the establishment, exercise or defense of legal claims
- (f) The transfer is necessary in order to protect the vital interests of the data subject or of other persons, where the data subject is physically or legally incapable of giving consent
- (g) The transfer is made from a register which, according to Union law, is intended to provide information to the public and which is open to consultation either by the public in general or by any person who can demonstrate a legitimate interest, but only to the extent that the conditions laid down in Union law for consultation are fulfilled in the particular case

8) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Please indicate the starting point and differentiate between categories of persons or data where needed (e.g. in selection procedures candidates who made it onto the reserve list vs. those who didn't). Are the data limited according to the adage "as long as necessary, as short as possible"?

Registration and host and usage information are kept for 7 years from when the service is terminated.

User Generated Information are deleted within 60 days from when the service is terminated.

9) Technical and organisational security measures (Article 31.1(g))

Please specify where/how the data are stored during and after the processing; please describe the security measures taken by FRA or by the contractor

How is the data stored?

- Document Management System (DMS)
- FRA network shared drive
- Outlook Folder(s)
- CRM
- Hardcopy file
- Cloud (give details, e.g. cloud provider)
- Servers of external provider

User-Generated Information is stored in Cisco's data center closest to the Agency's location, i.e. Amsterdam, Netherlands. Billing data is stored in Texas and North Carolina, USA. Webex Analytics data (these include Registration, Host and Usage information utilized to provide analytics capabilities and reports) is stored in California and Texas, USA.

10) Exercising the rights of the data subject (Article 14 (2))

How can people contact you if they want to know what you have about them, want to correct or delete the data, have it blocked or oppose to the processing? How will you react?

See further details in the privacy notice: e-mail to contact@fra.europa.eu

Data subject rights

- Right of access
- Right to rectification
- Right to erasure (right to be forgotten)
- Right to restriction of processing
- Right to data portability
- Right to object
- Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Right to have recourse
- Right to withdraw consent at any time