

Cisco Webex Meetings

The European Union Agency for Fundamental Rights (FRA or Agency) processes the personal data of a natural person in compliance with Regulation 2018/1725 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.

This privacy notice explains FRA's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognise that information privacy is an ongoing responsibility, and we will update this notice where necessary.

1. [Why do we collect personal data?](#)
2. [What kind of personal data are collected?](#)
3. [How do we collect your personal data?](#)
4. [Who is responsible for processing your personal data?](#)
5. [Which is the legal basis for this processing operation?](#)
6. [Who can see your data](#)
7. [Do we share your data with other organisations?](#)
8. [Do we intend to transfer your personal data to Third Countries/International Organizations](#)
9. [When will we start the processing operation?](#)
10. [How long do we keep your data?](#)
11. [How can you control your data?](#)
 - 11.1. [Your data protection rights](#)
12. [What security measure are taken to safeguard your personal data?](#)
13. [What can you do in the event of a problem?](#)
14. [How do we update our privacy notice?](#)

1. Why do we collect personal data?

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.

2. What kind of personal data are collected?

The following categories and types of personal data necessary for the processing operation described above are collected:

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 (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 (organizer) and meeting attendee information 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)

3. How do we collect your personal data?

We collect your data when you register and use the Cisco Webex service.

4. Who is responsible for processing your personal data?

The Agency is the legal entity responsible for the processing of your personal data and determines the objective of this processing activity. The Head of Corporate Services Unit is responsible for this processing operation.

5. Which is the legal basis for this processing operation?

Conducting online meetings is necessary for the management and functioning of the Agency. Therefore, the processing is lawful under Article 5(a) of Regulation (EU) No 2018/1725.

6. Who can see your data?

You as a user of the service, the Agency and Cisco have access to the registration information and user generated information as explained above in par. 2.

The Agency and Cisco also have access to the host and usage information.

Cisco is also using the following third party service providers:

Amazon Web Services (AWS) which has access to limited Host & Usage Information and meeting media traffic. AWS is used to transiently process real-time meeting lifecycle information such as meeting participants, meetings start and end times. This information is deleted once the meeting has ended. AWS may process real-time meeting data such as VoIP, video and high frame rate sharing data. This information is not retained in AWS once the meeting has ended.

WalkME, which has access to the Unique User ID (UUID) and user region in order to provide users with a step-by-step tour and guidance on how to use Webex Meetings online site.

7. Do we share your data with other organisations?

Personal data is processed only by the entities mentioned above. In case that we need to share your data with further third parties, you will be notified to whom your personal data has been shared with.

8. Do we intend to transfer your personal data to Third Countries?

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.

Detailed information on data transfers provided by CISCO Webex is also available here:

- <https://trustportal.cisco.com/c/dam/r/ctp/docs/privacydatasheet/collaboration/cisco-webex-meetings-privacy-data-sheet.pdf>
- <https://www.cisco.com/c/en/us/about/trust-center/gdpr.html>

It is worth noting that “Cisco is certified under both the EU and Swiss - US Privacy Shield. We have achieved accreditation under the EU Binding Corporate Rules with policies fully aligned to GDPR.”¹

9. When we will start the processing operation?

We will start the processing operation upon your registration to the Cisco Webex service i.e.

- In case you are a meeting attendee when joining a Webex meeting
- In case you are the host (meeting organiser) when your host profile is created (this applies to FRA staff only)

10. How long do we keep your data?

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.

11. How can you control your data?

Under Regulation 2018/1725, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information. You are not required to pay any charges for exercising your rights except in cases where the requests are manifestly unfounded or excessive, in particular because of their repetitive character.

We will reply to your request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

You can exercise your rights described below by sending an email request to contact@fra.europa.eu

¹ <https://www.cisco.com/c/en/us/about/trust-center/gdpr.html>

11.1. Your data protection rights

a. Can you access your data?

You have the right to receive information on whether we process your personal data or not, the purposes of the processing, the categories of personal data concerned, any recipients to whom the personal data have been disclosed and their storage period. Furthermore, you can have access to such data, as well as obtain copies of your data undergoing processing.

b. Can you modify your data?

You have the right to ask us to rectify your data you think is inaccurate or incomplete at any time.

c. Can you restrict us from processing your data?

You have the right to block the processing of your personal data when you contest the accuracy of your personal data or when the Agency no longer needs the data for completing its tasks. You can also block the processing activity when the operation is unlawful, and you oppose to the erasure of the data.

d. Can you delete your data?

You have the right to ask us to delete your data when the personal data are no longer necessary for the purposes for which they were collected, when you have withdrawn your consent or when the processing activity is unlawful. In certain occasions we will have to erase your data in order to comply with a legal obligation to which we are subject.

We will notify to each recipient to whom your personal data have been disclosed of any rectification or erasure of personal data or restriction of processing carried out in accordance with the above rights unless this proves impossible or involves disproportionate effort from our side.

You may delete User-Generated Information from your account through the My Webex Page at any time during the term of your subscription.

e. Can you request the transfer of your data to a third party?

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or for the performance of a contract or for entering into a contract and the processing is automated.

You may export all User-Generated Information through the My Webex Page.

f. Do you have the right to object?

Yes, you have the right to object when you have legitimate reasons relating to your particular situation. Moreover, you will be informed before your information is disclosed for the first time to third parties, or before it is used on their behalf, for direct marketing purposes.

g. Do we do automated decision making, including profiling?

We do not perform automated decision making.

12. What security measures are taken to safeguard your personal data?

The Agency has several security controls in place to protect your personal data from unauthorised access, use or disclosure. We keep your data stored on our internal servers with limited access to a specified audience only.

13. What can you do in the event of a problem?

a) The first step is to notify the Agency by sending an email to contact@fra.europa.eu and ask us to take action.

In case you wish to contact CISCO Webex you can do so by sending an email to: privacy@cisco.com

b) The second step, if you obtain no reply from us or if you are not satisfied with it, contact our Data Protection Officer (DPO) at dpo@fra.europa.eu.

c) If you are not satisfied with the above actions you can lodge a complaint with the EDPS at <http://www.edps.europa.eu>, who will examine your request and adopt the necessary measures.

14. How do we update our privacy notice?

We keep our privacy notice under regular review to make sure it is up to date and accurate.

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