



EUROPEAN
COURT
OF AUDITORS

Data Protection – Privacy Statement

Videoconferencing services (Cisco Webex)

This privacy statement concerns the European Court of Auditors' (ECA) processing of personal data in the context of videoconferencing calls and virtual meetings provided through Cisco Webex in which an ECA user is the organizer of the meeting.

The manner in which the ECA processes and protects your personal data is described below.

Who is responsible for handling your data?

The ECA is the controller when organising Webex Meetings and Cisco is the processor for the personal data processed by Webex Meetings to provide its functionality.

Why and how do we collect your data?

ECA collects and uses your personal data in order to provide web-based video and audio-conferencing services, offering the possibility to organise meetings with equal participants, meetings/presentations for a wide audience for events in a panel/audience format, and training sessions. More specifically, personal data are processed to:

- identify the 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 an ECA user 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).

To act as an organizer, the ECA user needs to have a personal account on the Cisco Webex system. The source of their personal data (account data) is the request made to the ECA Service Desk for creating a WebEx account.

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.

What are the rules governing the use of your data?

[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 (the “**EUDPR**”) is the legal framework for the processing of personal data within the Court.

The legal basis for the processing of your personal data is the article 5.1.a of Regulation (EU) 2018/1725 interpreted in the light of recital 22, since it is necessary for the performance of tasks carried out in the public interest by the European Court of Auditors.

What personal data do we process?

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 the IT Directorate.
 - 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 for each participant for the duration of the conference.

- **User Generated Information:** Meeting and Call Recordings (as decided and under the Organizer’s controllership).
- **TAC Support Information:** Contact information of ICT technical staff working on the provision of the services.

How long do we keep your data?

- **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.
- **Invoicing information** (subset of previous category): 7 years maximum
- **Host Registration Information:** while the account is active; name and userID is maintained for 7 years after contract termination. A request can be made to delete this data.

- **Information generated by the end user during a meeting:** 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.
- **TAC (Technical Assistance Center) Support Information** (i.e. Contact information): is kept for up to 10 years (referring to the duration of keeping the support ticket). A request can be made to delete this data.

Who has access to your data and to whom will your data be disclosed?

Access to your personal data is provided to the ECA 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 ECA 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 (data processor) 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.

How do we safeguard against possible misuse of or unauthorised access to your data?

Data sets are stored securely in the service provider’s data centre in the EU, and are therefore covered by the numerous measures taken to protect the availability, integrity and confidentiality of the institution’s electronic assets.

Access to personal data is restricted to a specific user group. Access rights are granted on a “need to know” basis, taking account of the role, post and responsibilities of the user concerned. These rights are continually updated as staff assignments change.

The ECA’s Secretary-General has overall responsibility for implementation of the rules on access rights and compliance with the rules on data protection, but has delegated responsibility in these areas to different entities. The Court has an information security policy, and an Information Security Officer who ensures that the policy is implemented correctly and that the related checks are tested for efficiency.

Cisco Webex Meetings service is certified under [ISO/IEC 27001, which covers its organisational and technical](#) security measures for the protection of your personal data.

What are your rights and how can you contact us?

Your rights in respect of your personal data are set out in Articles 17 to 24 EUDPR. This [document](#) contains further details about your rights. In sum:

- you have the right to access your personal data and have them rectified where they are inaccurate or incomplete;
- under certain circumstances (e.g. when data are no longer necessary for the purpose for which they were collected or processed, or if you withdraw consent to processing), you have the right to ask us to erase your personal data;
- you also have the right to restriction of processing in certain circumstances (e.g. when we no longer need your personal data, but you require them for preparing, exercising or defending legal claims);
- where applicable, you have the right to object to the processing of your personal data on grounds relating to your situation, and the right to data portability;
- where the processing of your personal data is based on your consent, you may withdraw that consent at any time, following which your personal data will be irrevocably removed from our records without undue delay and you will be informed thereof, unless such deletion is prevented by a legal/contractual obligation.
- You are not subject to automated decisions.

We will consider your request, take a decision, and notify you of it without undue delay, and in any event within one month of receiving the request. This period may be extended by two further months, where necessary (based on the complexity and number of requests).

You may exercise your rights by contacting the data controller at ECA-HOWCANWEHELP@eca.europa.eu.

You may contact our DPO (ECA-Data-Protection@eca.europa.eu) if you have any concern or complaint about the processing of your personal data¹.

You have the right to lodge a complaint about the processing of your personal data with the EDPS (edps@edps.europa.eu)²

¹ Article 7 (3) of Decision No 40-2021 adopting implementing rules concerning the Data Protection Officer pursuant to Article 45(3) of Regulation (EU) 2018/1725 states: “Consultation and complaints: (3) A person who has questions or complaints concerning data protection at the Court should in the first instance address these to the DPO, without prejudice to their right to contact the EDPS directly. The DPO may launch an investigation as described in Article 8 of this Decision upon such a question or complaint.”

² Article 63 EUDPR - Right to lodge a complaint with the European Data Protection Supervisor: “1. Without prejudice to any judicial, administrative or non-judicial remedy, every data subject shall have the right to lodge a complaint with the European Data Protection Supervisor if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.”