



European Labour Authority

DATA PROTECTION OFFICER

RECORD OF PROCESSING OPERATIONS ON PERSONAL DATA

DPR-ELA-2023-0005 ELA meetings through Webex

1 PART 1: PUBLIC - RECORD (ARTICLE 31¹)

1.1 GENERAL INFORMATION

Record reference	DPR-ELA-2023-0005
Title of the processing operation	ELA meetings through Webex
Controller entity	European Labour Authority, Resources, ICT Sector
Joint controllers	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES, fill in details below
Processor(s)	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES, fill in details below
Internal organisation(s)/entity(ies) Names and contact details	<input checked="" type="checkbox"/> N/A <input type="checkbox"/> YES
External organisation(s)/entity(ies) Names and contact details	<input type="checkbox"/> N/A <input checked="" type="checkbox"/> YES CISCO International Limited, 1 Callaghan Square Cardiff, CF10 5BT, United Kingdom
Data Protection Officer Name and contact details	Laura NUNEZ BAREZ European Labour Authority Landererova 12, 811 09 Bratislava I Slovakia Email: data-protection@ela.europa.eu
Corporate Record	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Language of the record	English

¹ Pursuant to **article 31** of the new data protection regulation for EU institutions and bodies (**Regulation (EU) 2018/1725**) each controller and processor have to maintain a **record of processing activities** under its responsibility that contains at least the information listed under that article.

1.2 PURPOSE AND DESCRIPTION OF THE PROCESSING

1.2.1 Purpose

The European Labour Authority (ELA) 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 European Labour staff and when a meeting is organized 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 the ELA would act as an organizer, he/she needs to create an 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 for the specific event/meeting and share it with the participants before the video conference is initiated.

1.2.2 Processing for further purposes

- Archiving in the public interest
- Scientific or historical research purposes
- Statistical purposes

Safeguards in place to ensure data minimisation

- Pseudonymisation
- Any other, specify

Periodically and for statistical and invoicing purposes, the contractor shall send the ELA a report containing the full list of records containing: the conference identifier, its start date and duration. This method makes it possible to completely pseudonymize personal data.

1.2.3 Modes of processing

1. Automated processing (Article 24)
 - a. Computer/machine
 - i. automated individual decision-making , including profiling
 - ii. Online form/feedback
 - iii. Any other, specify
2. Manual processing
 - a. Word documents
 - b. Excel sheet
 - c. Any other, specify

Description

Information is collected automatically by computer applications by the contractor for statistical and invoicing purposes, without leading to any individual decision relating to the subjects.

1.2.4 Storage medium

- 1. Paper
- 2. Electronic
 - a. Digital (MS documents (Word, excel, Powerpoint), Adobe pdf, Audiovisual/multimedia assets, Image files (.JPEG, .PNG, etc.))
 - b. Databases
 - c. Servers
 - d. Cloud
- 3. External contractor premises

Description:

By definition, transmission systems must not store information beyond the time necessary for the routing of data during the duration of a session. An exception is the storage of statistics used for system performance analysis and billing of the service. Billing information is stored by the contractor on servers in the EU and UK, while statistics are stored by the subcontractor (Cisco System) in the EU, UK and USA. All information resides in dedicated servers on the premises of the service contractor, encoded in an unstructured binary format.

1.3 DATA SUBJECTS AND DATA CATEGORIES

1.3.1 Data subjects' categories

1. Internal to organisation	The persons concerned may be part of the ELA, either as organisers or simply as participants. The conference organizer is necessarily a member of the ELA.
2. External to organisation	External persons may also be involved as conference participants.

1.3.2 Data categories/fields

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.

Cisco Technical Assistance Case (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).

1.3.2.1 Special categories of personal data

Indicate if the processing operation concerns any 'special categories of data' which fall(s) under Article 10(1), which shall be prohibited unless any of the reasons under article 10(2) applies:

Yes , the processing concerns the following special category(ies):

Data revealing

- racial or ethnic origin,
- political opinions,
- religious or philosophical beliefs,
- trade union membership,

Or/and,

- Genetic data, biometric data for the purpose of uniquely identifying a natural person,
- Data concerning health,
- Data concerning a natural person’s sex life or sexual orientation.

N/A

1.3.2.2 Data related to 'criminal convictions and offences'

The data being processed contain sensitive data which fall(s) under Article 11 'criminal convictions and offences'	N/A <input checked="" type="checkbox"/> Yes <input type="checkbox"/>
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1.4 RETENTION PERIOD

Indicate the administrative time limit(s) for keeping the personal data per data category, and if known, specify the start/end date, or describe the specific start/end moment of each time limit:

Data category	Retention period
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	<ul style="list-style-type: none"> • 7 years after contract termination • On User-request by sending a request to 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	<ul style="list-style-type: none"> • Up to 10 years • On User-request by sending a request to privacy@cisco.com or opening a TAC service request

Description

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.

1.5 RECIPIENTS

Origin of the recipients of the data	
1. <input checked="" type="checkbox"/> Within the EU organization	The conference organizer has the participants' identifiers for the duration of the session.
2. <input checked="" type="checkbox"/> Outside the EU organization	<p>The Web Conference service is fully provided by Cisco System. It states that only duly authorised personnel of this company manage user data in compliance with the ELA's personal data protection standards.</p> <p>The configuration elements specific to the service to the ELA are controlled directly by the organizer (for example, the deletion of data from a conference immediately after its end). In addition, participants from outside the ELA shall also hold, for the duration of the session:</p> <ul style="list-style-type: none"> • the list of names of participants • the content of the conference (audio, video, files)

Categories of the data recipients
1. <input checked="" type="checkbox"/> A natural or legal person 2. <input type="checkbox"/> Public authority 3. <input type="checkbox"/> Agency 4. <input checked="" type="checkbox"/> Any other third party, specify

Authorised staff of the contract service provider, Cisco System.

All statistical and invoicing data shall be accessible to the Contractor's authorised staff with full access; this information is available to the ELA upon request.

Data concerning the content of the conference and the list of participants' names are available to all participants during the duration of the conference.

If a local record is activated by the organizer (impossible by the central organizer), it will also possess this information.

The user identifier (email, location, phone, etc.) is accessible only to the organizer of the conference. The organizer's account data shall be accessible to authorised technical staff directly concerned by the service at the contractor's premises.

The technical support data are available to any contractor engineer assigned to the technical support (TAC); this information is available to the ELA and can be deleted on request. The content of any registration is announced as available only to the organizer and with an alternative password.

1.6 INTERNATIONAL DATA TRANSFERS

Transfer to third countries or international organisations of personal data
1. Transfer outside of the EU or EEA <input type="checkbox"/> N/A, transfers do not occur and are not planned to occur <input checked="" type="checkbox"/> YES,

Country(ies) to which the data is transferred	UK and USA
<p>2. Transfer to international organisation(s)</p> <p><input checked="" type="checkbox"/> N/A, transfers do not occur and are not planned to occur</p> <p><input type="checkbox"/> Yes, specify further details about the transfer below</p>	
<p>3. Legal base for the data transfer</p> <p><input type="checkbox"/> Transfer on the basis of the European Commission's adequacy decision (<i>Article 47</i>)</p> <p><input checked="" type="checkbox"/> Transfer subject to appropriate safeguards (<i>Article 48.2 and .3</i>), specify:</p> <p>2. (a) <input type="checkbox"/> A legally binding and enforceable instrument between public authorities or bodies.</p> <p>Standard data protection clauses, adopted by</p> <p>(b) <input checked="" type="checkbox"/> the Commission, or</p> <p>(c) <input type="checkbox"/> the European Data Protection Supervisor and approved by the Commission, pursuant to the examination procedure referred to in Article 96(2).</p> <p>(d) <input type="checkbox"/> Binding corporate rules, <input type="checkbox"/> Codes of conduct , <input type="checkbox"/> 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.</p> <p>3. Subject to the authorisation from the European Data Protection Supervisor:</p> <p><input type="checkbox"/> 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.</p> <p><input type="checkbox"/> Administrative arrangements between public authorities or bodies which include enforceable and effective data subject rights.</p> <p><input type="checkbox"/> Transfer based on an international agreement (<i>Article 49</i>), specify</p>	

1.7 INFORMATION TO DATA SUBJECTS ON THEIR RIGHTS

Rights of the data subjects
<i>Article 17 – Right of access by the data subject</i>
<i>Article 18 – Right to rectification</i>
<i>Article 19 – Right to erasure (right to be forgotten)</i>
<i>Article 20 – Right to restriction of processing</i>
<i>Article 21 – Notification obligation regarding rectification or erasure of personal data or restriction of processing</i>
<i>Article 22 – Right to data portability</i>
<i>Article 23 – Right to object</i>
<i>Article 24 – Rights related to Automated individual decision-making, including profiling</i>

1.7.1 Privacy statement

The data subjects are informed about their rights and how to exercise them in the form of the a privacy statement attached to this record.

Publication of the privacy statement

Published on website

Web location:

- ELA internal website (URL:ELA SharePoint on personal data protection)
- External website (URL: <https://www.ela.europa.eu/en/privacy-policy>)

Other form of publication, specify
Internal Register.

Guidance for Data subjects which explains how and where to consult the privacy statement is available and will be provided at the beginning of the processing operation.

Description:

Guides in data subjects' rights available on ELA website.

1.8 SECURITY MEASURES

Short summary of overall Technical and Organizational Measures implemented to ensure Information Security:

Description:

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Labour Authority or of its contractors.

The European Labour Authority's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the European Labour Authority, and by the confidentiality obligations deriving from the General Data Protection Regulation.

In order to protect personal data, the European Labour Authority has put in place a number of technical and organisational measures. 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.