



3 July 2023
EMA/304030/2023

Records of data processing activity for the use of Cisco Webex Meetings and Webex Events participants

1.	Last update of this record, version number:	3 July 2023, Version 1
2.	Reference number:	EMA/304030/2023
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Information Management Division Contact: Datacontroller.infomanagement@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor (where applicable)	Cisco Systems, Inc. EMEAR Privacy Officer Haarlerbergweg 13-19, 1101 CH Amsterdam-Zuidoost NETHERLANDS privacy@cisco.com
7.	Purpose of the processing	The purpose of this data processing activity is to allow meeting participants to use the service, and to perform troubleshooting where necessary, in the context of the performance of Agency tasks, including: <ul style="list-style-type: none">• Organisation of virtual meetings with regulatory partners and stakeholders, including scientific committees and working parties



		<ul style="list-style-type: none"> • Hosting of online events like scientific workshops and webinars • Broadcasting of a meeting or event to reach wider audiences and the public • Recording meetings and events to allow on demand access to shared knowledge as well as for minute-taking and reporting purposes • Facilitating dialogue and participant engagement with internal or external participants of meetings and events, in the context of performing of the Agency tasks, including: <ul style="list-style-type: none"> – Managing questions and answers during meetings and events – Capturing input and feedback from participants on specific topics via polls, questions or quizzes – For business purposes related to the original purpose of the event (e.g. capturing input and feedback to be used in the context of related business tasks) and/or for communication following the event (e.g. publication of testimonials on the business purpose) • To provide technical support where this is necessary.
8.	Description of categories of persons whose data EMA processes and list of data categories	<p><u>Categories of persons whose data EMA (and their processor) processes:</u></p> <p>Users of Webex meetings & Webex webinar services at the Agency. Such users include:</p> <ul style="list-style-type: none"> • EMA staff members (including contractors) as well as representatives of National Competent Authorities • International partners (international organisations and third country medicines regulators) • Expert communities. <p><u>Data Categories processed as part of this activity:</u></p> <p>User Information: Activation Codes, Display Name, Email Address, Name, Profile Picture or Avatar image (optional, only applicable if provided by you), Password, Company Name, Billing Contact Name, Organization ID, Universal Unique Identifier (UUID), User information included in your organization directory, Pronouns (optional, only applicable if enabled by your organisation and you).</p> <p>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, Service Version, Actions Taken, Activity logs, Geographic Region, Country Code, Time Zone, Meeting Session Information (e.g. date and time, frequency,</p>

		<p>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, Screen Resolution, Join Method, Performance, Troubleshooting, and Diagnostics Information, Meeting Host Information, Host Name and ID, Meeting Site URL, Meeting Start/End Time, Meeting Title and Call attendee information, including e-mail addresses, username, phone numbers, room device information.</p> <p>User-generated Information: Meeting and call recordings*, transcriptions of call recording* (in user's "My Webex" secure personal account page), Uploaded files like documents & presentations, shared and only available during the meeting with meeting participants, Spaces Activity (date, time, person engaged and the activity), Messages (content, sender, recipients, date, time, and read receipts), Content Shared (files, file names, sizes and types and whiteboard content), Meetings and Calls Information (title, invitation content, participants, link, date, time, duration and quality ratings), Presence (user status), Admin-generated information, e.g., Contact Service contact list, Voice (optional, only applicable if provided by user).</p> <p>Additional data when using Slido:</p> <p><u>User-Generated Information:</u> Questions, polls, answers, ideas, chats, any content shared or created by participants and hosts. Such data may be anonymous unless the event organisers require participants to provide their name and email address for the stated business purpose of the event (e.g. capturing input and feedback to be used in the context of the respective business task) and/or for communication following the event (e.g. publication of testimonials on the business purpose), or unless participants sign-in with their EMA Webex account in the Webex meeting or event and provide their personal information. If you are not an anonymous participant, it is considered that you provide consent for this data to be used by EMA event organisers for the business purposes.</p> <p><u>User Technical Information:</u> Device data (e.g. hardware model, operating system version, unique device identifiers), Log data (e.g. your search queries, details about your connection such as IP address, date, time, edge-location, ssl-protocol, ssl-cipher or time taken to serve you requested site, device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL), Location information (IP</p>
--	--	---

		<p>address), Unique users' IDs Browser local storage and application data caches.</p> <p><u>Cookies:</u> Essential cookies collected through embedded browser utilized in the Webex-Slido interface.</p> <p><u>Host Information</u></p> <p><u>Participant Information</u></p> <p>TAC support Information: Name, E-mail Address, Phone number of the Employee appointed to open the service Request, Authentication Information (exclusive of passwords), Work organisation and responsibilities, Current employer name.</p> <p>TAC Customer Case Attachment: files provided by customers that might contain personal data and data that may include Device Configuration (e.g., running config and start-up config, SNMP Strings (masked); Interface description, Command Line Interface (CLI) (i.e., Show Commands, such as Show Version), Product Identification Numbers, Serial Numbers, Host Names, Sys-description (has device location), IP Addresses, Operating System (OS) Feature Sets, OS Software Versions, Hardware Versions, Installed Memory, Installed Flash, Boot Versions, Chassis Series, Slot IDs, Card Types, Card Families, Firmware Versions, MAC Address, SNMP MIBs (ACLs, CDP).Cisco TAC does not intentionally collect or process personal data via Customer Case Attachments. Cisco instructs customers to provide the least amount of personal data possible.</p> <p>Information Collected Related to Optional Features: Information collected by cookies, local storage, and other browser storage technologies.</p> <p>*Please note, that when a meeting or event is planned to be recorded the Agency will first inform all meeting attendees with a disclaimer notice in writing prior to the event; secondly, during the meeting or call and prior to recording attendees will be reminded that the session will be recorded; thirdly, Webex will display a red circle visible to all participants indicating that the session is being recorded.</p>
9.	Time limit for keeping the data	<ul style="list-style-type: none"> • Host and Usage information is retained for 3 years • User information will be retained for as long as EMA's subscription for Webex is active. After the termination of the service all User Information will be deleted. Apart from Name and UUID are maintained 7 years from termination as

		<p>part of Cisco's business records and are maintained to comply with Cisco's financial and audit requirements</p> <ul style="list-style-type: none"> • Where calls are recorded, recording and transcriptions will be retained for 60 days • User Generated Information is retained for 60 days after services are terminated to give Customers opportunity to download their content • Information collected related to optional features (where a user opts-in) is kept for 3 years. information collected related to those optional features is maintained as part of Cisco's business records • Uploaded content files (e.g. presentations) clear at the end of each Webex meeting • Slido Data (Slido is a WebEx plug-in) is retained until account termination. Technical Information and cookie information for Slido is kept for a maximum of 1 year • Akamai (a sub-processor used by Cisco) to provide the service do not store data but may store IP addresses in logs for a maximum of 3 years.
10.	Recipients of the data	<ul style="list-style-type: none"> • Internally by staff within the EMA Division responsible for Cisco Webex Meetings & Webinars for the purposes of providing the service • A defined population of approved EMA network administrators from within the Agency's Information Management Division (I- Division) and Information Security Service (DED-INS) (who can temporarily access all exchanges made within the Webex platform if there is a legitimate reason to do so, e.g. for the purpose of providing technical support and compliance with applicable terms of use and EMA's code of conduct) • Cisco (to provide the service and technical support where necessary) • Cisco's sub-processor and affiliates: <ul style="list-style-type: none"> – Akamai (EU and US) – AWS (Germany, Netherlands, Ireland, US) – Slido (Ireland, Germany) – Salesforce.com (for technical support – TAC) (US) – Cisco entities providing technical support (TAC) (US, India, Jordan, Poland, Bulgaria, Netherlands, Belgium) – CapGemini (India) – Vbrick (Germany, Ireland).
11.	Are there any transfers of personal data to third	EMA has taken all reasonable contractual measures to restrict data transfers to the minimum required for the service, and on

	<p>countries or international organisations? If so, to which ones and with which safeguards?</p>	<p>the basis that additional safeguards are in place and that enforceable data subject rights and effective legal remedies for data subjects are available.</p> <p>By default, all data, including User-Generated Information, created by users when they use Webex, is stored in Cisco’s data centres in the EU, primarily from the Frankfurt data centre, and as backup from the Amsterdam data centre. In the following circumstances data may be shared outside of the EU:</p> <ul style="list-style-type: none"> • Where users engage in collaboration with other users outside of the EU, this happens during Webex meetings when meeting participants join from outside the EU • Where users request technical support through Cisco’s Technical Assistance Center (“TAC”) or where the Audio-visual support team escalates the technical issues to Cisco and requests help from Cisco’s Technical Assistance Center (“TAC”). In which case the information that a user provides within the initial TAC request may be transferred outside of the EU region to the following entities / locations: <ul style="list-style-type: none"> – AWS (US) – Salesforce.com (US) – Cisco Systems Private Limited (India) – CapGemini (India) – Cisco - Estarta (Jordan) – Cisco Systems, Inc (USA) • IP address data processed by Akamai (a sub-processor used by Cisco to provide content delivery network (CDN) services) may be transferred to the US under the EU standard contractual clauses (SCCs) with strict access control and appropriate safeguards in place (see section 4). <p>Cisco uses Binding Corporate Rules (Controller) and Standard Contractual Clauses to enable the lawful use of data across jurisdictions. Detailed information on data transfers performed by CISCO Webex is also available below:</p> <p>https://trustportal.cisco.com/c/r/ctp/trust-portal.html#/1554085468927155</p> <p>https://www.cisco.com/c/en/us/about/trust-center/gdpr.html</p> <p>https://trustportal.cisco.com#/1628093328605789</p>
12.	<p>General description of security measures, where possible.</p>	<p>Access to the Webex platform at EMA is integrated with the EMA Identity and Access Management system. Users must authenticate using a secure username and password managed by EMA and access from outside the EMA IT network is protected by multi-factor authentication (MFA). Data is encrypted at rest and in transit.</p>

		<p>In order to protect your personal data, the EMA has put in place several strong contractual safeguards complemented by technical and organisational measures.</p> <p>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.</p> <p>Cisco also implement appropriate technical and organisational security measures. For more information on these, see here.</p>
13.	<p>For more information, including how to exercise your rights to access, rectification, erasure, restriction object and data portability (where applicable), see the privacy statement:</p>	<p>Details concerning the processing of your personal data and your data subject rights are available on the Agency’s website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement</p> <p>Here you may find the data protection notice regarding this specific data processing operation as well.</p> <p>DPN - WebEx EMA/304029/2023 https://docs.eudra.org/webtop/drl/objectId/090142b28578adfc</p>