

WEB CONFERENCING

Record of processing activity	
Title	Web conferencing
Name and contact details of controller	ENISA, Resources Department (IT), ITU@enisa.europa.eu
Name and contact details of DPO	dataprotection@enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	As regards the use of Cisco Webex: BT Global Services Belgium, under specific contract with ENISA, in the context of the European Commission DG DIGIT Framework Contract 7540 (WACS II). Subprocessor CISCO is providing the Webex platform.
Purpose of the processing	<p>To support ENISA's internal and external communication, as well as the organisation of ENISA's online conferences and events. In particular, two web conferencing tools are used: i) Microsoft Skype for Business (S4B) on premise and ii) Cisco Webex provided by BT Global Services as a service, through the European Commission (DG DIGIT). The tools are in more detail used for the following purposes:</p> <p>a) Internal and external communication (S4B and Webex): the purpose of the processing operation is to allow communication and collaboration between the Agency staff (calls, meetings, chats), Commission staff and externals (contractors, researchers etc.).</p> <p>b) Federation with other EU Agencies (only S4B): the purpose of the processing operation is to allow communication and collaboration between the Agency staff and staff in other EU Agencies. A directory of contact data is made available, so that ENISA staff can contact colleagues to S4B.</p> <p>c) Federation with public providers (only S4B): the purpose of the processing operation is to allow communication and collaboration between the Agency staff and external Skype business contacts. A directory of contact data is made available, so that ENISA staff can contact colleagues to S4B.</p> <p>d) Organisation of online conferences and events (only Webex): the purpose of the processing is to support the organisation of ENISA's online events and conferences.</p>
Description of data subjects	<p>ENISA staff.</p> <p>Staff of federated partners with whom ENISA has an agreement.</p> <p>External collaborators, contractors, etc. communicating with ENISA staff members.</p> <p>Participants in ENISA's online conferences and events.</p>
Description of data categories	<p>For S4B:</p> <p>a) Meeting/call related data (e.g. outgoing and incoming telephone numbers, email addresses of meeting attendees, call/meetings dates/times, etc.), stored on ENISA's servers. Meeting/call related data is also stored in S4B client and can be accessed by the end-user. Call logs in S4B are activated by default.</p> <p>b) The content of chat messages in S4B can be stored in the S4B client and in the user's mailbox, and can be accessed by the end-user. This feature can be activated / de-activated by the end-user in the S4B client settings, but is activated</p>

	<p>by default and stored in the same way as an email. Chat history can be deleted in the S4B client by the users. Recording of calls is possible via S4B and is by default deactivated.</p> <p>c) For internal contacts, S4B depends on the corporate active directory for contacts utilisation but also includes presence information (available, busy, do not disturb, etc.). Presence information is activated by default.</p> <p>d) For federation with other EU Agencies and public providers, the personal data provided through the contact directory includes name, email / SIP address of ENISA staff and contacts of other EU Agencies, and potentially other data, depending on chosen privacy settings, such as telephone number(s) and presence information.</p> <p>For Webex:</p> <p>a) Host registration information: name, email address password. These data are processed by CISCO (subprocessor) in order to provide for the registration of the host in a specific meeting.</p> <p>b) Meeting host information: meeting host, meeting site URL, start/end time. These data are processed by BT Global Services (processor) and CISCO for billing purposes.</p> <p>c) User generated information: meeting and call recordings, transcriptions of call recordings, uploaded files. These data are processed by CISCO in order to provide the service and are deleted after the end of the meeting. The meeting host has access to these data and can store them locally (e.g. in case that call recording is activated).</p> <p>d) Analytics data: IP address, user agent identifier, hardware type, operation system type and version, client MAC address, meeting session information, call attendee information (including email address, IP address, username, phone number), etc. These data are processed by CISCO for analytics purposes.</p>
Time limits (for the erasure of data)	<p>For S4B: Meeting/call related data is stored on ENISA's server for troubleshooting purposes for up to 6 months. The content of chat messages is stored in the S4B client for as long as the user has this feature activated or until the message history in S4B client is deleted by the user. This data is also stored in the user's mailbox and retained as per email retention policy.</p> <p>For Webex: Meeting host information is maintained for 7 years by BT Global Services and CISCO after termination of the service for audit purposes. User generated data are deleted by CISCO after each meeting. Analytics data are maintained by CISCO until the termination of the contract. Any locally stored user data will be deleted by the meeting host/organiser (ENISA) in accordance with its policy for events.</p>
Data recipients	<p>For S4B: Designated staff of ENISA IT responsible for system operation and maintenance, in case of troubleshooting or investigation of security incidents.</p> <p>For Webex: Designated staff of ENISA (meeting host/organiser), CISCO (subprocessor) and BT Global Services (processor); Designated staff of ENISA IT and EC DG DIGIT responsible for system operation and maintenance, in case of troubleshooting or investigation of security incidents.</p>
Transfers to third countries	<p>Relevant to Webex only. In particular, Webex host meeting information and analytics data are processed by Cisco (subprocessor) in US and UK. BT Global Services (processor) processes host meeting information only within UK and EU.</p> <p>BT Global Services has put in place EC Standard Contractual Clauses (SCCs) for transfers of personal data to CISCO. Communication of Webex meetings is end-to-end encrypted. BT has also approved Binding Corporate Rules (BCRs - UK DPA as lead authority). CISCO also has approved BCRs (NL DPA as lead authority).</p>
Security measures - General description	<p>Skype for Business will be operated within the secure IT environment of ENISA. General security policy and technical/organisational measures applicable to ENISA's internal IT systems is applicable for S4B.</p> <p>Webex is operated in secure servers of processor (BT Global Services) and subprocessor (CISCO). Applicable security policies of processor and subprocessor are in place.</p>
Privacy statement	<p>Available on intranet for all ENISA staff. Information on the use of CISCO Webex is provided, whenever relevant, in privacy statements of ENISA online conferences and events.</p>



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