

DATA PROTECTION NOTICE: NAPAC MEETINGS

The NAPAC meetings are organised by ECSO with the support of ENISA

The **joint data controllers** of the processing operation are ECSO and ENISA (NAPAC secretariat) who are responsible for the overall organisation of the meetings, as well as the communication with the participants before and after the end of the event. ENISA, with the agreement of ECSO, provides for the online registration of participants, as well as for the virtual organisation of the meetings via an online teleconference platform (CISCO Webex).

ENISA processes personal data in accordance with Regulation (EU) 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 data¹. The legal basis for the processing is article 5(1)(a) EUDPR, on the basis of Regulation (EU) 2019/881 (Cybersecurity Act), especially the provisions establishing the tasks of ENISA. Any meeting recordings in the context of NAPAC meetings are based on article 5(1)(d) EUDPR, i.e. the consent of the meeting participants.

ECSO processes personal data in accordance with Regulation (EU) 2016/679 (GDPR)² on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. The legal basis for the processing is article 6(1)(e) GDPR, on the basis of the provisions establishing ECSO's tasks. Any meeting recordings in the context of NAPAC meetings are based on article 6(1)(a) GDPR, i.e. the consent of the meeting participants.

The **data processor** is BT Global services that provides the online teleconference platform via a specific service contract with ENISA. The sub-processor (teleconferencing platform) used is Cisco Webex³.

The **purpose** of this processing operation is to 1) register the participants to the ECSO NAPAC meetings (where ENISA provides the secretariat), 2) provide access to the virtual sessions or meeting venue, 3) maintain the participants' list, as well as the follow up of the meeting.

The following personal data are collected:

- Contact data: first name, last name, function (optional), organisation, country, e-mail address (collected by ENISA upon registration to the event).
- Connection details for virtual session: participants' username, email (optional), device identifiers, IP address, hardware type, operation system type and version, and further technical connection data. These data are processed by CISCO Webex in order to provide the connection of the event participants to the teleconference platform.
- User generated information: Discussion chat logs, meeting recordings, uploaded files. These data are produced through the CISCO Webex platform during the event. They will be

² <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

³ <https://www.cisco.com/c/en/us/about/legal/privacy-full.html>

processed by ENISA and deleted from the CISCO Webex platform after the end of the event. Meeting recordings only take place locally at ENISA servers.

Access to your data is granted only to the ECSO and ENISA staff dealing with NAPAC secretariat matters, as well as designated staff of data processors to the extent that this is needed for the provision of the virtual meetings. Access to the data may also be granted to bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, European Anti-fraud Office – OLAF).

The retention periods for the personal data are as follows: the participants' contact data will be kept by ENISA for a maximum period of 6 months after the end of the event. Contact data for appointed NAPAC representatives are kept by ECSO for as long as the appointment lasts. The personal data related to the connection to the teleconference platform, will be retained by the relevant processor (BT/Cisco Webex) for the period necessary for the provision of the teleconferencing service. Meeting recordings are kept by ENISA only until the finalisation of the meeting minutes. Personal data will be deleted after the end of the respective retention periods.

Storage of personal data: the contact data collected upon registration at the ENISA website, as well as meeting recordings are stored on the ENISA's servers and are only processed within EU/EEA. Personal data related to the connection/use of the teleconference platform are stored in BT/Cisco Webex servers within EU/EEA and may include transfers of personal data outside EU/EEA, subject to the provisions of Chapter V Regulation (EU) 1725/2018.

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. We will consider your request, take a decision and communicate it to you. If you have any queries concerning the processing of your personal data, you may address them to ENISA or ECSO. The primary contact point for relevant requests is NAPAC_SEC@enisa.europa.eu **You may also contact** at any time the ENISA DPO at dataprotection@enisa.europa.eu.

You have the right of recourse at any time to the European Data Protection Supervisor at <https://edps.europa.eu> or the Belgian Data Protection Authority at <https://www.dataprotectionauthority.be>