



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

EMA/304029/2023

European Medicines Agency's Data Protection Notice For the Cisco Webex Meetings and Webex Events participants

The European Medicines Agency (hereinafter "EMA" or "Agency") processes the personal data of a natural person in compliance with "Regulation 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 data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC" (also referred to as "EUDPR").

This Data protection notice explains EMA's processing of personal data whilst using Cisco Webex Meetings and Webex Events cloud-based web and video conferencing service, and its plug-in Slido (Slido was acquired by Cisco Systems, Inc. in May 2021) for surveying participants feedback. These services enable the Agency to organise meetings with external participants such as EU regulatory network members and EMA scientific committees, as well as to host large public online events and webinars.

1. Who is responsible for processing your data?

1.1. Who is the data controller?

The Agency is the data controller who is responsible for ensuring compliance with your data protection rights and freedoms. Within the EMA organisation, the Head of Information Management Division is appointed as 'Internal Controller' to ensure the lawful conduct of this processing operation.

You may contact the Internal Controller via the following email address:

Datacontroller.infomanagement@ema.europa.eu

1.2. Who is the data processor?

EMA has engaged the Cisco Systems, Inc. to process data on behalf of the Agency to enable communication through the provision of online video conferencing tools and to provide support services for these tools.

The contact details of the data processor(s) are the following:

Cisco Systems, Inc.

EMEAR Privacy Officer

Haarlerbergweg 13-19, 1101 CH Amsterdam-Zuidoost NETHERLANDS

Official address Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us

Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000

An agency of the European Union



privacy@cisco.com

Details on Cisco Systems' processing activities are provided in Cisco's Privacy Data Sheet [here](#).

2. Purpose of this data 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:

- Organisation of virtual meetings with regulatory partners and stakeholders, including scientific committees and working parties
- 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:
 - 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.

In some instance data may be used for the purpose of ensuring compliance with applicable terms of use and EMA's code of conduct (in the case of administrative inquiries and disciplinary proceedings). For more information on this please see [the privacy statement for administrative inquiries and disciplinary proceedings](#).

At **no point** will your personal data be used for:

- Producing decisions that would result in legal or other significant effects impacting the rights of data subjects based solely by automated means
- Serving advertisements on EMA's platform
- Tracking your usage or content for advertising purposes
- Monitoring or interfering with your meeting traffic or content.

2.1. Personal data concerned

In this processing operation we process data directly collected from you when you access and use the Webex Meetings and Webex Event services.

Please note that where meetings or calls are to be recorded the Agency will first inform all meeting attendees with a disclaimer notice in writing prior to the event. Secondly, during the call or meeting, prior to the recording starting, 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.

The data collected may include the following:

Personal Data Category	Types of Personal Data
1.User Information	<ul style="list-style-type: none">• 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)
2.Host and Usage Information	<ul style="list-style-type: none">• Device Name• IP Address• User Agent Identifier• Hardware Type• Operating System Type and Version• Client Version

	<ul style="list-style-type: none"> • IP Addresses Along the Network Path • MAC Address of Your Client (As Applicable) • Service Version • Activity Logs / Actions Taken / Meeting Start/End Time / Meeting Title • Geographic Region / Country Code / Time Zone • Meeting Session Information (e.g., 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 • Screen Resolution • Join Method • Performance, Troubleshooting, and Diagnostics Information • Meeting Host Information • Host Name and ID • Meeting Site URL • Call attendee information, including email addresses, IP address, username, phone numbers, room device information.
3.User-Generated Information	<ul style="list-style-type: none"> • 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)

	<ul style="list-style-type: none"> • 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>4. Additional data when using Slido</p>	<ul style="list-style-type: none"> • User-Generated Information: <ul style="list-style-type: none"> – 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 • User Technical Information: Device data (e.g. hardware model, operating system version, unique device identifiers) <ul style="list-style-type: none"> – 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 address) – Unique users' IDs – Browser local storage and application data caches • Cookies: Essential cookies collected through embedded browser utilized in the Webex-Slido interface • Host Information • Participant Information

<p>5. Information Collected Related to Optional Features</p>	<ul style="list-style-type: none"> • Information collected by cookies, local storage, and other browser storage technologies.
<p>6. Information processed where Cisco Technical Assistance Service (TAC) is used</p>	<ul style="list-style-type: none"> • TAC Support information: <ul style="list-style-type: none"> – Which may include name, Email Address, Phone Number of the Employee appointed to open the service request, Authentication Information (exclusive of passwords), Work organization and responsibilities, Current employer name. • Customer Case attachments: <ul style="list-style-type: none"> – Which may include 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).

2.2. Legal basis of the processing

The use of Cisco Webex is necessary for the day-to-day functioning and management of the Agency, as mandated by EMA's Founding Regulation (EC) No 726/2004 and other Union pharmaceutical legislation.

Online meetings and communication with external stakeholders and the public are necessary for the performance of the Agency tasks carried out in the public interest. Therefore, the processing is lawful under Article 5.1 (a) of Regulation (EU) No 2018/1725.

2.3. Transfer of personal data outside of EU

EMA has taken all reasonable contractual measures to restrict data transfers to the minimum required for the service, and on the basis that additional safeguards are in place and that enforceable data subject rights and effective legal remedies for data subjects are available.

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:

- 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:
 - AWS (US)
 - Salesforce.com (US)
 - Cisco Systems Private Limited (India)
 - CapGemini (India)
 - Cisco - Estarta (Jordan)
 - Cisco Systems, Inc (US)
- 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).

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:

<https://trustportal.cisco.com/c/r/ctp/trust-portal.html#/1554085468927155>

<https://www.cisco.com/c/en/us/about/trust-center/gdpr.html>

<https://trustportal.cisco.com#/1628093328605789>

Personal Data Category	Retention period	Reason and Criteria for Retention
User Information	<p>Active Subscriptions:</p> <ul style="list-style-type: none"> • User Information will be maintained as long as the Customer maintains an active subscription (paid or free). • Terminated Service: • Customer has the ability to request deletion by opening a ticket with TAC. • Deleted once the Service is terminated. • Name and UUID are maintained 7 years from termination* 	*Name and UUID are maintained 7 years from termination as part of Cisco’s business records and are maintained to comply with Cisco’s financial and audit requirements.
Host and Usage Information	3 years.	Information generated by instrumentation and logging systems created through the use and Service delivery are maintained as part of Cisco’s business records. After the retention period, Usage Information used to conduct analytics and measure statistical performance is retained but pseudonymized, aggregated or anonymized.
User Generated Information (excluding Recordings & Transcripts, discussed below)	<p>Active Subscriptions:</p> <p>Data is retained for 60 days at EMA’s discretion.</p> <p>Terminated Service:</p> <p>User-Generated Information will be deleted once account is deactivated or terminated.</p>	To allow the data to be used for any necessary business purposes.

Recordings & Transcripts	<p>Active Subscriptions: At EMA's discretion Meeting where a meeting is recorded this is kept for 60 days.</p> <p>Terminated Service: Deleted within 60 days on Webex Meetings Platform.</p>	This is to allow for meeting minutes and notes to be written up.
Information Collected Related to Optional Features	3 years.	If a user opts-in to certain optional features (such as cookies), information collected related to those optional features is maintained as part of Cisco's business records.
Slido data	<p>Host Information: Host Information is retained until account termination.</p> <p>Participant Information: Participant Information associated with a specific meeting is retained until account termination. Participant Information associated with a specific meeting can be deleted by deleting all Slido data associated with that meeting.</p> <p>User Generated Information: User Generated Information associated with a specific meeting is retained until account termination.</p>	Data is retained to allow Slido to provide its service.
	<p>Technical Information (listed in section 2.1 under 'Additional data when using Slido'): Deleted 1 year after collection.</p>	Technical Information is kept as part of Cisco's record of service delivery, to conduct analytics and measure statistical performance.
	<p>Cookies: Maximum of one year.</p>	To provide, tailor and improve the service.

Akamai Data	Akamai do not store data but may store IP addresses in logs for a maximum of 3 years.	In order to provide content delivery services.
TAC Support Information and Customer Case Attachments	10 years and 1 day.	To ensure efficient support in case of recurring issues and to comply with Cisco audit policies related to business records of services provided to Customers (i.e., legitimate business purposes).

3. Who has access to your information and to whom is it disclosed?

The below table shows any parties external to EMA that may have access to the personal data processed, as well as the reason they need access, the type of data they can access, the location of where they may access the data from (or if they store the data, where the data is stored), and the type of encryption applied:

Who has access	Purpose of the access	Personal data category	Location
Cisco	In order for Cisco to be able to provide their services of Webex.	User Information, Host and Usage Information and User Generated Information see section 2.1.	Germany, Netherlands
Cisco Technical Support (TAC) (Including Cisco entities: Cisco Systems Private Limited (India), Cisco - Estarta (Jordan) and Cisco Systems, Inc (USA)).	In addition to the data processed by Cisco to provide the service, other Cisco entities also process data to provide technical support where this is necessary (to provide round the clock support).	User information and Host and Usage Information as detailed in section 2.1, limited to the data indicated as to be collected for Performance, Troubleshooting, and Diagnostic.	Washington DC, USA* Northern Virginia and Oregon USA* Belgium Jordan* The Netherlands

			<p>Bulgaria</p> <p>Poland</p> <p>India*</p> <p>*See section 2.3 for information regarding the transfer mechanism.</p>
Salesforce.com (for TAC)	Salesforce.com are a sub-processor used by Cisco to support Cisco's provision of technical support (TAC).	User information and Host and Usage Information as detailed in section 2.1, limited to the data indicated as to be collected for Performance, Troubleshooting, and Diagnostic.	Washington DC, USA*
CapGemini	CapGemini are a sub-processor used by Cisco to support Cisco's provision of technical support (TAC).	User information and Host and Usage Information as detailed in section 2.1, limited to the data indicated as to be collected for Performance, Troubleshooting, and Diagnostic.	India
Akamai (Sub-processor for Cisco)	Akamai needs to process data to be used as a content delivery network. (CDN) services provider for static content.	<p>IP address, Browser and Geographic region</p> <p>Akamai do not store data but may store IP addresses in logs for a maximum of 3 years.</p>	The location generally maps to where the customer's Webex data is based but IP address data may be transferred to the US with strict access controls and appropriate safeguards under the EU standard contractual clauses (SCCs).
AWS (Sub-processor for Cisco)	AWS cloud infrastructure is used for the following purposes:	Limited Host & Usage Information.	Germany, Netherlands, and Ireland

	<ul style="list-style-type: none"> • To host the Webex signalling service that processes meeting participant UUIIDs, meetings start and end times. • To host Webex media nodes that may process real-time meeting data such as VoIP, video and high frame rate sharing data. This information is not retained in AWS once your meeting has ended. • To host Slido Plug-in data. 		
AWS (sub-processor for TAC services)	Infrastructure for TAC services.	TAC Support Information and Customer Case Attachments.	US
Slido (Cisco Entity)	To provide the Slido service.	User Technical Information, Cookies and (see section 2.1).	Ireland, Germany
Vbrick	Is used as a sub-processor where using the Webex Webinar 5000.	The Name, Unique User ID and the user region to provide the service.	Primary datacentre is in Frankfurt, Germany and with backup in Dublin, Ireland. No content leaves the EEA region.

Data will also be processed internally by staff within the EMA Information Management Division responsible for the administration of the Cisco Webex service to provide end-users' with access to the services. For these purposes internal staff conduct the following processing activities:

- Audio-visual technical support team to provide end-user access to the service, offer technical support, and help troubleshoot.
- Webex Administrators manage and update the service as is necessary.
- Data is processed for diagnostic purposes, to improve services and for troubleshooting purposes (this is limited to User information and Host and Usage Information as detailed in section 2.1).

In instances where there are administrative inquiries and/or disciplinary proceedings, personal data may be shared with:

- The Staff Relations and Support Department
- The Executive Director
- The Disciplinary Board
- The Head of Administration
- Members of the investigating team
- Any persons who might be involved in the processing of personal data in the context of the inquiry or disciplinary proceeding (such as IT staff potentially involved in case evidence in the form of electronic information).

Processing of personal data will be authorised on a strictly need-to-know basis and only specific and relevant information would be extracted and further processed.

For more information on this please see [the privacy statement for administrative inquiries and disciplinary proceedings](#).

4. Your data protection rights

As data subject (i.e. the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Privacy Statement provides information on how EMA collects and uses your personal data. Requests for other information regarding the processing may also be directed to the Internal Controller
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete

- **Right to withdraw consent** – You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn

Please note that if you withdraw your consent, the Agency may not be able to provide certain services to you. EMA will advise you if this is the case at the time you withdraw your consent

- **Right to erasure** – You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the EMA General Privacy Statement, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement
- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation
- **Right to portability** - Where the processing is carried out based on your consent and in automated means you have the right to receive your personal data (which was provided to the EMA directly by you) in a machine-readable format. You may also ask the EMA to directly transfer such data to another controller
- **Right not to be subject to automated decision making** – You have the right to not to be subject to a decision based solely on automated processing if such decision has legal effect on you

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu

Further contact information: www.edps.europa.eu/about-edps/contact_en