



Record of processing activity

Audio – Video Communication and Collaboration Services

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Nr	Item	Description
Part 1 - Article 31 Record		
1	Last update of this record	01/12/2022
2	Reference number	EBA/DPR/2022/16
3	Name and contact details of controller	Controller: European Banking Authority (EBA), Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France Responsible department: Operations, IT Unit Email address: eba-it-dp@eba.europa.eu
4	Contact details of DPO	dpo@eba.europa.eu
5	Name and contact details of joint controller (where applicable)	Not applicable
6	Name and contact details of processor (where applicable)	<ol style="list-style-type: none"> CANCOM online BVBA Rue Montoyer 35 Brussels Belgium Cancom provides Cisco Webex service Microsoft Ireland Operations Limited Microsoft EU Data Protection Officer¹ One Microsoft Place South County Business Park Leopardstown Dublin 18 D18 P521 Ireland Telephone: +353 (1) 706-3117 https://aka.ms/privacyresponse Microsoft provides Microsoft Teams UniSystems Systemes Informatiques Societe Anonyme Comerciale Unipersonnelle

¹ Reference: <https://docs.microsoft.com/en-us/compliance/regulatory/gdpr-data-protection-officer>, accessed 27/07/2021.

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		<p>Rue des Deux Eglises 26,boite 4 B-1000, Bruxelles Belgium</p> <p>UniSystems provides EBA Unit IT contractors</p>
7	Short description and purpose of the processing	<p>The EBA processes personal data within the processing activity of ‘Audio – Video Communication and Collaboration Services’ to provide EBA staff, trainees, contractors and external stakeholders with access to communication and collaboration services (Microsoft (MS) Teams and Cisco Webex).</p> <p>MS Teams is used for communication and collaboration services which include telephone calls, video conferencing, messaging and document sharing. Cisco WebEx is used for video conferencing.</p> <p>Communication and collaboration services allow the organisation to provide services such as telephone calls and instant messaging in a cost effective way and to provide video conferencing services without the need to travel to reach the conference/meeting venue.</p>
8	Description of categories of persons whose data the EBA processes and list of data categories	<p>The EBA processes personal data of the following categories of persons:</p> <ul style="list-style-type: none"> • Internal to the EBA <ul style="list-style-type: none"> • EBA statutory staff (temporary agents and contract agents); • EBA non-statutory staff (Seconded National Experts); • EBA trainees; • EBA contractors. • External to the EBA <ul style="list-style-type: none"> • External stakeholders (e.g. external participants of a call/video conference such as National Competent Authorities (NCA) representatives, candidates, European Supervisory Authorities (ESA) staff, other European Union Institutions Bodies and Agencies (EUI) staff). <p>The EBA processes the following categories of personal data:</p> <ul style="list-style-type: none"> • Identification data (login/username, name, surname, email address, location, picture, telephone number in case of joining a meeting via phone); • IP address; • Content data (recording of audio/video meetings, messages exchanged); • Call history: a detailed history of phone calls made which allows users to go back and review their own call records; • Call quality data: details of meetings and call data are available to system administrators which allow them to diagnose issues related to poor call quality and service usage; • Diagnostic and service data (Microsoft acting as data controller): diagnostic data related to service usage allows Microsoft to deliver the service (troubleshoot, secure and update the product and monitor performance) as well as

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		<p>perform some internal business operations, such as: determine revenue, develop metrics, determine service usage, conduct product and capacity planning;</p> <ul style="list-style-type: none"> • Availability statuses in MS Teams: Available, Busy, Away, Do not disturb, Be right back, Away, Offline. Status is based on information in Microsoft Outlook Calendar and MS teams status (e.g., in a call status). Statuses are synchronised both in MS Teams and in MS Outlook Calendar. When status is set as Away the system shows time of absence and when the last connection has taken place.
9	Time limit for keeping the data	<p>With regards to Microsoft Teams, time limit for keeping the above-mentioned categories of personal data corresponds to the duration of the concerned data subject’s working relationship with the EBA. At the end of the working relationship, and following the exit procedure for leavers, personal data of the data subjects are deleted from the systems. Afterwards, personal data are permanently deleted in the processor’s systems after 30 days.</p> <p>Regarding external stakeholders, call history and relevant personal data are deleted after 30 days, counting from the date the call was placed.</p> <p>With regards to Cisco Webex², time limit for keeping identification data corresponds to the duration of an active contract with Cisco. When the contract terminates, name and unique user identification are retained for seven (7) years as part of Cisco’s business records and are maintained to comply with Cisco’s financial and audit requirements. IP addresses are kept for three (3) years as part of Cisco’s record of Service delivery.</p>
10	Recipients of the data	<p>Recipients of personal data processed within the context of this processing activity are as follows:</p> <ul style="list-style-type: none"> • Internal to the EBA <ul style="list-style-type: none"> • duly authorised IT Unit staff members. • External to the EBA <ul style="list-style-type: none"> • duly authorised IT Unit contractors who sign a confidentiality declaration with the EBA and are subject to the EBA Standard on Access Control and Authentication; service providers such as CANCOM, Microsoft and UniSystems are bound to confidentiality contractual clauses. <p>Access to recordings and/or chats of videoconferences is limited to participants only.</p>
11	Are there any transfers of personal data to third countries or international organisations? If so, to	<p>Microsoft</p> <p>The EBA has entered a contract with Microsoft Ireland Operations Limited under the framework contract DI/076770 between DIGIT, European Commission, and Microsoft.</p>

² Cisco Webex Meetings Privacy Data Sheet

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	which ones and with which safeguards?	<p>Regarding data transfer, at rest data are stored encrypted on a data centre located in the European Union (EU); in transit data are transmitted encrypted and implemented with cryptographic keys.</p> <p>Data transfers may include the following countries: United States of America, United Kingdom, China (P.R.C.), Serbia, India, Israel, Canada, Switzerland, South Africa, United Arab Emirates, Australia, Chile, Brazil, Egypt, Japan, Republic of Korea, Singapore, and Malaysia.</p> <p>Personal data processed may be transferred outside of the EU through Microsoft’s sub processors, for a limited period of time and for service execution purposes, when outside of the EU. A list of Microsoft’s current sub processors is available at https://aka.ms/servicesapprovedsuppliers.</p> <p>Microsoft commits itself, in the proposed Custom Data Processing Agreement (DPA), to have in place written agreements with all sub-processors that are at least as restrictive in terms of data protection and security as their data processing agreement with the EUIs.</p> <p>Due to the nature and the complexity of the service provided by a provider of public cloud services, it is highly unlikely that a set of personal information per individual product/service, processing activity and data category can be obtained for each sub-processor used.</p> <p>WebeX</p> <p>The EBA has entered a contract with CANCOM under the framework contract OC/EFSA/PTT/2015/01 between the consortium “JV CANCOM-PIRONET” and the European Food Safety Authority. The contractor commits itself to process personal data in accordance with Regulation (EU) 2018/1725 (GDPR) and solely for the purposes set out by the Controller.</p> <p>The contractor commits itself to adopt appropriate technical and organisational measures for the processing of personal data including pseudonymisation and encryption of personal data.</p> <p>While using Webex, personal data are processed within the EU/EEA and do not leave that territory, except for analytics data (host and usage information), which are stored in the United States. For more information, please refer to the Cisco WebEx Meetings Privacy Data Sheet.</p> <p>Transfers of personal data to third countries (non-EU/EEA) are based on Standard Contractual Clauses (SCCs).</p>
12	General description of security measures, where possible	<p>Processing of personal data in the context of this processing activity is carried out pursuant to EBA Decision (EBA/DC/138) of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>Processing is performed under the EBA Information Security Framework, published on the EBA intranet. Those security controls</p>

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13	<p>For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:</p>	<p>include: access control and authentication policy and technical controls; backup; audit trails; physical security policy and technical controls; patch management policy; data processing agreements (DPAs) with Cancom, Microsoft and UniSystems.</p> <p>The EBA also requests vendors the ISO 27001 certification, meaning the EBA makes sure that they all have in place information security policies, procedures and guidelines.</p> <p>Data Protection Notice on audio – Video Communication and Collaboration Services</p>