

## PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** ELA meetings through Webex

**Data Controller:** European Labour Authority, Resources Unit, Unit/Sector using Webex services

**Record reference:** DPR-ELA-2023-0005

### Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?

## 1. Introduction

The European Labour Authority (hereafter 'ELA') is committed to protect your personal data and to respect your privacy. ELA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation '*ELA meetings through Webex*' undertaken by the Unit/Sector using Webex services is presented below.

## 2. Why and how do we process your personal data?

Purpose of the processing operation: The Unit/Sector using Webex services collects and uses your personal information to collect and uses your personal information in order to:

- identify of conference host and participants to ensure the normal operation of the service
- identify potential improvements and technical deficiencies of the service
- collect statistics used for service invoicing by the contractor
- collect representative data and conference statistics (excluding content) to improve user experience and service performance by carrying out analyses of aggregated data
- address the technical support request
- analyse the performance of technical support

The organizer of a meeting is always a European Labour staff and when a meeting is organized including both internal or/and external participants a set of parameters need to be used (mainly the email address of each participant).

If a member of the ELA would act as an organizer, he/she needs to create an account on the system.

During the video/audio/chat conference, all participants are able to share content on a voluntary basis and the meeting organizer owns the capacity to record the conference/meeting. This action should be:

- announced to the regular participants prior the recording and
- this processing is under the responsibility of the video/audio conference organizer.

It is recommended to the video/audio conference organizer to create a separate privacy statement for the specific event/meeting and share it with the participants before the video conference is initiated.

Your personal data will not be used for an automated decision-making including profiling.

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, because, according to Article 5(1) of the Regulation (EU) 2018/12725:

- the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

#### Legal basis:

Articles 18(1)g and 36(3) of Regulation (EU) 2019/1149 of the European Parliament and the Council of 20 June 2019 establishing a European Labour Authority ('ELA founding regulation'),

ELA MB Decision 23/2023 Communication Strategy 2023-2026.

In addition, this processing operation for the performance of tasks carried out in the public interest by the Union institutions and bodies includes the processing of personal data necessary for the management and functioning of those institutions and bodies.

This processing of personal data in the context of the WebEx Service is necessary to ensure the proper use and management of ELA resources for ELA Staff to efficiently carrying out their duties by also enabling them communicate with non-ELA stakeholders for work-related purposes. Therefore, it is necessary for ensuring that ELA staff have effective and cost efficient collaboration and communication tools at their disposal to enable them to carry out their duties.

We do not process **special categories of personal data**, therefore Article 10 of the Regulation does not apply.

### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation, the Unit/Sector using Webex services collects the following categories of personal data:

- **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 endpoint (as Applicable), Service Version, Actions Taken, Meeting Session Information (title, 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, Host Name, Screen Resolution, Join Method, Performance, Troubleshooting, and Diagnostics Information.
- **Invoicing information (subset of previous category):** Host Name, Conference URL, Conference Time and Duration, Host Registration Information: Name/Surname, Email Address, Password (hashed version only), Public IP Address, Browser, Phone Number (Optional), Mailing Address (Optional), Avatar (Optional), Billing Information.
- **User-generated Information:** Meeting and Call Recordings (only by Organizer) –optional data, Uploaded Files – optional data.
- **Cisco Technical Assistance Case (TAC) Support Information:** Name/Surname of the Employee Appointed to Open the Service Request, Email address of the Employee Appointed to Open the Service Request, Phone Number of the Employee Appointed to Open the Service Request, Authentication Information (excluding passwords),

Information About the Condition of the System (if applicable), Registry Data About Software Installations and Hardware Configurations (if applicable), Error-Tracking Files (if applicable).

The provision and collection of personal data is mandatory to meet a technical requirement. If you do not provide your personal data (Host Registration/Host Usage/User-generated), possible consequences might be that the system cannot operate properly and therefore, the participation of a user is impossible.

On the other hand missing TAC Support Information might severely impact the efficient technical support the contractor could offer.

The User-generated information, namely the recording and files shared of the conference can be available in two ways:

- Through participation in the conference for its duration. In this case, participants may decide not to share their image or voice.
- By the recording of the conference, which may be activated manually by the organiser.

The chat exchange between participants is never retained after the conference.

The list of participants' names is available for each participant for the duration of the conference, but these names are not a unique identifier. Indeed, they may not correspond to the true names of people in the conference.

#### **5. How long do we keep your personal data?**

The Unit/Sector using Webex services only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- **Host and Usage Information:** 3 years from when the Service is terminated in a pseudonymised format.
- **Invoicing information (subset of previous category):** 7 years maximum
- **Host Registration Information:** 7 years after contract termination OR on User-request by sending a request to [privacy@cisco.com](mailto:privacy@cisco.com) or opening a TAC service request
- **User-generated Information:** Meeting duration (unless recording by the meeting host takes place)
- **TAC Support Information:** Up to 10 years OR on User-request by sending a request to [privacy@cisco.com](mailto:privacy@cisco.com) or opening a TAC service request.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Labour Authority or of its contractors.

ELA's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of ELA, and by the confidentiality obligations deriving directly from the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#).)

In order to protect your personal data, ELA has put in place a number of technical and organisational measures in place. 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.

#### **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to ELA staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

In particular:

Authorised staff of the contract service provider, Cisco System.

All statistical and invoicing data shall be accessible to the Contractor’s authorised staff with full access; this information is available to the ELA upon request.

Data concerning the content of the conference and the list of participants' names are available to all participants during the duration of the conference.

If a local record is activated by the organizer (impossible by the central organizer), it will also possess this information.

The user identifier (email, location, phone, etc.) is accessible only to the organizer of the conference. The organizer’s account data shall be accessible to authorised technical staff directly concerned by the service at the contractor's premises.

The technical support data are available to any contractor engineer assigned to the technical support (TAC); this information is available to the ELA and can be deleted on request. The content of any registration is announced as available only to the organizer and with an alternative password.

The controller will transfer your personal data based on appropriate safeguards (Article 48 of Regulation (EU) 2018/1725).

#### **8. What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller:

[resources@ela.europa.eu](mailto:resources@ela.europa.eu)

### **- The Data Protection Officer (DPO) of ELA**

You may contact the Data Protection Officer ([data-protection@ela.europa.eu](mailto:data-protection@ela.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

ELA Data Protection Officer (DPO) publishes the register of all processing operations on personal data by ELA, which have been documented and notified to him. You may access the register via the following link: <https://www.ela.europa.eu/en/privacy-policy>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-ELA-2023-0005 ELA meetings through Webex.