

PRIVACY NOTICE – Webex (Record reference number: 40)

Use of Cisco Webex for the internal and external communication of the SESAR 3 JU event involves processing of personal data, which shall comply with Regulation (EU) N° 2018/1725¹ (the “Regulation”).

This privacy notice explains how the SESAR 3 JU uses any information you give to us, and the way we protect your privacy. Furthermore, it describes the rights you have as a data subject and how you can exercise these rights. SESAR 3 JU protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data.

We provide the following information based on articles 14 to 16 of the Regulation.

What is the purpose of the processing?

The purpose of the processing activity is the support of the internal and external communication between the SESAR 3 JU staff (calls, meetings, chats) and externals with the use of Webex videoconferencing platform.

More specifically the SESAR 3 JU processes personal data in order to:

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

Which personal data do we process?

- **User information**: Name, Email address, Password, Browser, Phone number (optional), Geographic region, Billing information, User information included in the customer’s active directory (if synched), Unique User ID (UUID)
- **Host and Usage Information**: User Agent Identifier, Hardware Type, Operating System Type and Version, IP addresses along the network path, Mac Address, Geographic Region
- **Meeting Session Information**: Host Name, Meeting Site Url, Meeting Start/End Time, Username Of Attendees, Meeting Start/End Time, Subscription Info, Troubleshooting and Diagnostics Information, Call Attendee Information including Email Addresses, Phone numbers, Meeting host (organizer) and meeting attendee information to be used for billing purposes
- **User-Generated information**: Meeting and call recordings, Transcriptions of call recordings, Uploaded files
- **Cisco Technical Assistance (TAC) information**: Name, email and 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)

¹ Regulation (EU) N° 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (“GDPR”).

Under what legal basis do we process your data?

- Article 5(1)(a) of the Regulation (public interest)
- Council Regulation (EU) 2021/2085 establishing the Joint Undertakings under Horizon Europe²
- Article 5(1)(b) of the Regulation (legal obligation)
- Article 157 of the Council Regulation (EU) 2021/2085 for EUROCONTROL providing IT services and supplies to the SESAR 3 JU

Who is the controller and other actors involved in the processing?

Joint Controllers:

- The SESAR 3 JU, Avenue Cortenbergh 100, 1000 Brussels, Belgium
- EUROCONTROL Rue de la Fusée, 96, B-1130 Brussels, Belgium

Processors:

- Cisco Webex
- Intrado which is the Cisco supplier to EUROCONTROL

How is SESAR 3 JU processing your personal data?

Personal data are processed electronically. The SESAR 3 JU staff member who wishes to organise a meeting via Webex must first submit a request for an account, which is then created by the IT Service Desk of EUROCONTROL when approved, which allows the activity requested to be linked to a responsible person.

The organiser of the meeting will have to create a virtual room and invite external participants according to his/her needs. These invitations will be created using the participant's email address and will allow access to the session.

If users do not provide the personal data mentioned in detail below (User Information/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 Technical Assistance (TAC) Information might severely impact the technical support that EUROCONTROL can offer.

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

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

The chat exchanges between participants are never retained after the termination of the call. The list of participants' names is available for each participant for the duration of the meeting. However, these names are not a unique identifier for each user as they may not correspond to the real names of people in the meeting.

During the video/audio/chat meeting, all participants are able to share content on a voluntary basis and the meeting organizer owns the capacity to locally record the meeting. This action is announced to the participants prior the recording. Recordings may be uploaded in the SESAR 3 JU website.

Personal data are processed both:

- **Automatically:** Information is collected automatically by computer applications by Webex for statistical and billing purposes, without leading to any individual decision relating to the data subjects and

² Council Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe and repealing Regulations (EC) No 219/2007, (EU) No 557/2014, (EU) No 558/2014, (EU) No 559/2014, (EU) No 560/2014, (EU) No 561/2014 and (EU) No 642/2014, the "Single Basic Act", *OJ L 427, 30.11.2021, p. 17–119*

- **Manually:** The organizer of the meeting must identify the participant by a series of personal data (minimum email), the collection of this data being carried out manually by an external means of communication. In addition, the content of the conference and the list of participants' names are also shared among all participants.

The use of the services of the TAC (Technical Assistant Center) also uses manual methods for data entry. In case of technical problems with Webex video conferences, it is possible that the EUROCONTROL service providers will require the logs in order to investigate and solve the issue.

Webex is also used for some of the SESAR 3 JU's online conferences, events and webinars. More information regarding this processing activity is available in record number 17 titled: "*Webinars and online events conducted via web conferencing platforms*" published in the [SESAR 3 JU register of data processing operations](#) and the [relevant privacy notice](#).

See <https://www.sesarju.eu/dataprotection> for more information.

How do we protect and safeguard your information?

- Staff dealing with this processing operation is designated on a need-to-know basis
- Access control and technical measures such as physical locks and/or secure connections and firewalls
- Standard clause for the processing of personal data included in the contract
- Appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature of the personal data concerned
- Secure transfer of data
- Secure communication channel between server and client
- Back-ups, update and monitoring services as well as corrective and periodic maintenances

Who can access your personal data and to whom is it disclosed?

- Designated SESAR 3 JU staff members: The main recipient is the meeting's organiser who should invite all internal and/or external participants. The organiser, by service definition, is part of SESAR 3 JU Staff. Participants are recipients as well, of all the contents of the meeting during the duration of the session
- All statistical and billing data are accessible to authorized personnel of EUROCONTROL with full access; this information is available to the SESAR 3 JU on request. Data concerning the content of the conference and the list of participants' names are accessible to all participants during the duration of the conference. The user identifier (email, location, telephone, etc.) is only accessible to the conference organizer. The organizer's account data is accessible to authorized technical staff directly of Webex. Technical support data is available to any person assigned to technical support (TAC); This information is available to the SESAR 3 JU and can be deleted on request.

What are your rights and how can you exercise them?

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. In addition, you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on you, except for certain situations, such as entering into a contract (as required by articles 14-16 & 24 of the Regulation).

Information on action taken on the data subject's request to exercise her/his rights shall be provided without undue delay and in any case within one month of receipt of the request. In case of complex or voluminous requests, this period may be extended by another two months, in which case the SESAR 3 JU will inform the data subject.

The content of these rights is detailed in the [Data Protection Notice page in SESAR 3 JU website](#) which contains also information about the contact points and recourse (including EDPS <http://www.edps.europa.eu> and edps@edps.europa.eu, and SESAR 3 JU DPO SESAR_3_JU.dataprotection@sesarju.eu) as well as detailed information on the exercise of the rights.

In accordance with Article 25(1) of [Regulation \(EU\) 2018/1725](#) restrictions of data subjects' rights may be provided for by internal rules adopted at the highest level of management of the SESAR 3 JU, i.e. the Governing Board. The SESAR 3 JU Governing Board with its Decision GB(D)06-2021 laid down the internal rules concerning the restrictions of certain rights of data subjects in the framework of the functioning of the SESAR 3 JU. The Decision is publicly available in the [Official Journal](#) in all the EU official languages.

How long is the data retained?

- Name and Unique User ID are kept for 7 years from contract termination.
- User Generated Information are deleted within 60 days from when the service is terminated.
- Host and Usage information is kept for 3 years following termination of service in pseudo-anonymized form in order to maintain record of service delivery.
- Technical Assistance (TAC) information are stored for up to 10 years.
- The content of the video/audio conference (documents, links, files etc.) will be deleted after the termination of the session, unless they are downloaded/saved by the meeting organizer or a specific recording of the meeting takes place. The chat messages exchanged among participants during a meeting are deleted after the meeting/session is ended/terminated.
- When EUROCONTROL service providers require the logs in order to investigate and solve a technical problem, the logs are kept until such technical problem is resolved.

Complaints, concerns and recourse

Should you have any complaint or concern you may contact:

- the Data Protection Officer of the SESAR 3 JU: sju.data-protection@sesarju.eu and
- the ICT team at: ict-coordination@sesarju.eu and/ or
- Cisco Webex at: privacy@cisco.com

As a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO: European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

For more information on the EDPS, please consult their website: <https://edps.europa.eu>

Additional information

More information on Data Protection at the SESAR 3 JU can be obtained in the [SESAR 3 JU register of data processing operations](#) and in the privacy notices published in the SESAR 3 JU website. This privacy notice will be included in the invitations of all Webex meetings.