

RECORD OF PROCESSING ACTIVITIES

CISCO WEBEX

1. PROCESSING PARTIES

1.1 CONTROLLER NAME

Authority for Anti-Money Laundering Authority and
Countering the Financing of Terrorism (AMLA)
MesseTurm
Friedrich-Ebert-Anlage 49
60308 Frankfurt am Main
Germany.

RESPONSIBLE UNIT

Digital, ICT & database.
ict-support@amla.europa.eu

1.2 DATA PROTECTION OFFICER name

DPO

CONTACT DETAILS

dpo@amla.europa.eu .

1.3 PROCESSOR NAME (IF APPLICABLE)

Cisco Systems Inc.

CONTACT DETAILS

webexeurope@cisco.com.

1.4 JOINT CONTROLLERS NAME (IF APPLICABLE)

N/a

CONTACT DETAILS

2. PROCESSING ACTIVITY

2.1 NAME OF THE ACTIVITY

Conferencing services with Cisco Webex.

2.2 PURPOSE OF THE PROCESSING OF PERSONAL DATA

The purpose of use of the Webex SaaS (Cisco Webex Meetings, Cisco Webex App) and the subsequent collection and storage of personal data is to provide the web conferencing and interactive collaboration functionalities, including the assistance of meetings administration, recording and registration of participants, staff for collaboration with internal and external counterparts.

2.3 OTHER PURPOSES

[Click or tap here to enter text.](#)

2.4 LEGAL BASIS

Choose applicable as per Article 5(1) of Reg. (EU) 2018/1725:

Check
(YES/NO)

Art. 5(1)(a) For the performance of a task carried out in public interest or under AMLA Regulation

/

Please name the task:

Facilitate internal and external communications.
Facilitate and improve

		cooperation between the Authority and relevant stakeholders. Art.5g Regulation. In particular, the processing is necessary “for the management and functioning” of the EDPS (Recital 22 of the Regulation)
Art. 5(1)(b) For complying with a legal obligation upon the Unit/Authority	X/□	Please specify the legal obligation:
Art. 5(1)(c) For contractual reasons of the Data Subject	□/□	Click or tap here to enter text.
Art. 5(1)(d) The Data Subject has given consent for one (or more) purposes as listed above	□/□	Please explain how the consent is gathered: Click or tap here to enter text.
Art. 5(1)(e) For protecting the vital interests of the data subject	□/ X	Please specify: Click or tap here to enter text.

2.5 NECESSITY OF THE PROCESSING OF PERSONAL DATA

[Click or tap here to enter text.](#)

2.6 DATA SUBJECTS

Staff (TA/CA)

SNEs

Trainees

Outsourced personnel

Member States/ Competent authorities contacts

Other contacts (please specify) [Suppliers, contractors or service providers.](#)

Other (please specify) [Persons wishing to participate in public hearings, invested stake holders, representatives of obliged entities, members of academia, etc..](#)

2.7 CATEGORIES OF PERSONAL DATA

Name

Surname

Communication Data (Email Account, Telephone Number, Address Work or Personal - please specify) [Email Account, IP address. Meeting title and duration, time a user joined or left, technical performance information, type of device, audio/video feed of the participants \(no data is being saved\). Real-time meeting data: VoIP, video and high frame rate sharing data \[transient processing\].](#)

[Host and Usage Information: IP address, user agent identifier, hardware type, meeting session information.](#)

[Registration information: Account data \(user name, email, profile settings\).](#)

[The list of participants' names is available \(as encoded by the participants\) for each participant for the duration of the conference.](#)

[User Generated Information: Meeting/call recordings, if applicable. Action announced to the participants prior to the recording.](#)

[Technical Support Contact \(TAC\) Support Information: Contact information of ICT technical staff working on the](#)

provision of the services. The state of the EP WebEx instance is associated with the ICT technical staff contact information at support ticket creation.

Title, Function (please specify) For the case of NCAs, Country

Location

2.8 DATA RETENTION

<i>Data category</i>	<i>Time limit</i>
Meeting recording	15 days to ensure preparation of meeting notes.
Sent Meeting invitations – email accounts	Manual deletion to be performed yearly. The invitation details are placed on the calendar of the participant and cannot be deleted by the controller. That action can only be triggered by the data subject
Meeting content	Meeting content (chat, shared content, etc.) are purged after the meeting. Video feeds of the participants during the meetings are not being stored. Transcriptions and video recordings manual deletion to be performed yearly.
Data related to meeting connections.	Full data (related to meeting connections) retained for 13 months on the Cisco cloud. Limited data stored for billing purposes on Cisco cloud for 6 years.

3. DISCLOSURE OF PERSONAL DATA - RECIPIENTS WHERE PERSONAL DATA IS DISCLOSED

3.1 INTERNAL UNITS

(Please list all internal entities to whom the data will be disclosed):

All internal units have access to the contact details of participants in the meetings in which they take part or organise.

3.2 MEMBER STATES AUTHORITIES OR THIRD PARTIES (i.e.: private sector) WITHIN THE EU

All participants in meetings may have access to the list of other participants, through the invitation – on the persons and entities who have been asked to participate.

3.3 THIRD COUNTRIES AND/OR INTERNATIONAL ORGANISATIONS

(If this is the case, please document the additional safeguards in compliance with Art. 48 of the DPR):

YES – USA

Safeguards: US Privacy Framework applies – CISCO is a registered company. In addition, there are existing SCCs negotiated by the European Commission and BCRs - <https://www.cisco.com/c/en/us/about/trust-center/data-protection-and-privacy-policy.html>

4. PRIVACY STATEMENT/ DATA PROTECTION NOTICE

FOR MORE INFORMATION INCLUDING HOW TO EXERCISE YOUR RIGHTS TO ACCESS, RECTIFICATION, OBJECT

4.1 Please insert a link if available, or the text of the Privacy Statement:

[Cisco Online Privacy Statement Summary - Cisco](#)
[Cisco Webex Meetings Privacy Data Sheet](#)
https://www.aml.europa.eu/document/download/4b7b3b56-adb2-4789-a4ab-546f1a2a3667_en?filename=5%20-%20Public%20Hearings%20-%20Privacy%20Statement.pdf

AND DATA PORTABILITY (WHERE APPLICABLE).
FOR DRAFTING OF THE PRIVACY STATEMENT, PLEASE FOLLOW ART. 15-16 OF THE DPR.

4.2 **Please explain how you intend to provide the Privacy Statement to the Data Subjects (i.e. via email, teams, Website, etc.):**

[Link to AMLA's website in the invitation.](#) Privacy Notice in the registration template.

5. DATA SECURITY

5.1 ORGANISATIONAL MEASURES

[Click or tap here to enter text.](#)

5.2 TECHNICAL MEASURES

	Check (YES/NO)	Description (if YES)
Pseudonymisation or Encryption	<input type="checkbox"/> /X	Click or tap here to enter text.
Measures to ensure:		
– Confidentiality of Data	X/ <input type="checkbox"/>	Invitations transmitted using TLS/HTTPS encryption. Meeting invitations include by default the names of other persons invited, and during a meeting the participants can see the login name of other participants unless the host limits the view participants access.
– Integrity of Data	X/ <input type="checkbox"/>	Invitations sent from AMLA using contacts database.
– Availability of Data	X/ <input type="checkbox"/>	Click or tap here to enter text.
Resilience of Systems and Services	<input type="checkbox"/> / <input type="checkbox"/>	Click or tap here to enter text.
Restoration of availability and access to Personal Data in a timely manner	<input type="checkbox"/> / <input type="checkbox"/>	Click or tap here to enter text.
Process for testing, assessing and evaluation of the effectiveness the measures	<input type="checkbox"/> / <input type="checkbox"/>	Click or tap here to enter text.