

The background features a vibrant, abstract design with a color gradient from dark blue on the left to bright yellow and white on the right. The design consists of overlapping, wavy horizontal bands and a radial pattern of lines emanating from a bright white point on the right side, creating a sense of motion and energy.

CISCO *Live!*

Let's go



The bridge to possible

Cisco Webex and GDPR

Thomas Flambeaux, Cisco Webex privacy consultant
tflambea@cisco.com

Data Protection officer certified: CIPP-E, DP Institute and PECB
IAPP Fellow of Information Privacy

Abstract

- In this session, we will first get a quick refresh on the general data protection regulation (GDPR) latest developments (Data privacy framework)
- We will then cover in detail what Cisco Webex offers to achieve GDPR compliance in terms of data localization and migration, privacy features, processes, privacy engineering , sovereign controls and certifications.
- The objective of this session is for attendees to get comfortable deploying Cisco Webex solutions when it comes to their obligations towards GDPR.

Agenda

- Data Protection in Europe
- Cisco Webex latest achievements
- Cisco Webex Privacy assets
- Conclusion

Data protection in Europe

General Data Protection Regulation

July 2020: The EU-US Privacy Shield is **invalidated** by the European Court of Justice.

Spring 2021: The European Data Protection Board (EDPB) publishes guidelines: **localization, transparency, certifications** and **technical safeguards** (shorter retention, encryption...) are required to transfer data to the United States

July 2023: The data protection framework between the US and the EU has received an **adequacy decision**, but Max Schrems announced he will take the case to court again.... **hence the importance of the EDPB guidelines**



Cybersecurity certification scheme for Cloud Service : EUCS

Basic



Substantial



High and
High+



2024: final scheme adoption / 2025: first certificate issued / 2027: national scheme go away

Cisco Webex latest achievements

EU Cloud Code of Conduct level 3



- [Cisco Webex meetings, messaging and calling are certified Level 3, first collaboration platform to achieve this !](#)
- GDPR encourages code of conduct (Art. 40 GDPR) for specific sectors
- 80+ controls : contractual obligations, sub processors, transfers, audits, security measures, subject rights, breaches, staff privacy training ...[to comply with GDPR art 28 requirements](#)
- First code approved by EDPB and the European commission, in 2021
- Data transfer module being developed

European court of justice usage of webex approved



EUROPEAN DATA PROTECTION SUPERVISOR

Home About Data Protection Press & Publications

> Data Protection > Our work > EDPS Decision on the CJEU's use of Cisco Webex video and conferencing tools

EDPS Decision on the CJEU's use of Cisco Webex video and conferencing tools [Translate this page](#)

13 Jul 2023

EDPS Decision on the CJEU's use of Cisco Webex video and conferencing tools **Authorisation Decisions for Transfers**

In its Decision published on 13 July 2023, the EDPS finds that the use of Cisco Webex videoconferencing and related services by the Court of Justice of the European Union (the Court) meets the data protection standards under Regulation 2018/1725 applicable to EU institutions, bodies, offices and agencies.

First and only videoconferencing solution to get European Data Protection Supervisor blessing for use by EU Court of Justice

EUCJ Webex usage approval



Cisco Webex Safeguards highlighted by EDPS

- All core services and sub-Processors within the EU
- All data encrypted in transit and at rest
- No 3rd party access for support, only Cisco TAC
- E2E for meetings confidentiality

Court tuning of the service

- Single sign-on , global distributed meeting OFF, no personal data in room names, VOIP only for audio
- Cisco TAC : Court support only engages, during European working hours, few “exceptions” (to Cisco TAC level 3 outside the EU)

EDPS finds that there is a public interest of ensuring management and functioning of the Court: ...

TAC is a quintessential element for proper functioning of videoconferencing that in turn is indispensable to the daily functioning of the EUCJ and for staff members working from home

Berlin Free University



- 4500 employees, 38 000 students
- Berlin Data protection authority asked controllers based in Berlin storing personal data in the US to transfer them to Europe instead on July 17th, 2020, and has been always pushing for european or open-source alternatives
- Berlin data protection authority highlighted that no user personal data is disclosed to companies that were not approved as processor and that all services run in EU

Webex with Sovereign Controls (H1CY24)

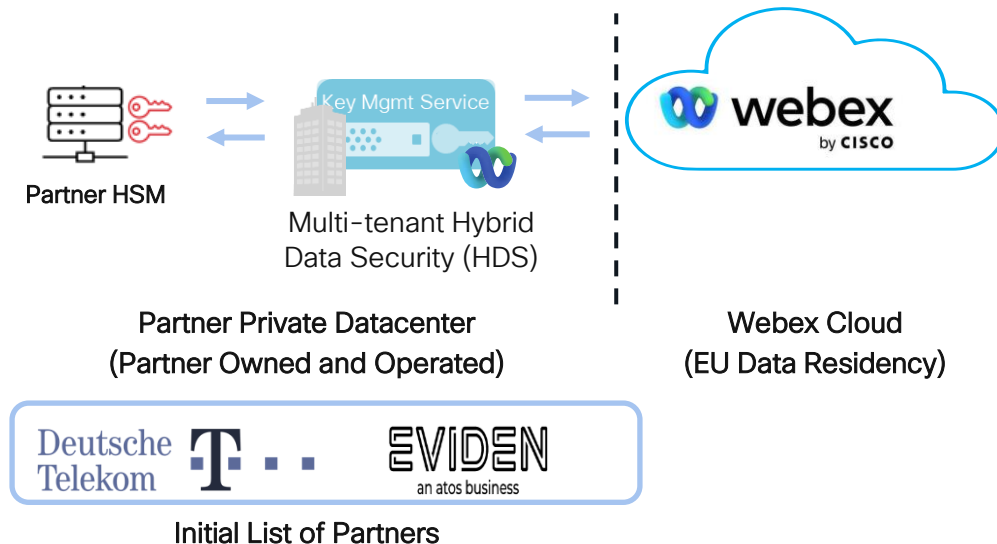


About the **encryption of user content**

Recordings and transcripts ,files and messages, voicemails.

Another option with regards to key management, **here managed by local trusted EU partners**

Local technical support



For more details, see **Helping Webex customers on their path to sovereignty-PSOCOL-1745**

Webex with sovereign controls



“Webex commits to deliver cloud solutions that meet evolving European privacy and security requirements”, said Javed Khan, senior VP of Cisco Collaboration. **“It paves the way for future sovereignty solutions for Government, highly-regulated industries, and the upcoming EUCS certification scheme.”**

More details with **Helping Webex customers on their path to sovereignty-PSOCOL-1745**

Cisco Webex privacy assets

Cisco Webex and Supplementary Safeguards

Aligned with EDPB guidelines (spring 2021) and included in our Customer Data Protection Agreement:

Localization

Transparency

Certifications

Technical safeguards

Localization: Webex Data Residency

All European customers data stored and processed in the European Union (Frankfurt and Amsterdam) since October 2022

- Analytics, Identity, Content, keys, billing
- Meetings, messaging ,calling and contact center
- Exceptions : Cisco TAC, attendee outside regions, optional features
- Migration programs (Identity in progress,next will be content)
- Localization and migration programs also in other regions :Canada and middle east



Localization: In Meeting Traffic (media)

Private meeting on video mesh

- Media kept on-premise, signaling to cloud
- Can cascade among nodes
- **Only scheduled meetings**

Disable Global Distributed meeting

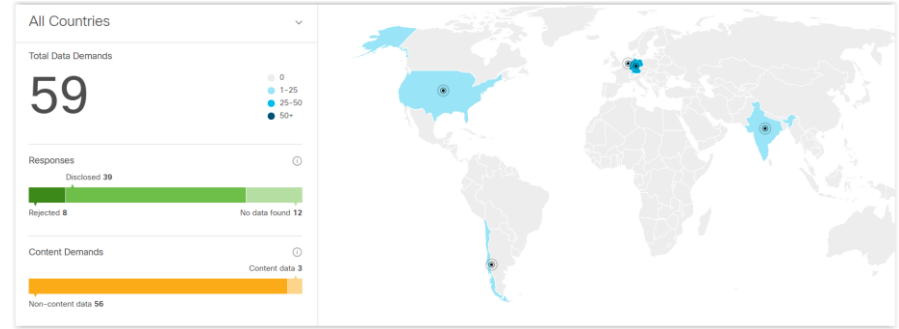
On request (Webex Customer success team)

No overflow to other regions possible if EU servers reach full capacity !



Transparency: Cisco Reports and Principles

- Every 6 months since 2014!
- **Notifies** customer unless applicable law prohibits it, challenges requests that prohibit notification
- **Challenges any** request that would put Cisco in breach of privacy laws in another country except if disclosing data will prevent imminent death or serious physical harm to an individual.



July 1-December 31, 2022	Total	% Disclosed
Content Demands Received	3	0%
Non-Content Demands Received	55 ²	71%
Emergency Demands Received	1	0%

Transparency: Trust packages

ISO certifications, SOC 2 Type 2 report, Letter of attestation for pen tests, security white paper, Privacy Data Sheet

Privacy data sheets (since early 2018)

- **Personal data : collection, retention, security....**
- Subject rights, transfers, certifications

Standard questionnaires

- **SIG-CAIQ** covering all relevant controls or domains: risk management, app and device security ,network security, mobile management, privacy, physical security, audit....



Privacy by design, dedicated Cisco teams

Webex Meetings does not:

- Produce decisions that would result in legal or other significant effects impacting the rights of data subjects based solely by automated means.
- Sell your personal data.
- Serve advertisements on our platform.
- Track your usage or content for advertising purposes.
- Monitor or interfere with you your meeting traffic or content.
- Monitor or track user geolocation.



Pseudonymization

Certifications (EU relevant ones)

ISO 27001/27017-018 /27701 as well as C5 and SOC 2 Type II for Webex Meetings-Messaging-Calling and Contact center



Swiss digital trust for the Webex suite



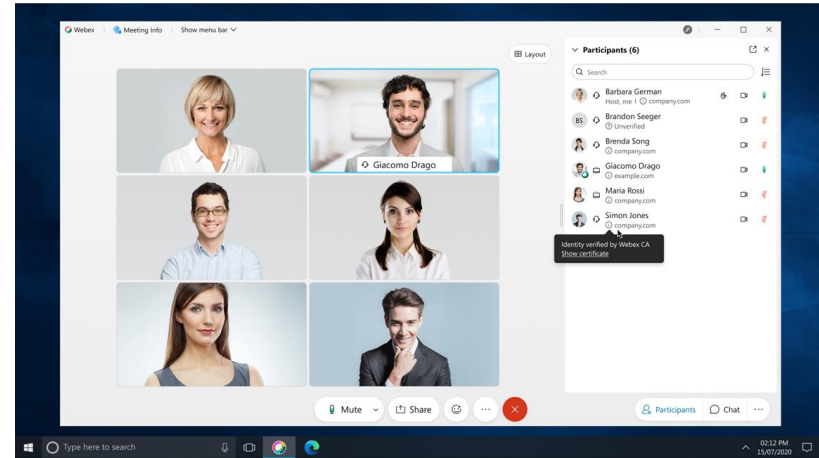
ENS (Spain)-AGID (Italy) and Cloud Code of conduct for Webex meetings-Messaging and Calling



End to End Encryption for Meetings



- Not enabled by default ,Up to 1000 attendees
- **Webex cannot decipher in meeting traffic**
- Key generated on the device and rotating when user join/leave
- **Support Webex video endpoints**, face and gesture recognition, background noise removal, proximity pairing, Linux...
- Coming support for 1-1 calls (App and devices)
- More details with **Securing Webex Meetings- BRKCOL-2876**

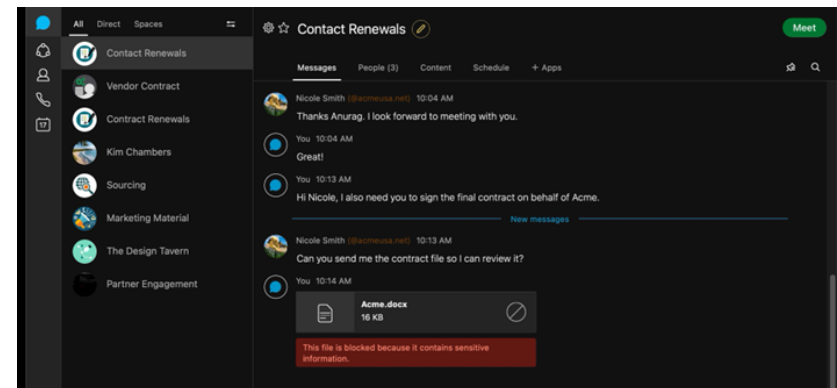


Single Sign-on (SSO) and Events APIs



Stronger authentication with SSO

- **Multi-factor authentication**
- Restricted set of devices
- Restricted access from corporate network
- More details with **Authentication, Authorization and Provisioning for Cisco Collaboration - BRKCOL-2007**



- Events APIs for messaging
- **Monitor and correct user behavior**, preventing the loss of sensitive data
- **Real time inspection for files with Cloudlock**

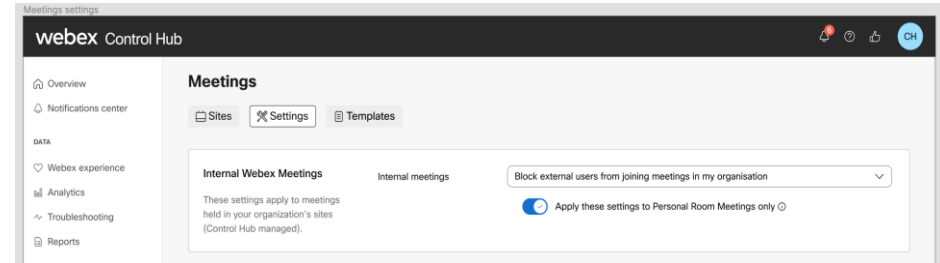
Meeting Access Controls



INTERNAL MEETINGS

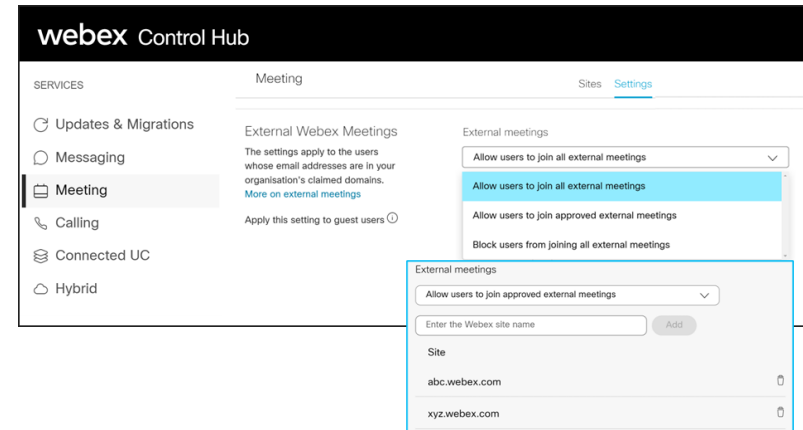
Option 1: No external users can join
(Personal Room / scheduled meetings)

Option 2: External users cannot join PMR
but can join scheduled meetings



EXTERNAL MEETINGS

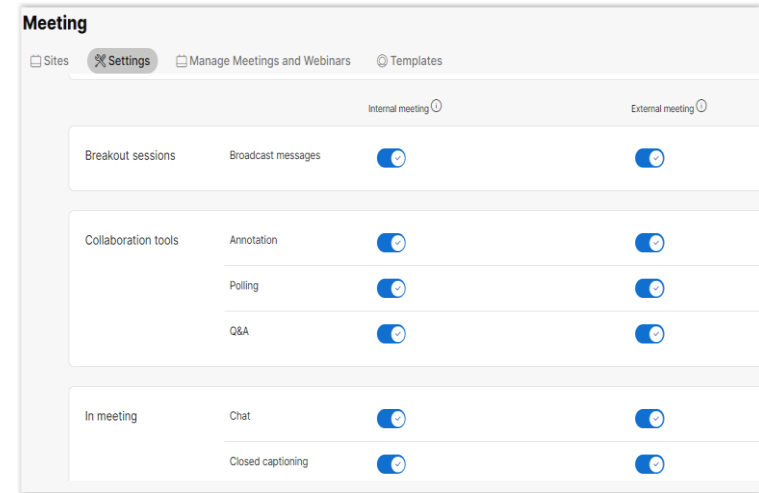
These controls can be applied to all users , groups
(templates) or individual user



Collaboration Restrictions for employees



- **Control user's experience** (20+ features toggles) for external or internal meetings for org/group/users
- **Users joining external meeting will be notified** if policy applies
- Use of personal email? Guests? **Add a token (containing Org ID) to company devices** so that restrictions apply anyway

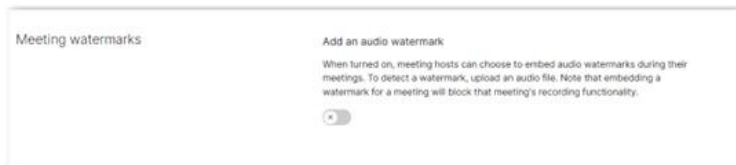
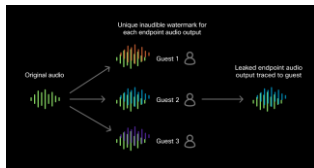


Watermarking



AUDIO WATERMARKING

- Encoded audio signal with unique inaudible identifiers for each participant, **so leaked recordings can be traced back to the source.**
- Option when scheduling, supports E2E meetings.
- Upload the media file (90 sec minimum) to Control Hub (**self-serve**) and see the source: meeting, participant, and device thanks to this tagging. Only for recordings hosted by the organization.



VIDEO WATERMARKING

- Shows attendee name and email for both shared content and video (**authenticated users**)
- **Enforced for all meetings** or set at scheduling, host can also use it for a portion of the meeting, supports E2E meetings
- Recordings disabled by default, if turned on those will not display watermarks



Sign-in/Out activity in Control Hub



- User Sign-in/Out activity information across all Webex apps based on Webex identity
- For both users and admins
- APIs were already publicly available
- To detect suspicious activities
- Requires Pro Pack license

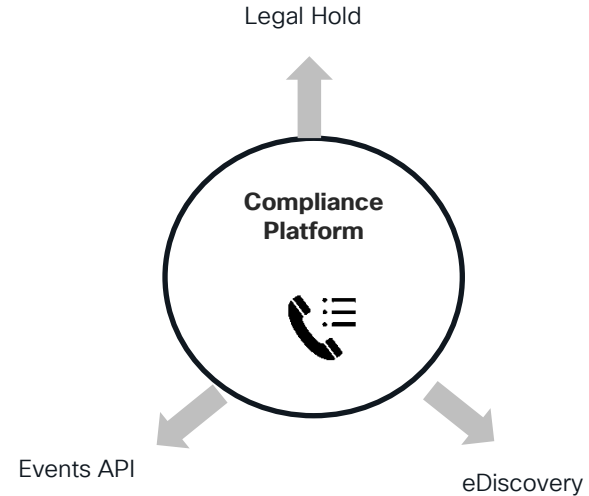
The screenshot shows the 'Security & Compliance' section of the Cisco Control Hub. The left sidebar contains navigation links: Overview, Alerts center, WORKSPACES, Analytics, Troubleshooting, Reports, MANAGEMENT (Users, Groups, Locations, Workspaces, Devices, Apps, Account), Security & Compliance (selected), and Organization settings. The main content area is titled 'Security & Compliance' and includes tabs for Authentication, Compliance and Audit (selected), and Settings. Below the tabs are links for Sign in activities, Watermark analysis, eDiscovery, and Admin activities. A search bar is present with the text 'Search the email, IP address, or device ID' and a count of '123 records'. There is also a 'Filter' dropdown, a time range selector set to '7 days' from '02/07/2023' to '02/13/2023', and an 'Export as CSV' button. The table below lists individual sign-in/out events with columns for Status, Time, Performed by, Application, IP address, Location, Conditional access, and Authentication.

Status	Time	Performed by	Application	IP address	Location	Conditional access	Authentication
Failure	02/13/2023 06:49 AM	kush.dahandok@e...	Webex App	64.294.55.204	Osaka, Japan	Not applied	Single factor
Failure	02/13/2023 06:49 AM	kush.dahandok@e...	Webex App	64.294.55.204	Osaka, Japan	Not applied	Single factor
Failure	02/13/2023 06:48 AM	kush.dahandok@e...	Webex App	64.294.55.204	Tokyo, Japan	Not applied	Single factor
Success	02/13/2023 06:47 AM	Nicole Winston	Control Hub	64.294.55.204	California, US	Applied	DUO auto
Success	02/13/2023 06:47 AM	Britney Smith	Contact center	64.294.55.204	Toronto, Canada	Not applied	Single factor
Failure	02/13/2023 06:47 AM	kush.dahandok@e...	Control Hub	64.294.55.204	California, US	Not applied	Single factor
Success	02/13/2023 06:46 AM	Howl Allison	Webex App	64.294.55.204	California, US	Not applied	Single factor
Success	02/13/2023 06:46 AM	Harsh Desai	Webex Meeting	64.294.55.204	Dallas, US	Applied	DUO auto
Success	02/13/2023 06:46 AM	Peter Kim	Webex App	64.294.55.204	New York, US	Not applied	Single factor
Success	02/13/2023 06:46 AM	Eric Lou	Webex Meeting	64.294.55.204	Toronto, Canada	Not applied	Single factor
Success	02/13/2023 06:45 AM	Bruce Lee	Webex Meeting	64.294.55.204	Shanghai, China	Not applied	Single factor

Calling call records compliance support

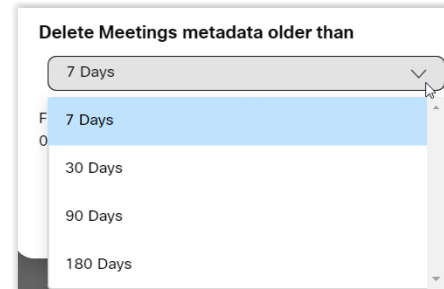
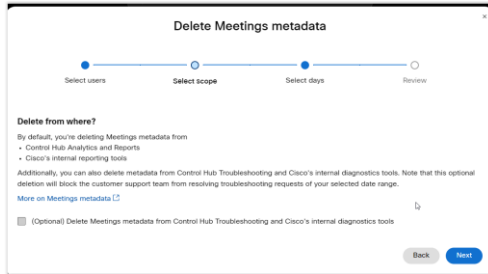
NEW

- **Legal Hold**: Investigated employee records can be preserved and not purged by the retention policy
- **eDiscovery** supported
- 3rd Party Archival Integration via **APIS** to comply with regulatory or corporate compliance



Privacy: Host and usage information deletion

- About metadata (no E2E encryption), not about user account or content
- Must be a full administrator of the organization, 13 months retention by default
- About users with an account. If a host , all records (including about attendees) will be deleted, if an attendee only this attendee records will be deleted
- **NEXT** :Custom retention policy (meetings) and ability extended to messaging and calling metadata



Aligned with EDPB guidelines and offering here more controls for data subject requests

Conclusion

Cisco Webex and GDPR



Technical features, certifications, localization and transparency : fully aligned with EDPB guidelines

Webex sovereign controls pave the way for future sovereignty solutions for Government, highly-regulated industries, and the upcoming EUCS certification scheme.” (Javed Khan, senior VP of Cisco Collaboration)

Resources

Cisco Privacy benchmark

Key findings of the 2023 report

Privacy's Growing Importance and Impact

Cisco 2023
Data Privacy Benchmark Study

- Privacy is an attractive investment for organizations , delivering higher average benefits across the board, and a strong **1.8 times return on investment**.
- 98% of respondents reporting privacy metrics to their Board of Directors and 95% saying “all of their employees” need to know how to protect data privacy.
- Organizations are recognizing that **global providers**, operating at scale, **can better protect their data compared to local providers**.

References

- Webex localization <https://blog.webex.com/hybrid-work/webex-strengthens-eu-data-residency/>
- Data deletion <https://help.webex.com/en-us/article/l4pqoi/Delete-Webex-Meetings-host-and-usage-information-of-users-in-Control-Hub>
- Data migration <https://help.webex.com/en-us/article/2d73oy/Migrate-your-organization%E2%80%99s-Webex-data-to-the-European-Union-data-center-inControl-Hub>
- Audio watermarking <https://blog.webex.com/hybrid-work/webex-audio-watermarking/>
- Cisco Vulnerability policy https://sec.cloudapps.cisco.com/security/center/resources/security_vulnerability_policy.html
- Cisco Webex AI and privacy <https://blog.webex.com/workplace-transformation/webex-advanced-collaboration-features/>
- EDPS approval of webex for EU court of Justice https://edps.europa.eu/data-protection/our-work/publications/authorisation-decisions-transfers/2023-07-13-edps-cjeus-use-cisco-webex-video-and-conferencing-tools_en
- Berlin Free University and webex https://www.fu-berlin.de/presse/informationen/fup/2023/fup_23_268-webex/index.html
- Cisco responsible AI principles https://www.cisco.com/c/dam/en_us/about/doing_business/trust-center/docs/cisco-responsible-artificial-intelligence-principles.pdf
- Swiss digital trust https://digitaltrust-label.swiss/wp-content/uploads/2023/02/Tresorit_DigitalTrustLabel_Certificate-05.12.2022.pdf

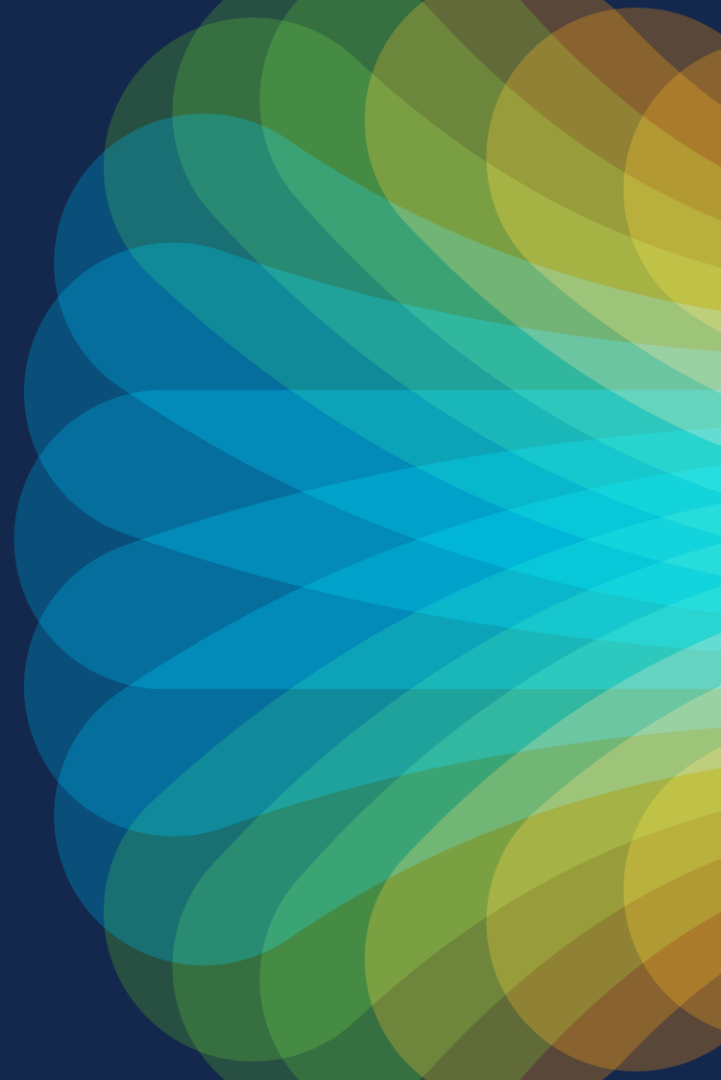
- Cisco principles for data access https://www.cisco.com/c/dam/en_us/about/doing_business/trust-center/docs/cisco-principled-approach-to-government-requests-for-data.pdf
- Cisco Transparency https://www.cisco.com/c/m/en_us/about/trust-center/transparency-report.html#/
- Cisco Webex EU cloud code of conduct level 3 <https://eucoc.cloud/en/detail/press-release-webex-by-cisco-upgrades-its-eu-cloud-coc-adherence-to-level-3>
- MLS vetted <https://hal.laas.fr/INRIA/hal-02425229>
- Saudi Data centers <https://www.decypha.com/en/news/details/Cisco-to-establish-data-centers-in-Saudi-Arabia/21378071?TSID=&EDT=&L=EN>
- EDPB guidelines post SCHREMS II ruling https://edpb.europa.eu/our-work-tools/our-documents/recommendations/recommendations-012020-measures-supplement-transfer_en
- Sovereign controls <https://news-blogs.cisco.com/emea/2023/10/11/sovereign-controls-webex-europe-eviden-deutschetelekom/>
- Cisco Privacy benchmark <https://www.cisco.com/c/en/us/about/trust-center/data-privacy-benchmark-study.html>



The bridge to possible

Thank you

CISCO *Live!*



The background of the slide is a vibrant, abstract graphic. It features a large, stylized cloud shape on the left side, composed of overlapping, semi-transparent bands of color in shades of red, orange, yellow, and green. To the right of the cloud, a bright, multi-colored sunburst or starburst pattern radiates outwards, with colors transitioning from yellow and orange in the center to blue and green towards the edges. The overall effect is energetic and colorful.

cisco *Live!*

Let's go