

Cedefop record of processing activity

Record of Cedefop activities processing personal data, based on Article 31 of 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, and repealing Regulation (EC) No. 45/2001 and Decision 1247/2002/EC.

Nr.	Item	Description
Voice-video calling and instant messaging using MS Teams		
1.	Last update of this record	28/03/2023
2.	Reference number	CDFNOT088 – Voice-video calling and instant messaging using MS Teams
3.	Name and contact details of controller	<p>Cedefop – European Centre for the Development of Vocational Training</p> <p>Postal address: Cedefop Service Post, Europe 123, 570 01 Themi, Thessaloniki, GREECE</p> <p>Telephone: (+30) 2310-490111</p> <p>Email: info@cedefop.europa.eu</p> <p>Responsible department: Head of Department for Resources and Support (DRS) - Information and communication technologies (ICT)</p> <p>Functional email address for enquiries on processing of personal data: ict-service@cedefop.europa.eu</p>
4.	Name and contact details of DPO	data-protection-officer@cedefop.europa.eu
5.	Name and contact details of joint controller (where applicable)	N/A
6.	Name and contact details of processor	<ul style="list-style-type: none"> Cedefop ICT staff (statutory and contractors staff) who provide, manage and support the online MS Teams and SharePoint users; Subprocessor Microsoft Ireland (M365 online) is providing the MS Teams platform. As regards the use of Microsoft Teams: BECHTLE BRUSSELS, under specific contract with Cedefop, in the context of European Commission DG DIGIT contract DI-7720 Software for innovation, diversity & evolution (SIDE II); Any person with a Cedefop account, as call/meeting organiser, process personal information in that they can access attendance report, chat transcript etc.;

		<ul style="list-style-type: none"> • Designated Cedefop staff members with corresponding permissions can record meetings;
7.	Very short description and purpose of the processing	<p>The purpose of the processing operation is to support internal communications by allowing collaboration (calls, meetings, chats) between Cedefop staff, Commission staff, and externals such as staff of other Agencies, contractors, researchers and external business contacts.</p> <ul style="list-style-type: none"> • If recording is needed for a Teams meeting and agreed by participants, the organiser should obtain permissions from Cedefop's ICT; • Recording of Teams meetings (only available for designated staff members with corresponding permissions); • Meeting recordings are made available to meeting participants in the Teams chat (meeting organisers can modify sharing permissions for a specific recording); • Recording of audio/video calls (vs. Teams meetings) is disabled by default. <p>Cedefop carried out a Data Protection Impact Assessment (DPIA) for the use of the M365 platform in Cedefop¹. See also: Microsoft 365 Documents, Records management and Collaboration</p>
8.	Description of categories of persons whose data Cedefop processes and list of data categories	<p>Data subjects: Cedefop staff, external collaborators, contractors and participants in Cedefop MS Teams meetings.</p> <p>Categories of personal data processed:</p> <ul style="list-style-type: none"> • Profile data²: Cedefop's user data from Active Directory (e.g. first name, last name, e-mail address, title, department, office no., phone number); • Content: meetings participated in, conversations chats, call/video recordings etc.; • Call history: calls made, name of person, type, duration, date; • Call quality data: available to system administrators; • Diagnostic and service data Diagnostic data related to service usage;

¹ RB(2022)00117 - Data Protection Impact Assessment(DPIA) for the Microsoft 365 (M365) platform at Cedefop (23 February 2022)

² Described in CDFNOT001 Computer Access accounts

		<ul style="list-style-type: none"> Recording of meetings (only when activated by designated staff with permissions).
9.	Time limit for keeping the data	<ul style="list-style-type: none"> Time limits for audio / video calls: by default are processed only in real time (recording is disabled). NO data is saved; When enabled, meeting recordings are saved in the OneDrive account of meeting organiser for 90 days and then deleted automatically; By default, MS Teams chat messages are kept for one year and then deleted automatically; Metadata related to MS Teams calls and chats is kept for 30 days and then deleted automatically; If any of this MS Teams content qualifies as a record it should be saved in Cedefop's Records Bank and relevant retention policies applied.
10.	Recipients of the data	<ul style="list-style-type: none"> Cedefop's staff and/or participants in a MS Teams call / meeting can see who else is participating in and can access related chat; Cedefop's records management staff and records bank correspondents if MS Teams content qualifies as a record; In case of legal action and/or administrative or disciplinary procedure, may include Cedefop recipients such as Anti-harassment Coordinator, Internal Control, Legal Service and/or Security officer, and/or external recipients such as the European Data Protection Supervisor, the European Ombudsman, competent national or EU judicial authorities (including the Court of Justice of the European Union).
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>In most cases, no personal data is transferred outside the EU/EEA. All customer data at rest, including all back-up data are stored within the geolocation of the tenant and for Cedefop that is the EU/EEA territory. However, for certain limited categories of personal data, Microsoft Ireland may transfer personal data to the USA or any other country in which Microsoft or its sub-processors operate.</p>
12.	General description of security measures where possible.	<ul style="list-style-type: none"> Cedefop's ICT manages security measures that protect data stored in MS Teams and also the records bank. These are documented generally in in Cedefop's ICT Use and Security Policy;

		<ul style="list-style-type: none"> • All ICT security measures for protection of M365 are applied (see also section 13 of Cedefop M365 DPIA)³.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	Available on intranet for all Cedefop staff. Data protection disclaimer included in invitations to meetings or events. Privacy statements for specific Cedefop events are also created.

³ RB(2022)00117 - Data Protection Impact Assessment(DPIA) for the Microsoft 365 (M365) platform at Cedefop (23 February 2022)