



Privacy statement in relation to the protection of personal data in Voice-video calling and instant messaging using MS Teams

Personal data are processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regards to the processing of personal data by the Union institutions, bodies, offices and agencies.

Identity of controller:

The controller is Cedefop and the responsible department is Department for Resources and Support (DRS) - Information and communication technologies (ICT). Functional email address for enquiries on processing of personal data: ict-service@cedefop.europa.eu

Processors:

- 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;
- Designated Cedefop staff members with corresponding permissions can record meetings;

Purpose of processing:

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.

- 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.

Cedefop carried out a Data Protection Impact Assessment (DPIA) for the use of the M365 platform in Cedefop¹. See also data protection record for [Microsoft 365 Documents, Records management and Collaboration](#).

Data subjects:

Cedefop staff, external collaborators, contractors and participants in Cedefop MS Teams meetings.

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

Type of data processed:

- 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;
- Recording of meetings (only when activated by designated staff with permissions).

Legal basis / lawfulness:

Lawfulness of the processing is based on Article 5(1) of Regulation (EU) 2018/1725³, in particular, (a) "processing is necessary for performance of tasks in the public interest attributed by EU or MS legislation" and (b) "processing is necessary for compliance with a legal obligation to which the controller is subject".

The processing operations on personal data linked to the organisation and management of meetings is also necessary for the performance and the support of tasks carried out by Cedefop as mandated by article 2 of the Regulation (EU) 2019/128⁴.

Recipients of the data processed:

- 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).

Transfers of personal data to third countries or international organisations

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.

Cedefop carried out a Data Protection Impact Assessment (DPIA) for the use of the M365 platform in Cedefop⁵

² Described in CDFNOT001 Computer Access accounts

³ [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 No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39–98

⁴ [Regulation \(EU\) 2019/128](#) of the European Parliament and of the Council of 16 January 2019 establishing a European Centre for the Development of Vocational Training (Cedefop) and repealing Council Regulation (EEC) No 337/75, OJ L 30, 31.1.2019, p. 90–105

⁵ RB(2022)00117 - Data Protection Impact Assessment(DPIA) for the Microsoft 365 (M365) platform at Cedefop (23 February 2022)

How long is your data retained?

- 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.

Rights of the data subjects

According to the Regulation (EU) 2018/1725, data subjects have the following rights:

- a) the **right to access**, as foreseen in article 17 of the Regulation
- b) the **right to rectification**, as foreseen in article 18 of the Regulation
- c) the **right to erasure**, as foreseen in article 19 of the Regulation and provided that strong justification is given
- d) the **right to restriction of processing**, as foreseen in article 20 of the Regulation
- e) the right to **lodge a complaint with the European Data Protection Supervisor** (EDPS), as foreseen in article 63 of the Regulation.

In case of any queries or doubts please contact the Data Protection Officer of Cedefop (data-protection-officer@cedefop.europa.eu).

You are also entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>

Contact

If you have any further questions concerning your data, please contact the controller: ict-service@cedefop.europa.eu

You can also contact the Data Protection Officer of Cedefop: data-protection-officer@cedefop.europa.eu).

UPDATED: 28 March 2023