Cisco Webex Teams
(formerly Cisco Spark)

This Privacy Data Sheet describes the processing of personal data (or personal identifiable information) by Cisco Webex Teams.

1. Overview of Cisco Webex Service Protection Capabilities

Cisco Webex Teams (the “Service” or “Webex Teams”) is a cloud-based service made available by Cisco to companies or persons (“Customer,” “you,” or “your”) who purchase it for use by their authorized users (“user”). Cisco Webex Teams provides a complete collaboration suite for your team to create, meet, message, make calls, and share, regardless of whether they are together or apart—in one continuous workstream before, during, and after meetings. For more information about the Service, please visit the Cisco Webex Teams homepage.

Because the Service enables collaboration among users, you will be asked to provide your personal data in order to use it. The following paragraphs describe Cisco’s processing of personal data in connection with the delivery of the Service, the location and transfers of that data, and how it is secured in accordance with privacy principles, laws, and regulations. Cisco will use your personal data consistent with this Privacy Data Sheet. Note that this Privacy Data Sheet is a supplement to the Cisco Privacy Statement.

2. Personal Data Processing

If you are a user and your employer is the Customer that purchased the Service, all of the information described in this Privacy Data Sheet is subject to your employer’s policies regarding retention, monitoring, deletion, and export of information associated with the Service. This may include access to the keys used to encrypt or decrypt your User-Generated Information.

If you as an individual subscribed to the Service for personal use, your employer’s policies will not apply to the data that you share while using the Service. However, if you subscribed to the Service using your employer-issued email address and your employer later purchases the Services from Cisco, you will be required to update the email address associated with your account to a personal email address. Cisco recommends that you use your personal email address to access the Service for personal use. If you want to change your email address, you can do so by following these instructions.

Users can communicate with users from other companies through the Cisco Webex Teams app in two types of space: (i) a group space made up of at least three users belonging to more than one organization; or (ii) a one-on-one space made up of two users belonging to different organizations. If you are a user posting into spaces created by or including users from other companies, those companies’ policies related to retention, monitoring, deletion and export may govern your data (as described in the applicable sections of this Privacy Data Sheet).

This Privacy Data Sheet covers the Service and Technical Support Assistance included with the Service. When you launch a meeting in Cisco Webex Teams, Cisco Webex Meetings functionality will be used. Accordingly, please see the Cisco Webex Meetings Privacy Data Sheet (available on The Cisco Trust Center) for a description of how recordings are collected and processed. The tables below list the categories of personal data processed by the Service and describe why we process such data.

Table 1 Cisco Webex Teams

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Types of Personal Data</th>
<th>Purpose of Processing</th>
</tr>
</thead>
</table>

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### Privacy Data Sheet

**Registration Information**
- Activation Codes
- Display Name
- Email Address
- Name
- Profile Picture
- Password
- Company Name
- Billing Contact Name
- Organization ID
- Universal Unique Identifier

We use Registration Information to:
- Enroll you in Cisco Webex Teams
- Display your user avatar identity to other users
- Notify you about features and updates
- Understand how the Service is used
- Send you Cisco marketing communications
- Make improvements to the Service and other Cisco products and services
- Provide you remote access support
- Authenticate and authorize access to your account

**Host and Usage Information**
- Device Name
- Geolocation
- IP Address
- User Agent Identifier
- Operating System Type and Version
- Client Version
- IP Addresses Along the Network Path
- MAC Address
- Time Zone
- Domain Name
- Activity Logs

We use Host and Usage Information to:
- Understand how the Service is used
- Diagnose technical issues
- Conduct analytics and statistical analysis in aggregate form to improve the technical performance of the Service
- Respond to Customer support requests

**User-Generated Information**
- Spaces Activity (date, time, person engaged and the activity)
- Messages (content, sender, recipients, date, time, and read receipts)
- Content Shared (files, file names, sizes and types)
- Whiteboard Content
- Meetings and Calls Information (title, invitation content, participants, link, date, time, duration and quality ratings)
- Voicemails
- Presence (user status)
- Recordings

We use User-Generated Information to:
- Provide the Service, an important component of which is a persistent history of your interactions with other users

**Information Collected Related to Optional Features**
- Geographic Location

If you choose to enable optional location-sharing, we will collect your geographic location when you send a message or share content in a space. We collect this information so that it can be shared with other users in the space.

**Information Collected Related to Optional Features**
- Calendar and Contact Information on Your Mobile Device

If you choose to use the Service on your mobile device, upon sign-up you will have the option of sharing your calendar and/or contacts with the Service mobile application. This calendar and contact information is accessed only by the application locally on your mobile device and is not shared with Cisco unless and until:
- you interact with a contact from your mobile device contact list using the Service, in which case we collect information only about that user. The Service mobile application uses this information to make it easier for you to connect with your contacts.
### Information Collected Related to Optional Features

- Information Collected by Cookies, Local Storage, and Other Browser Storage Technologies

When you use the Service in your web browser, we use cookies, local storage, and other browser storage technologies to ensure that you can stay logged into the Service until you choose to log out and to improve the performance of the Service. These technologies may store Registration Information, Host, and/or Usage Information. Cookies are always sent using transport encryption.

### Table 2 Cisco Webex Calling (formerly Cisco Spark Call)

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Types of Personal Data</th>
<th>Purpose of Processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration Information</td>
<td>SIP Identifier Phone Number Directory Extension Direct Line Voicemail Box Number Voicemail PIN Device Activation Codes Email Address Name Profile Picture Password</td>
<td>We use Registration Information to: Enroll you in Cisco Webex Calling (formerly Cisco Spark Call) Notify you about features and updates Understand how the Service is used Send you Cisco marketing communications Make improvements to the Service and other Cisco products and services Enable Directory Services within your organization Provide you remote access support Authenticate and authorize access to your account Route calls to your users and places Allow internal and external dialing Allow you to activate your IP Phones Access your voicemail Respond to Customer support requests</td>
</tr>
<tr>
<td>Host and Usage Information</td>
<td>Device Name Geolocation IP Address Mobile Type MAC Address Time Zone Universal Unique Identifier Domain Name Activity Logs</td>
<td>We use Host and Usage Information to: Understand how the Service is used Diagnose technical issues Conduct analytics and statistical analysis in aggregate form to improve the technical performance of the Service Respond to Customer support requests</td>
</tr>
<tr>
<td>User-Generated Information</td>
<td>Recordings Transcripts Voicemail</td>
<td>We use User-Generated Information to: Provide the Service, enabling collaboration among users in different locations Provide customized Music On Hold Provide voicemail and voicemail transcription services</td>
</tr>
</tbody>
</table>

Note: We route audio and video call content and screen sharing content between call participants but we do not retain or store the content.
Table 4 Cisco Webex App Hub (APIs)

| Personal Data Category | Types of Personal Data                                                                 | Purpose of Processing                                                                                                                                                                                                                                                                                                                                
|------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------
| Registration Information | - Activation Codes <br>- Display Name <br>- Email Address <br>- Name <br>- Password  <br>- Company Name <br>- Billing Contact Name <br>- Organization ID <br>- Universal Unique Identifier | We use Registration Information to: <br>- Authenticate and authorize access to Cisco Webex App Hub <br>- Notify you of features and updates <br>- Understand how the Service is used <br>- Provide you remote access support <br>- If you choose to use Cisco Webex App Hub to add a third-party integration or bot to a space, the third party may share information and content associated with your third-party service or application account with us. We do not receive or store your passwords for these third-party services or applications, although we do store authentication tokens associated with them. |
| Host and Usage Information | - Device name <br>- Geolocation <br>- IP Address <br>- Mobile Type <br>- MAC Address <br>- Time Zone <br>- Universal Unique Identifier <br>- Domain Name <br>- Activity Logs | We use Host and Usage Information to: <br>- Provide the Service <br>- Diagnose technical issues <br>- Conduct analytics and statistical analysis in aggregate form to improve the technical performance of the Service <br>- Respond to Customer support requests |

Technical Support Assistance

If a Customer reaches out to Cisco Technical Assistance Center (TAC) for problem diagnosis and resolution, Cisco TAC may receive and process personal data from the Service. The Cisco TAC Service Delivery Privacy Data Sheet describes Cisco’s processing of such data.

3. Cross-Border Transfers

Cisco leverages its own data centers as well as third-party cloud hosting providers to deliver the Service globally. These data centers are currently located in the following countries (data center locations may change from time to time and this Privacy Data Sheet will be updated to reflect those changes)
Privacy Data Sheet

Cisco Data Center Locations | Cloud Infrastructure Provider Locations | Media Data Center Locations
---|---|---
Dallas, TX, USA | Chicago, IL, USA | Dallas, TX, USA
San Jose, CA, USA | Dallas, TX, USA | San Jose, CA, USA
Washington DC, USA | Los Angeles, CA, USA | Washington DC, USA
Toronto, Canada | New York, New York, USA | Amsterdam, Holland
Amsterdam, Holland | Frankfurt, Germany | Frankfurt, Germany
Bangalore, India | Sao Paulo, Brazil | London, UK
London, UK | Singapore, Singapore | Sao Paulo, Brazil
Singapore, Singapore | Sydney, Australia | Singapore, Singapore
Tokyo, Japan | | Sydney, Australia

Not all of the above locations are used for processing and storage for all Cisco Webex Teams products. Storage and processing details are as follows:

<table>
<thead>
<tr>
<th>Product</th>
<th>Processing</th>
<th>Storage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cisco Webex Teams</td>
<td>US locations + Worldwide Media Data Center locations</td>
<td>US locations only (For meeting recordings, reference the Cisco Webex Meetings Privacy Data Sheet.)</td>
</tr>
<tr>
<td>Cisco Webex Calling (formerly Spark Call)</td>
<td>US locations only</td>
<td>US locations only</td>
</tr>
<tr>
<td>Cisco Cloud Care</td>
<td>US locations only</td>
<td>US locations only</td>
</tr>
<tr>
<td>Cisco Webex App Hub</td>
<td>US locations only</td>
<td>US locations only</td>
</tr>
</tbody>
</table>

Cisco has invested in a number of transfer mechanisms to enable the lawful use of data across jurisdictions. In particular:

- Binding Corporate Rules
- EU-US Privacy Shield Framework
- Swiss-US Privacy Shield Framework
- APEC Cross Border Privacy Rules
- EU Standard Contractual Clauses
4. Access Control

Customers and Cisco can access personal data stored on the Webex Teams platform as described in the table below. In a group space, the administrator of the organization that created the space can monitor all of the information posted in the group space; whereas the administrator of organizations that have participants in the space can monitor only those messages and files posted by their own users. In a one-on-one space, both organizations’ administrators can monitor all of the information posted in the one-on-one space. Participants in group spaces and one-on-one spaces can access all of the information posted in the space.

Table 5

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Who has access</th>
<th>Purpose of the access</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration Information</td>
<td>Customer through the Webex Control Hub</td>
<td>Process in accordance with Customer’s personal data policy</td>
</tr>
<tr>
<td></td>
<td>Cisco</td>
<td>Support the Service in accordance with Cisco’s data access and security controls process</td>
</tr>
<tr>
<td>Host and Usage Information</td>
<td>Customer through the Webex Control Hub</td>
<td>Process in accordance with Customer’s personal data policy</td>
</tr>
<tr>
<td></td>
<td>Cisco</td>
<td>Support and improvement of the Service by the Cisco Webex Teams Support and Development Team</td>
</tr>
<tr>
<td>User-Generated Information (excluding Recordings, discussed below)</td>
<td>Party 1</td>
<td>Process in accordance with Customer’s personal data policy</td>
</tr>
<tr>
<td></td>
<td>Cisco</td>
<td>While Cisco operates the Service, Cisco does not access or monitor this data unless it is shared with Cisco by Customer and will only do so in accordance with Cisco’s data access and security controls process. Additionally, if users invite Cisco into a user-hosted space, or join a Cisco-owned space, users should be aware that as part of Cisco’s security process, Cisco may scan (but does not retain) uploaded files.</td>
</tr>
<tr>
<td></td>
<td>Other Customers (when users share with other Customers)</td>
<td>To the extent users post User-Generated Information in spaces that include users from other companies, those users and their administrators may be able to access the data posted. Users can see the other participants (including bots) in a space, and any user in a non-moderated space and the moderator in a moderated space can remove another user or bot at any time</td>
</tr>
<tr>
<td></td>
<td>Bots (when users add them to their spaces and communicate with the bot directly)</td>
<td></td>
</tr>
<tr>
<td>Recordings</td>
<td>User through the My Webex Meetings Page</td>
<td>Modify, control, and delete meeting recordings based on user’s preferences</td>
</tr>
<tr>
<td></td>
<td>Customer using APIs provided with the Service or through the Site Admin Page</td>
<td>Modify, control, and delete in accordance with Customer’s personal data policy</td>
</tr>
<tr>
<td></td>
<td>Cisco</td>
<td>While Cisco operates the Service, Cisco does not access or monitor this data unless it is shared with Cisco by Customer, and will only do so in accordance with Cisco’s data access and security controls process</td>
</tr>
<tr>
<td></td>
<td>Other Customers and users (when shared during a meeting)</td>
<td>Content you choose to share during a meeting may be accessed by users in the meeting, wherever they are located. Even after you remove information from Webex Meetings, copies of that content may remain viewable elsewhere to the extent it has been shared with others.</td>
</tr>
</tbody>
</table>

5. Data Portability
Cisco Webex Teams allows Customers to export up to 90 days of User-Generated Information using APIs provided with the Service (except for recordings, discussed below). Additionally, Customers that purchase Pro Pack for Cisco Webex Control Hub can use the APIs that come with that service to export User-Generated Information for any period that the Customer sets, in accordance with its corporate policies. Customers that have terminated the Service and users with a free Webex Teams account can request to export User-Generated Information by sending a request to privacy@cisco.com or opening a TAC support request. The User-Generated Information posted by users who are using Cisco Webex Teams purchased by their employer is treated as data of the employer (Cisco’s Customer). Accordingly, the Customer’s corporate policies will apply. If users wish to export their User-Generated Information, the user must consult the Customer administrator or the person within their employer authorized to make determinations regarding the disposition of data belonging to the Customer. In a group space, the administrator of the organization that created the space can export all of the information posted in the group space; whereas the administrator of the organizations that have participants in the space can export only those messages and files posted by their own users. In a one-on-one space, both organizations’ administrators can export all of the information posted in the one-on-one space.

There are several ways Customers may export their personal data from the Webex Teams platform. Customers may export limited categories of personal data via the Webex Control Hub (as CSV exports) and all types of personal data (except authentication tokens) using APIs.

When you launch a meeting in Cisco Webex Teams, Cisco Webex Meetings functionality will be used. Cisco Webex Meetings allows Customers to export all meeting recordings stored on the Webex Meetings platform. A Customer’s administrator may do so using APIs provided with the Webex Meetings Service or through the Webex Meetings Site Admin Page; while individual users may do so through the My Webex Meetings Page. Meeting recordings are available in Webex Meetings proprietary ARF and standard mp4 formats depending on the account type. Cisco offers a free Webex Meetings ARF player to convert ARF files to mp4 format.

### 6. Data Deletion & Retention

Cisco Webex Teams allows for the persistent retention of messages and files shared by users. Accordingly, Customer’s User-Generated Information is stored on the Webex Teams platform for 7 years while the Customer has an active subscription (subject to data storage limitations). For customers that wish to minimize the amount of data stored on the platform or customize the retention period to be longer or shorter than 7 years, Pro Pack for Cisco Webex Control Hub includes retention settings that automatically delete User-Generated Information in accordance with the enterprise Customer’s corporate data retention and deletion policies.

After a Customer’s subscription terminates or expires, its remaining encrypted User-Generated Information and personal data is retained on our platform for 7 years. Customers that have terminated the Service and users with a free Webex Teams account can request deletion of personal data retained on the Webex platform by sending a request to privacy@cisco.com or opening a TAC support request. When a Customer or user makes a request for deletion, Cisco endeavors to delete the requested data from its systems within 30 days, unless the data is required to be retained for Cisco’s legitimate business purposes. If we are required to retain certain categories of data, the reason why we retain it and the retention period are described in the table below.

In a group space, the retention policy of the organization that created the space controls, and its administrator can delete all of the information posted in the group space. In a one-on-one space, each organization’s administrator can delete only those messages and files posted by its own user in accordance with its retention policy.

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Retention Period</th>
<th>Reason and Criteria for Retention</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration Information</td>
<td>7 years from when the Service is terminated</td>
<td>Data collected as part of registration, including information provided by Customers as part of Cisco’s financial due diligence, constitute Cisco business records and are kept to comply with Cisco financial and audit policies, as well as tax requirements.</td>
</tr>
<tr>
<td>User-Generated Information (excluding Recordings)</td>
<td>Active Subscriptions: • 7 years unless Customer purchases Pro Pack for Cisco Webex Control Hub, in</td>
<td>User-Generated Information is persistent because the Service was built to allow Customers to leverage this information to collaborate with other users over long periods of time.</td>
</tr>
</tbody>
</table>
7. Personal Data Security

Cisco Webex Teams is ISO 27001:2013 certified and in accordance with those standards adopts technical and organizational security measures to protect your personal data from unauthorized access use or disclosure as required by law. Additional information about our encryption architecture is summarized in the table and paragraphs below.

Table 6

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Type of Encryption</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration Information (excluding Passwords, discussed below)</td>
<td>Encrypted in transit, but not at rest</td>
</tr>
<tr>
<td>Passwords</td>
<td>Encrypted in transit and at rest</td>
</tr>
<tr>
<td>Host and Usage Information</td>
<td>Encrypted in transit, but not at rest</td>
</tr>
<tr>
<td>User-Generated Information (excluding Recordings, discussed below)</td>
<td>Encrypted end to end (except as explained below) with Cisco holding keys on Customer’s behalf unless Customer purchases the Pro Pack for Cisco Webex Control Hub and deploys Hybrid Data Security, which allows Customer to hold keys</td>
</tr>
<tr>
<td>Recordings</td>
<td>When you launch a meeting in Cisco Webex Teams, Cisco Webex Meetings functionality will be used. Beginning May 2018, Cisco released encryption of recordings at rest. Any new recordings created on your site after the enablement of this feature will be automatically encrypted end to end.</td>
</tr>
</tbody>
</table>

The Service uses different kinds of encryption to protect different kinds of data in transit and in storage. In this section, “you” and “your” refers to the user.

End-to-end encryption is used to protect messages, content, whiteboards, and meeting information. Just prior to sending a message from your client, it is encrypted on your device. (If you have opted to share your location information, that information is also encrypted.) Messages remain encrypted until they are received by other users, where they are decrypted on those user’s devices. The same process is used for each whiteboard stroke, whiteboard background images, and whiteboard snapshots (with one exception listed below under media encryption). The same process is also used for content that you share, except as noted below. Push notifications are likewise end-to-end encrypted.

There are a few circumstances under which User-Generated Information is decrypted:
For certain types of files (PDFs, Microsoft Word documents, and PowerPoint presentations), we decrypt the file to be "transcoded" for display in a space. For example, if you upload a slide presentation into a space, it will first be encrypted on your device. When we receive the presentation on our server, we will decrypt it to generate an individual thumbnail images of each slide. We will then encrypt the thumbnails and presentation and send them to the other users in the space. The decrypted file and images are not stored; only the encrypted forms of these objects are stored.

For bots and integrations that have not integrated with our end-to-end encryption scheme, we decrypt messages and content associated with the bot or integration before sending it to the third party supporting the bot or integration. We do not store the decrypted messages and content.

Messages and content may be decrypted by your employer or the employers of those you communicate with using the Service. If you communicate with Cisco employees, then those messages can be decrypted by Cisco.

**Media encryption** is used to protect the audio, video, screen sharing data, and voicemails that you transmit during a call. When you make a call, media is encrypted from your device to our servers. It may be decrypted on our servers so that we can manage the call. It is re-encrypted before being sent to the other participants on the call unless they are connected via the public telephone network or do not support encryption. If you dial into a meeting using SIP and there is whiteboarding taking place in the meeting, we will decrypt the end-to-end encrypted whiteboard content, transcode it, and send it to you using media encryption. We do not store any call audio, video, or screen sharing data on our servers. Voicemails are encrypted from your device to our servers, decrypted to be prepared for storage, and re-encrypted in storage on our servers. Voicemails transmitted via email are not encrypted. Therefore, Control Hub provides the option to transmit voicemails via Webex Teams instead of email. Faxes are not encrypted.

**Transport encryption** (also known as HTTPS) is used to protect all connections to and from the Service other than voice and video calls. When you register for the Service, send messages, share content, write on a whiteboard, connect with third-party services or applications via integrations, seogs or screen shots to provide us with feedback, or otherwise connect to the Service, we always use transport encryption.

### 8. Third Party Service Providers (Sub-processors)

We may share User-Generated Information, Registration Information, Host Information, and/or Usage Information with service providers, contractors, or other third parties to assist in providing and improving the Service. The data shared may include aggregate statistics or individualized data. All sharing of information is carried out consistent with the Cisco Privacy Statement and we contract with third-party service providers that can provide the same level of data protection and information security that you can expect from Cisco. We do not rent or sell your information. A current list of third-party service providers with access to personal data can be provided upon request.

If a Customer purchases the Service through a Cisco partner, we may share any or all of the information described in this Data Sheet with the partner.

Unencrypted messages may be shared with third-party services and applications that you choose to integrate with the Service, but not with any other third parties without your permission or unless required by law.

### 9. Information Security Incident Management

**Breach and Incident Notification Processes**

The Data Protection & Privacy team within Cisco’s Security & Trust Organization coordinates the Data Incident Response Process and manages the enterprise-wide response to data-centric incidents. The Incident Commander directs and coordinates Cisco’s response, leveraging diverse teams including the Cisco Product Security Incident Response Team (PSIRT), the Cisco Security Incident Response Team (CSIRT), and the Advanced Security Initiatives Group (ASIG).

PSIRT manages the receipt, investigation, and public reporting of security vulnerabilities related to Cisco products and networks. The team works with Customers, independent security researchers, consultants, industry organizations, and other
vendors to identify possible security issues with Cisco products and networks. The Cisco Security Center details the process for reporting security incidents.

The Cisco Notification Service allows Customers to subscribe and receive important Cisco product and technology information, including Cisco security advisories for critical and high severity security vulnerabilities. This service allows Customers to choose the timing of notifications, and the notification delivery method (email message or RSS feed). The level of access is determined by the subscriber’s relationship with Cisco. If you have questions or concerns about any product or security notifications, contact your Cisco sales representative.

10. Certifications and Compliance with Privacy Laws

The Security and Trust Organization and Cisco Legal provide risk and compliance management and consultation services to help drive security and regulatory compliance into the design of Cisco products and services. Cisco Webex Teams and its underlying processes are designed to meet Cisco’s obligations under the EU General Data Protection Regulation and other privacy laws around the world.

Cisco leverages the following privacy transfer mechanisms related to the lawful use of data across jurisdictions:

- Binding Corporate Rules
- EU-US Privacy Shield Framework
- Swiss-US Privacy Shield Framework
- APEC Cross Border Privacy Rules
- EU Standard Contractual Clauses

In addition to complying with our stringent internal standards, Cisco also continually maintains third-party validations to demonstrate our commitment to information security. Cisco Webex Teams has received the following certifications:

- ISO 27001
- ISO 27017
- SOC 2 Type I Attestation
- SOC 2 Type II Attestation
- Cloud Computing Compliance Controls Catalogue (C5)

Customers can review the certifications under NDA.

11. General Information and GDPR FAQ

For more information and FAQs related to Cisco Webex Teams technical and operational security features, please see the Cisco Webex Teams Tech Ops and Security FAQs page and the Cisco Webex Teams Security, Compliance, and Management page.

For more general information and FAQs related to Cisco’s Security Compliance Program and Cisco’s GDPR readiness please visit The Cisco Trust Center.