

Data protection statement on the processing of personal data for virtual meetings/events and videoconferencing using the “EPOtogether tool”

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect “for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identify you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

1. What is the nature and purpose of the processing operation?

The EPOtogether tool (hereinafter “the tool”) is a cloud-based platform developed by the external provider “SpatialChat”, which is accessed through your web browser and thus does not need to be installed in your computer. It is provided by Principal Directorate Communication to organise virtual meetings and teleconferences both within the EPO and between the EPO and EPO’s stakeholders.

The tool’s core features include business messaging, calling, audio and video meetings and file sharing. Meetings and teleconferences can be recorded, and live captions can be taken. The use of such latest features is granted to specific EPO employees and external providers supporting the EPO only, and in accordance with internal EPO policies.

Personal data are processed for the following purposes:

- Providing to EPO employees a platform where they can interact and socialise in a virtual space.
- Organising meetings and events.
- Giving access to participants to join any specific rooms.
- Sharing information, videos, links, interactions (gifs and emojis).
- Manage discussions, presentations, questions and answers organised in the social and stage rooms.
- Recording or taking live captions of any event taking place in the Stage room for editing and subsequent publication on the EPO internal (e.g., Intranet, EPO TV) and external platforms (e.g., EPO website, e-knowledge Portal).
- Analytical purposes (e.g., statistics).
- Providing end-user support and troubleshooting for the platform and features.
- Coordinating any technical issues affecting the execution of the event that may arise before, during or after the event takes place.

EPO employees can access any of the spaces via a Single Sign-On option, which is linked to their EPO account. For external participants (hereinafter “guests”), they can join a particular space by member invitation and once the event administrators have provided them with a specific link and code number (if decided by the host of the event) or a CSV file. The organiser shall delete the space after the event, to avoid that people who have visited an event have access to future events unless invited.

Both EPO employees and guests (hereinafter “users”) need to add their email address (only the first time they join the platform or until they delete the related cookies on their web browser) and are asked to indicate the name or nickname they want to show in their profile, which will then be displayed during the meeting(s)/event(s). If you are an EPO employee, please be informed that your name and surname will appear by default, however, under “Profile,” this information can be edited. Additionally, users can voluntarily upload a picture and information about them, which will be visible to everybody having access to the tool.

By default, users join the platform with the camera and microphone off and have the option to turn them on in the course of a meeting/event. In case recordings and screenshots are planned, participants will be notified in advance, so that users can choose whether they wish to be recorded or not and, consequently, keep their camera and microphone on or off.

The platform offers different kinds of interactions between users:

- 1) The Stage rooms are used to carry out big meeting/events. Only in these rooms are live recording and captions allowed. In addition, only EPO employees with an Administrator status can record and export the recordings, decide the amount of information that participants can share, create more rooms in that space, as well as allow users to intervene as speakers.
- 2) Social rooms allow users to see different discussion groups taking place. Only users with access to a space can see and join the different rooms created in that space. They can choose whether to join a meeting depending on, for example, their hobbies, location, or time working at the Office. Any content that the user has shared on the board will disappear after that user leaves the room. On the contrary, information, statements and material shared on the chat remain until the organiser deletes the space.
- 3) Users can directly engage in discussion with a specific person by clicking on their avatar or selecting the name from the list on the screen.

In addition, the platform also allows the adding and use of external applications through a link, such as the Slido tool for surveys and polls. Please bear in mind that when you click on a link to a third-party site, you will be leaving the EPOtogether tool’s site.

In order to facilitate transparent communication, your questions and statements (e.g., comments and/or opinions) will not be collected and displayed in anonymous form in the tool. Consequently, participants of a meeting/event or a social room will also be able to see users’ email address (and therefore potentially your name and surname) in case of any questions.

The processing is not intended to be used for any automated decision-making, including profiling.

2. What personal data do we process?

The following categories of personal data are processed:

- Information that is necessary to join the platform:
 - Professional or personal email address
 - If you are an EPO employee, please be informed that your name and surname will appear by default as your profile on the platform is linked to your EPO account, however, under “Profile,” this information can be edited
- Other personal data which might be processed from the users:
 - Choice of pronouns

- Profile picture (by default a generic avatar with your initials is displayed)
- Other information you share on the “About you” box
- Written and oral statements, opinions and comments when using the chat tool or speak during a meeting/event which is being recorded
- Audio-visual information (e.g., when recording or taking photos of the meeting/event, and you have your camera on. Also, when you participate as speaker or have given the access to use the microphone)
- Presentations and other information shared during a meeting/event, such as the agenda and the biography of the speakers
- Images, videos, whiteboards, documents, shared desktop screen or other material (e.g.: Background image set by the Team Members, GIFs, Google Docs, Iframes) shared while using the “Share” function)
- Analytical information: the event administrators can ask for space analytics reports information related to the usage of the platform. When it comes to space analytics currently the company can provide reports where the number of attendees in the whole space, rooms, geolocation spread, time spent on the platform can be seen. All these details and reports can be requested per space and specific time and date.

3. Who is responsible for processing the data?

Personal data are processed under the responsibility of the Principal Directorate Communication acting as the EPO's delegated data controller.

Personal data are processed by the PD Communication and BIT staff involved in managing the meetings and events hosted on the tool.

External contractors involved in providing the platform and the possibility for you to ask questions (e.g.: SpatialChat) may also process personal data, which can include accessing it.

4. Who has access to your personal data and to whom are they disclosed?

Personal data are disclosed on a need-to-know basis to the EPO staff working in PD Communication.

Personal data will only be shared with authorised persons responsible for the necessary processing operations. They will not be used for any other purposes or disclosed to any other recipients. For instance, only EPO employees with an Administrator status can record and export the recordings, decide the amount of information that participants can share, as well as allow users to intervene as speakers.

Personal data may be disclosed to third-party service providers for maintenance and support purposes.

Users will have access to the data you voluntarily provided on your profile, as well as documents, videos and other links you share with them during a meeting/event/one-to-one conversation.

General public may have access to your personal data (e.g., image and statements) if a meeting/event held on the stage room was recorded and published on the EPO channels.

5. How do we protect and safeguard your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss or alteration and unauthorised disclosure or access.

All personal data are stored in secure IT applications in accordance with the EPO's security standards. Appropriate levels of access are granted individually only to the above-mentioned recipients.

For systems hosted on EPO premises, the following basic security measures generally apply:

- User authentication and access control (e.g., role-based access control to the systems and network, principles of need-to-know and least privilege)
- Logical security hardening of systems, equipment and network
- Physical protection: EPO access controls, additional access controls to datacentre, policies on locking offices
- Transmission and input controls (e.g., audit logging, systems and network monitoring)
- Security incident response: 24/7 monitoring for incidents, on-call security expert.

For personal data processed on systems not hosted on EPO premises, the providers processing the personal data have committed in a binding agreement to comply with their data protection obligations under the applicable data protection legal frameworks. The EPO has also carried out a privacy and security risk assessment. These systems are required to have implemented appropriate technical and organisational measures such as: physical security measures, access and storage control measures, securing data at rest (e.g., by encryption); user, transmission and input control measures (e.g. network firewalls, network intrusion detection system (IDS), network intrusion protection system (IPS), audit logging); conveyance control measures (e.g. securing data in transit by encryption).

SpatialChat implements appropriate technical and organisational measures to help protect the security of personal data; they have implemented various policies including pseudonymisation, encryption, access, and retention policies to guard against unauthorised access and unnecessary retention of personal data in their systems.

6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If you would like to exercise any of these rights, please write to the delegated data controller at PDComm-DPL@epo.org. In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this form (depending on the data subjects concerned please include all the applicable forms: [form](#) (for externals), [form](#) (for internals) and/or [form](#) (for pensioners)) and submit it with your request.

We will reply to your request without undue delay and in any event within one month of receipt of the request. However, Article 15(2) DPR provides that this period may be extended by two further months where necessary in view of the complexity and number of requests received. We will inform you of any such delay.

7. What is the legal basis for processing your data?

Personal data are processed in accordance with Article 5(a) of the Data Protection Rules, which states that “processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning.”

For the legal basis for any recordings made during events, please refer to the general data protection statement for events or for the specific event.

Personal data are processed on the basis of the following legal instrument: [EPO Data Protection Rules](#)

8. How long do we keep your data?

Personal data processed by the data controller or the service providers under its supervision are generally stored for the period of time necessary to achieve the purpose for which they have been processed.

Information necessary to join the platform and voluntary information and personal picture uploaded to the users' profile will be retained until they clear cookies from their device.

Nevertheless, contact details such as email address, name and surname can be kept for a longer period by the controller and in accordance with the general data protection statement for meetings and events.

For the personal data shared on the spaceboard, they are stored until the user who shared the information or material (e.g., video, gif, presentation) leaves the space/room.

For the personal data shared in the tool, they are stored until the space/room is deleted by the administrator and for a maximum period of 6 months.

Personal data contained in the recordings are stored and deleted according to the general data protection statement for meetings and event, and the EPO audio-visual retention policy.

Additionally, personal data may be processed for maintaining the performance of the SpatialChat Services, complying with legal obligations, and resolving disputes. SpatialChat may retain logs of automatically collected information (for internal statistics and security purposes).

In the event of a formal appeal/litigation, all data held at the time the formal appeal/litigation was initiated will be retained until the proceedings have been closed.

9. Contact information

EPO staff who have questions about the processing of their personal data should contact the delegated data controller at PDComm-DPL@epo.org or the data protection officer at dpo@epo.org.

Externals may contact the delegated data controller and/or the data protection officer at DPOexternalusers@epo.org.

Review and legal redress

If you consider that the processing infringes your rights as a data subject, you have the right to request review by the controller under Article 49 DPR and, if you disagree with the outcome of the review, the right to seek legal redress under Article 50 DPR.