

U.S. Securities and Exchange Commission

**Cisco WebEx Meetings
PRIVACY IMPACT ASSESSMENT (PIA)**



March 22, 2023

Office of Information Technology

Privacy Impact Assessment

Cisco WebEx Meetings

Section 1: System Overview

1.1 Name of Project or System

Cisco WebEx Meetings

1.2 Is the system internally or externally hosted?

- Internally Hosted (SEC)
Externally Hosted
 (Contractor or other agency/organization) Cisco WebEx U.S. Government Platform

1.3 Reason for completing PIA

- New project or system
 This is an existing system undergoing an update
First developed:
Last updated:
Description of update:

1.4 Does the system or program employ any of the following technologies?

- Enterprise Data Warehouse (EDW)
 Social Media
 Mobile Application (or GPS)
 Cloud Computing Services
 Web Portal
 None of the Above

Section 2: Authority and Purpose of Collection

2.1 Describe the project and its purpose or function in the SEC's IT environment

Cisco WebEx Meetings is a cloud-based software as a service (SaaS) that enables real-time virtual collaboration between SEC employees, contractors, and external users. Users may connect to a meeting via Cisco WebEx by telephone and video conferencing. They may also connect via Voice over Internet Protocol (VoIP) telephony or the Internet using their computer or audio device. WebEx Meetings provides SEC employees and contractors a suite of collaboration tools for sharing documents and presentations with meeting participants.

The WebEx Meetings messaging feature replaces Cisco Jabber and provides the capability for persistent chat between internal SEC users only. Meetings can be set up via Microsoft Outlook, the WebEx mobile application or via browser interface. WebEx obtains user information from SEC Active Directory (AD), via Cisco Unified Communications Manager, to create an account for an SEC employee or contractor when they access WebEx for the first time. External users are required to provide their name and an email address in order to join a WebEx meeting.

2.2 What specific legal authorities, arrangements, and/or agreements allow the information to be collected?

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Authorities cited in system of records notice (SORN) SEC-33 General Information Technology Records, 85 FR 85440 (January 27, 2021) are: 5 U.S.C. §302, Delegation of Authority; 44 U.S.C. §3534; Federal Information Security Act (Pub. L. 104-106, section 5113); Electronic Government Act (Pub. L. 104-347, section 203); and E.O. 9397 (SSN), as amended by E.O. 13487

2.3 Does the project use, collect, or maintain Social Security numbers (SSNs)? *This includes truncated SSNs.*

- No
 Yes

If yes, provide the purpose of collection:

If yes, provide the legal authority:

2.4 Do you retrieve data in the system by using a personal identifier?

- No
 Yes, a SORN is in progress
 Yes, there is an existing SORN

SEC-33 General Information Technology Records, 85 FR 85440 (January 27, 2021)

2.5 Is the information covered by the Paperwork Reduction Act of 1995 (PRA)?

- No
 Yes

2.6 Considering the purpose of the collection, what privacy risks were identified and how were those risks mitigated?

Privacy risk relevant to the purpose of the collection is minimal because information collected is limited to only what is necessary to join a meeting for business purposes.

Section 3: Data Collection, Minimization, and Retention

3.1 What information is collected, maintained, used, or disseminated about individuals? *Check all that apply.*

- The system does not collect, maintain, use, or disseminate information about individuals.

Identifying Numbers

- | | | |
|---|--|---|
| <input type="checkbox"/> Social Security Number | <input type="checkbox"/> Alien Registration | <input type="checkbox"/> Financial Accounts |
| <input type="checkbox"/> Taxpayer ID | <input type="checkbox"/> Driver's License Number | <input type="checkbox"/> Financial Transactions |
| <input type="checkbox"/> Employee ID | <input type="checkbox"/> Passport Information | <input type="checkbox"/> Vehicle Identifiers |
| <input type="checkbox"/> File/Case ID | <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Employer ID |
| <input checked="" type="checkbox"/> Other: Information recorded or shared (i.e. files) during a WebEx session may contain identifying numbers such as those listed above. | | |

General Personal Data

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Date of Birth | <input type="checkbox"/> Marriage Records |
| <input type="checkbox"/> Maiden Name | <input type="checkbox"/> Place of Birth | <input type="checkbox"/> Financial Information |
| <input type="checkbox"/> Alias | <input type="checkbox"/> Home Address | <input type="checkbox"/> Medical Information |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Telephone Number | <input type="checkbox"/> Military Service |
| <input type="checkbox"/> Age | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Mother's Maiden Name |
| <input type="checkbox"/> Race/Ethnicity | <input type="checkbox"/> Education Records | <input type="checkbox"/> Health Plan Numbers |
| <input type="checkbox"/> Civil or Criminal History | <input type="checkbox"/> Zip Code | |
| <input checked="" type="checkbox"/> Other: Information recorded or shared (i.e. files) during a WebEx session may contain general personal data such as those listed above. | | |

Work-Related Data

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- | | | |
|--|--|--|
| <input type="checkbox"/> Occupation | <input checked="" type="checkbox"/> Telephone Number | <input type="checkbox"/> Salary |
| <input type="checkbox"/> Job Title | <input checked="" type="checkbox"/> Email Address | <input type="checkbox"/> Work History |
| <input type="checkbox"/> Work Address | <input type="checkbox"/> Certificate/License Number | <input type="checkbox"/> Business Associates |
| <input type="checkbox"/> PIV Card Information | <input type="checkbox"/> Fax Number | |
| <input checked="" type="checkbox"/> Other: Information recorded or shared (i.e. files) during a WebEx session may contain work-related data elements such as those listed above. | | |

Distinguishing Features/Biometrics

- | | | |
|--|---|--|
| <input type="checkbox"/> Fingerprints | <input type="checkbox"/> Photographs | <input type="checkbox"/> Genetic Information |
| <input type="checkbox"/> Voice Recording | <input type="checkbox"/> Video Recordings | <input type="checkbox"/> Voice Signature |
| <input checked="" type="checkbox"/> Other: Information recorded or shared (i.e. files) during a WebEx session may contain distinguishing features/biometrics such as those listed above. | | |

System Administration/Audit Data

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> User ID | <input checked="" type="checkbox"/> Date/Time of Access | <input type="checkbox"/> ID Files Accessed |
| <input checked="" type="checkbox"/> IP Address | <input type="checkbox"/> Queries Ran | <input type="checkbox"/> Contents of Files |
| <input checked="" type="checkbox"/> Other: Session information (e.g. meeting title, date and time, frequency) | | |

3.2 Why is the PII listed in Question 3.1 collected, used, shared, or maintained by the system or project?

Information is collected to create a WebEx user account and permit access to WebEx meetings.

3.3 Whose information may be collected, used, shared, or maintained by the system?

- SEC Employees
Purpose: Information is collected from SEC employees for authentication and account creation.
- SEC Federal Contractors
Purpose: Information is collected from contractors for authentication and account creation.
- Interns
Purpose: Information is collected from interns or authentication and account creation.
- Members of the Public
Purpose: Information is collected from members of the public to grant guest access to a WebEx meeting.
- Employee Family Members
Purpose:
- Former Employees
Purpose:
- Job Applicants
Purpose: Information is collected from job applicants to grant guest access to a WebEx meeting.
- Vendors
Purpose: Information is collected from vendors to grant guest access to a WebEx meeting.
- Other:
Purpose: Information is collected from external stakeholders (employees from other federal agencies) to grant guest access to a WebEx meeting.

3.4 Describe the PII minimizing mechanisms and if the PII from the system is being used for testing, training, and/or research efforts.

Only the minimal amount of PII is collected from individuals to join a WebEx meeting. PII is not used for testing, training, and/or research.

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3.5 Has a retention schedule been established by the National Archives and Records Administration (NARA)?

- No. There is no records schedule because Cisco WebEx Meetings is not a system of records.
- Yes.

3.6 What are the procedures for identification and disposition at the end of the retention period?

There are no procedures for identification and disposition because Cisco WebEx Meetings is not a system of records.

3.7 Will the system monitor members of the public, employees, and/or contractors?

- N/A
- Members of the Public
Purpose:
- Employees
Purpose:
- Contractors
Purpose:

3.8 Considering the type of information collected, what privacy risks were identified and how were those risks mitigated?

The primary privacy risks associated with the SEC's use of Webex are unauthorized access or misuse of PII. This risk is mitigate as the information collected is limited to only that which is necessary to gain access to the Cisco WebEx Meetings or join a meeting.

Section 4: Openness and Transparency

4.1 What forms of privacy notice were provided to the individuals prior to collection of data? *Check all that apply.*

- Privacy Act Statement
- System of Records Notice
SEC-33 General Information Technology Records, 85 FR 85440 (January 27, 2021)
- Privacy Impact Assessment
The Cisco WebEx Meetings PIA is not provided to individuals prior to collection, but is available on the SEC's [website](#).
Date of Last Update:
- Web Privacy Policy
- Other notice: When applicable, active meeting participants will receive a written and audio message alerting them that the meeting will be recorded.
- Notice was not provided.

4.2 Considering the method(s) of notice provided, what privacy risks were identified regarding adequate notice and how were those risks mitigated?

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The risk to privacy regarding notice is minimal because adequate notice is provided as indicated in section 4.1.

Section 5: Limits on Uses and Sharing of Information

5.1 What methods are used to analyze the data?

Cisco WebEx Meetings does not analyze data.

5.2 Will internal organizations have access to the data?

- No
- Yes

Organizations:

5.3 Describe the risk to privacy from internal sharing and describe how the risks are mitigated.

There is minimal risk to privacy from internal sharing because information collected for Cisco WebEx Meetings is not shared among SEC divisions and offices.

5.4 Will external organizations have access to the data?

- No
- Yes

Organizations:

5.5 Describe the risk to privacy from external sharing and describe how the risks are mitigated.

There is no risk to privacy from external sharing because data is not shared with external organizations. Meeting invites sent by SEC employees are directed to specified individuals, inviting them to attend a specific meeting.

Section 6: Data Quality and Integrity

6.1 Is the information collected directly from the individual or from another source?

- Directly from the individual.
- Other source(s): Active Directory

6.2 What methods will be used to collect the data?

WebEx Meetings obtains user information from AD via Cisco Unified Communications Manager. Accounts are created when a user with an existing AD account accesses WebEx for the first time. External (non-SEC) users are required to provide their name and an email address directly into WebEx in order to join a WebEx meeting.

6.3 How will the data collected from individuals, or derived by the system, be checked for accuracy and completeness?

Information for SEC users is accurate as collected from AD. Information from external (non-SEC) users is not checked for accuracy.

6.4 Does the project or system process, or access, PII in any other SEC system?

- No
- Yes.

System(s): AD provides information to Cisco WebEx Meetings for individuals with existing AD profiles.

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6.5 Consider the sources of the data and methods of collection and discuss the privacy risk for this system related to data quality and integrity? How are these risks mitigated?

There is minimal privacy risk related to data quality and integrity because AD is the authoritative source for SEC user information required to use WebEx Meetings.

Section 7: Individual Participation

7.1 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project? If no opportunities are available to consent, decline or opt out, please explain.

SEC users do not have an opportunity to consent, decline or opt of providing their information after their initial use of WebEx. External (non-SEC) users may decline to enter their information and thus opt out of participating in a WebEx meeting.

7.2 What procedures are in place to allow individuals to access their information?

Individuals cannot access information about themselves because Cisco WebEx Meetings is not a system of records.

7.3 Can individuals amend information about themselves in the system? If so, how?

Individuals cannot access information about themselves because WebEx Meetings is not a system of records. However, SEC users may modify their avatar (the image viewed by others during meetings) by uploading an image/photo to replace the default display of user initials.

7.4 Discuss the privacy risks related to individual participation and redress? How were these risks mitigated?

Privacy risk related to participation and redress is minimal because WebEx Meetings is not a system of records and information collected to participate in a WebEx meeting is limited to name and email address.

Section 8: Security

8.1 Does the project or system involve an online collection of personal data?

- No – WebEx is a meeting conferencing system and does not collect personal data other than name and email address to permit individuals to join a meeting.
- Yes
Public
URL:

8.2 Does the site have a posted privacy notice?

- No
- Yes
- N/A

8.3 Does the project or system use web measurement and/or customization technologies?

- No
- Yes, but they do not collect PII
- Yes, and they collect PII

Section 9: Accountability and Auditing

9.1 Describe what privacy training is provided to users, either general or specific to the system or project.

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All internal SEC users receive initial privacy training and are required to complete this training annually. Additionally, the SEC Rules of the Road ensure that employees and contractors are aware of their security-related responsibilities and how to fulfill them

9.2 Does the system generate reports that contain information on individuals?

- No
- Yes

9.3 Do contracts for the system include Federal Acquisition Regulation (FAR) and other applicable clauses ensuring adherence to the privacy provisions and practices?

- No
- Yes
- This is not a contractor operated system

9.4 Does the system employ audit logging or event logging?

- No
- Yes

9.5 Given the sensitivity of the PII in the system, manner of use, and established safeguards, describe the expected residual risk related to access.

There is no residual risk related to access because the PII collected to join a meeting is minimal and not considered sensitive. The security mechanisms in place adequately protect the data.