

DATA PROTECTION NOTICE – MIRO (VIRTUAL WHITEBOARD SOFTWARE)

Eucon uses the whiteboard software Miro to conduct interactive virtual online meetings. Miro is a service of RealtimeBoard Inc. dba Miro, headquartered in the U.S.A. The tool is used to conduct interactive group work virtually (whiteboard for real-time collaboration).

Data controller and data protection officer

Responsible relating directly to the implementation of the online meetings is

Eucon Digital GmbH
Martin-Luther-King-Weg 2
48155 Münster

-hereinafter Eucon-

You can contact our data protection officer at the above postal address indicating “To the data protection officer” or at the e-mail address: dataprivacy@eucon-digital.de.

If you access the website www.miro.com or if a page of www.miro.com is integrated in the context of a video conference, the provider of Miro shall be responsible for the data processing. You will find information on Miro’s privacy policy [here](#).

Purpose and legal basis of processing

The legal basis for the processing of personal data of employees by Eucon is Article 6 (1)(b) GDPR. It is used for internal collaboration and internal exchange.

To the extent that an online meeting is conducted in the context of contractual relationships, the legal basis for data processing is Article 6 (1)(b) GDPR and serves the purpose of performing and fulfilling the contract.

During an online meeting, participants can collect, record and share topics and ideas jointly using the virtual whiteboard software Miro. If the interaction tool is used, this requires the consent of the participants to the use of data by Miro in accordance with Article 6 (1)(a) GDPR. The associated privacy policy is available on the website of RealtimeBoard, Inc. dba Miro (www.miro.com/legal/privacy-policy).

Scope and subject of processing

The scope of the data processed when using Miro depends on the information you provide before or when participating in an online meeting. You will find more information [here](#).

User details (if you participate with a registered account): First name, last name, e-mail address, password (if “single sign-on” is not used), phone (optional), profile picture (optional)

You may choose to minimize the personal information collected and stored by Miro by participating without registering an account or giving your name.

Meeting metadata: Topic, description (optional), IP address, device/hardware information

Shared content: Content shared on a Miro whiteboard is stored. This can include, for instance, text, images, drawings, audio or video files, websites, or integrations from other services.

If required for the purposes of logging results of an online meeting, content will be exported to a PDF and made available to the participants.

Aggregated data: Miro stores anonymized data about user behavior, such as the geographic location of the dial-in or the type of terminal device. This aggregated data does not allow any conclusions to be drawn about the person and is stored even after the individual user has been deleted.

Categories of recipients

External:

Miro (RealtimeBoard, Inc. dba Miro)

The provider of the service shall inevitably obtain knowledge of the above-mentioned data to the extent that this is required within the scope of the data processing agreement.

Personal data processed in connection with participation in online meetings will not be disclosed to third parties as a matter of principle, unless they are specifically intended for disclosure. Please note that content from online meetings, as well as from face-to-face meetings, is often used to communicate information to customers, prospects or third parties and is therefore intended for disclosure.

Internal:

Internal recipients include participants and employees who require the data for their activities within the scope of fulfilling their tasks. Further recipients may exist in the event that we are legally required to disclose the data.

Data transfer to a third country

Miro is a service rendered by a provider from the United States. Processing of personal data may therefore also take place in a third country. We have concluded a data processing agreement with the providers, incorporating the EU standard contractual clauses. For the processing of data in the U.S.A. and for the processing of personal data, e.g. in the event of a support task, the level of protection is guaranteed by the application of the EU standard contractual clauses.

Storage period of the personal data

The processed data shall generally be deleted as soon as its processing is no longer necessary. A requirement may exist in particular if the data is still needed in order to fulfill contractual services, to verify and grant or defend against warranty and, if applicable, guarantee claims. In the event of statutory retention obligations, deletion shall only be considered after expiry of the respective retention obligation.

If no recording is made, the audio and video data shall be deleted immediately; otherwise, as a rule, after one year. If the recording is based on consent, the deletion shall take place upon its revocation.

Rights of the data subject

Every data subject has the right to information under Article 15 GDPR, the right to rectification under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to restriction of processing under Article 18 GDPR and the right to data portability under Article 20 GDPR. In order to exercise the aforementioned rights, you can contact the bodies named under section 1.

If you have given us your consent to data processing, you can revoke this informally at any time. To do this, you can contact the body named under section 1.

If we process your data to protect legitimate interests, you can informally object to this processing on grounds relating to your particular situation at any time. To do this, you can contact the body named under section 1.

Right of complaint

In addition, there is a right to lodge a complaint with a data protection supervisory authority (Article 77 GDPR).

Automated decision-making

There shall be no automated decision-making or profiling.