



January 19, 2022

To: Human Rights Watch, Children's Rights Division

Thank you for contacting Cisco. We appreciate the opportunity to provide input to this important research. In our effort to provide a comprehensive response to Human Rights Watch, please find our information organized into the following sections:

- Executive Summary
- Question and Answer Detailed Summary
- Additional Resources

We welcome any requests for additional information as well as recommendations you may have for Cisco.

Executive Summary

Cisco has long recognized corporate responsibility to respect human rights, and our Human Rights Policy formalizes our commitment to uphold and respect these rights. We are committed to the UN Guiding Principles on Business and Human Rights and uphold and respect all internationally recognized human rights as contained in the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the eight core International Labour Organization (ILO) conventions. Moreover, with respect to our education offerings and otherwise, Cisco is committed to respecting children's rights, as outlined in our [Global Human Rights Policy](#).

Cisco believes privacy is a fundamental human right, and our products, including Webex by Cisco ("Webex"), are designed with privacy and security front of mind. Cisco strives to be best in class with regards to transparency; as part of that, we disclose our policies and practices around privacy and data security, including what customer data we collect and process, why we process such data, and what we **do not do** with that data. In the *Additional Resources* section, please find several items that address privacy for the use of Webex in educational settings.

Cisco has provided detailed responses to your questions in the sections that follow. In brief:

- Cisco is committed to transparency, our users' right to privacy, and to children's rights.
- Cisco data practices are publicly available and designed with accessibility and clarity in mind.



- Cisco does not use or sell data collected through Webex for advertising, behavioral advertising, or any other similar purpose.
- Cisco does not use Webex user data for profiling purposes and we do not share user data with third-party advertising technology companies.

We hope that our responses help clarify your findings with regard to data processing within the Webex apps and further illustrate Cisco's deep respect for children's rights.

Question and Answer Detailed Summary

Human Rights Watch Inquiry:

1. Human Rights Watch detected Cisco Webex's app collecting users' Android Advertising ID and International Mobile Equipment Identity (IMEI) numbers, and engaging in ID bridging between the two; collecting users' precise location data, time of current location, last known location, coarse location, and WiFi SSID; collecting information about users' contacts, including any profile photos; collecting users' phone numbers and call logs; accessing users' cameras and microphones, and having 3 embedded SDKs. Can you confirm this?
 - a. If our observations are accurate, can you please explain if, and why, you consider these data practices to be proportionate and necessary for children's education?
 - a. Does Cisco fully disclose these data practices to its users in clear, accessible language?

Cisco's response:

Our response addresses the following Webex services: Webex Meetings, Webex Messaging, Webex Events, Webex Training, and Webex Calling. Cisco's Privacy Data Sheets for those services are available through Cisco's [Trust Portal](#) and disclose Cisco's data practices in clear and accessible language. In addition to these existing resources, we performed a deep-dive analysis to address the specific elements raised by Human Rights Watch. Based on our current understanding of the elements and terms in your letter and our current operation of Webex, we can confirm the following:



Webex **does not**:

- Collect Android Advertising ID;
- Collect International Mobile Equipment Identity (IMEI) numbers;
- Engage in “bridging ID” between Android Advertising ID and IMEI number;
- Collect users’ precise location, last known location, or coarse location;¹
- Collect users’ call logs.

Webex **does**:

- Collect information about the users’ contacts, if permission is granted by the user, including profile photos of those contacts, to provide a better user experience;
- Collect users’ phone numbers, when a user utilizes Webex Calling within the App, which is necessary to establish communication and provide the service;
- Access users’ cameras and microphones to provide picture and audio during a Webex Meeting or call, or to discover and pair Webex Video & Conference Room devices based on an ultrasound pairing code, but only if permission is granted by the user. Users can withdraw their permission and disable these features at any time;
- Collect the time at the user’s current location, from the clock on the user’s device, to provide the service;
- Collect WiFi SSID, for the purpose of provisioning emergency call (E911) services when a user utilizes Webex Calling;²
- Include a subset of the following SDKs, depending on the operating system a user is using to access Webex: Backtrace, Firebase, Amplitude, AppDynamics, and CloudCherry. These SDKs are utilized to provide and improve upon the service, for example to quantify user metrics. Those SDKs are not used for advertising or marketing.

In sum, the data elements raised by Human Rights Watch that Cisco collects from users are necessary for provisioning of certain Webex services and such collection is optional to the user or is only activated by specific circumstances. All specified functions are necessary to provide various Webex services (Webex Calling, Webex Meetings, Webex Events, Webex Training, and Webex Messaging), including the optional features that users may elect to use. For more information about the scope of those services, you can also reference the product-specific terms found in our Webex Offer Descriptions, linked [here](#).

¹ While Webex does not generally collect precise location, there is an optional “driving mode” feature on Webex applications operating on an Android device that, if enabled, will collect user’s precise location to detect if someone is driving and put the application into driving mode.

² To be clear, neither Webex Meetings nor Webex Messaging—what we believe most educators use over the Webex Calling functionality—collect precise user location and other location-related elements described above. “Geolocation,” as noted in the relevant Webex Privacy Data Sheets, refers to a country code based on IP address; it does not refer to a precise user location, for example coordinates or address.



Human Rights Watch Inquiry:

2. Are any children's data collected by Cisco Webex used for advertising, behavioral advertising, or other commercial purposes?

Cisco's response:

No. Cisco does not use any children's data collected through Webex for advertising, behavioral advertising, or any other similar purpose. Cisco may directly market Cisco products and/or services to Webex users, but users must opt into those types of marketing communications. To learn more about the limited purposes for which Cisco does use the information collected via Webex, see Cisco's Privacy Data Sheets, linked below in *Additional Resources*.

Human Rights Watch Inquiry:

3. Does Cisco engage in user profiling? If so, does Cisco Webex collect or receive additional data about its users from other sources that it adds to the profiles it holds on its users?

Cisco's response:

Cisco does not use Webex user data for profiling purposes.³

³ Some versions of Webex may include a feature called People Insights, which allows users to enrich their profiles within Webex with public data via a targeted data discovery process. However, People Insights is not activated for educational organizations, and it is not included in the version of Webex that was rolled out to educational organizations. Additionally, any customer—education organization or otherwise—can request that People Insights be disabled for their organization at any time.



Human Rights Watch Inquiry:

4. Does Cisco share children's data with third party advertising technology companies or other parties? If so:
 - a. Who are they?
 - b. Have you placed contractual obligations or stipulations on these third parties regarding how they may use the data they receive from you, and with whom they may further share this data? If so, how do you monitor compliance?
 - c. Have you notified the third party that they are receiving children's data?

Cisco's response:

Cisco does not share user data, including minor's user data, with third-party advertising technology companies or to other third parties for advertising purposes. Cisco does rely on certain third-party sub-processors to provide the Webex Meetings and Webex App services; those sub-processors are listed in Cisco's Data Privacy Sheets (available on the Trust Portal) used exclusively for the provisioning and improvement of our services. Those sub-processors are notified that they are receiving customer personal data, which includes data belonging to minors. Furthermore, sub-processors are subject to data processing agreements (DPAs) that, among other things, include specific restrictions on the purposes for which our sub-processors may use, as well as measures that must be implemented to safeguard, such data.

Additionally, users can elect to integrate various third-party services with Webex, to enhance their user experience. A user or user administrator controls the integration of those third-party services, and their use of such integrations is subject to separate terms between the user and/or the user's organization and the relevant third party.

In closing, Cisco is committed to our users' privacy and to transparency, and we welcome any recommendations you identify through this research.



Additional Resources

We invite you to review the resources below for further information:

[Webex Meetings Privacy Data Sheet](#)

[Webex Messaging Privacy Data Sheet](#)

[Webex Calling Privacy Data Sheet](#)

[Webex Security & Privacy for Education White Paper](#)

[Cisco Collaboration for Education – Administrator Privacy and Security FAQ](#)

[Cisco Collaboration for Education – Parent and Guardian Privacy and Security FAQ](#)

[Webex Security Advantage White Paper](#)

[News Release: Cisco Establishes Industry Trust Benchmark for Digital Transformation](#)