

The Trustworthy Cloud

Webex by Cisco – and the EU Cloud Code of Conduct

Privacy is a fundamental human right. This principle guides how we do what we do at Cisco and it's why we embed privacy and security into our products and cloud services.

In an increasingly complex world, customers no longer trust that their data is safe just because a cloud service provider (CSP) says so. As outlined in the [New Trust Standard](#), customers expect (and even demand) that CSPs prove they are being good stewards of their data by applying the proper privacy and security controls and having compliance validated by an external third party.

In May 2021, the [EU Cloud Code of Conduct](#) (EU Cloud CoC), was formally adopted by the Belgian Data Protection Authority, following approval by representatives of all 27 of the EU member states' data protection authorities in the European Data Protection Board (EDPB). The EU Cloud CoC defines a foundational framework for privacy and security in cloud environments. This Code is designed to engender trust in the cloud and simplify customer risk assessments of CSPs. Cisco is proud to have been a founding member of the EU Cloud CoC's General Assembly and a key contributor in developing this important, new framework and helping to make privacy principles actionable and real. We are excited that Webex is the first cloud collaboration platform whose declaration of adherence to the Code has been officially verified and approved.

What is the EU Cloud Code of Conduct and why is it important?

The EU Cloud CoC is the first transnational, EDPB-approved, verifiable assurance framework for CSPs to demonstrate adherence to GDPR. Working in concert with the European data protection authorities and the European Commission, the EU Cloud CoC's General Assembly created an officially recognized code that harmonizes interpretation of the law and application to all cloud offerings. By leveraging international standards, like ISO 27701 and 27018, the EU Cloud CoC ensures wide recognition and ease of verification against data protection expectations and regulations on a global basis. The EU Cloud CoC sets clear, actionable controls for CSPs and includes an independent monitoring function to assess compliance.

Without user trust, cloud services cannot reach their full potential for transforming the way we work, live, play, and learn. Adherence to the EU Cloud CoC enables hundreds of millions of EU users to safely participate in digitization, innovation, and economic growth.

Webex – a blueprint for compliance

When developing the EU Cloud CoC, the General Assembly wanted to make sure that it would be scalable and accessible for any sized organization to comply. We also wanted the EU Cloud CoC to be globally interoperable to meet EU/GDPR requirements and align to other internationally recognized frameworks. The International Organization for Standardization (ISO) and its security related certifications were a natural fit as security is foundational to privacy. Anchoring on ISO standards, the CoC adds individual rights and privacy controls that CSPs must implement. By building on familiar, rigorously tested industry standards, the CoC is poised to be widely accepted and rapidly adopted.

Webex was built with privacy and security by design and is certified as compliant with ISO 27001, 27017, 27018, 27701, SOC 2, C5, EU Binding Corporate Rules, and APEC Cross Border Privacy Rules System and Privacy Recognition for Processors requirements. With this foundation set, Webex was able to declare adherence to the EU Cloud CoC immediately after the European data protection authorities approved it.

SCOPE Europe has verified Webex's adherence by reviewing and confirming compliance with all 80 EU Cloud CoC controls holistically covering contractual, organizational, and technical requirements. This rigorous review and verification process is necessary for validation and trust in the EU Cloud CoC. For further information about the adherence of Cisco Webex to the EU Cloud Code of Conduct (Level 2), please refer to the [Verification of Declaration of Adherence](#).

Privacy by design. Trust through transparency.

Security and privacy by design were central to the development of the EU Cloud CoC. Cisco's experience and leadership in privacy engineering were instrumental in ensuring that controls were applied to the EU Cloud CoC to embed privacy from the onset – during the ideation and development phase. Privacy requirements are treated like any other core product feature in the product development process. Privacy by design and default and privacy impact assessments are essential in the development process and throughout the data lifecycle.

In practice, the principles of privacy by design and default are embedded in the [Cisco Secure Development Lifecycle \(CSDL\)](#), a repeatable and measurable process designed to increase our product resiliency and trustworthiness. This secure development lifecycle uses a combination of people, processes, and tools throughout the product development process to help deliver on our principles of trust, transparency, and accountability. Since these are also key principles under the GDPR, we shared the leading practices and programmatic results of our CSDL process in developing the EU Cloud CoC. This included our training program for establishing a culture of security and privacy awareness across Cisco, and transparently sharing our [Privacy Data Sheets and Privacy Data Maps](#) with customers to show how we properly collect, process, use, and dispose of their personal data.

What's next for Cisco and the Code?

Cisco continues to work with other members of the General Assembly to develop and enhance mechanisms and leading practices to demonstrate compliance and facilitate safe international data flows. We also take the lessons we are learning from our peers and are integrating them into our own processes, including updating the CSDL. We look forward to welcoming more members to the EU Cloud CoC and expect many more adherence declarations from CSPs in the coming months.