

Recording and transcription of Microsoft Teams Meeting Privacy Notice

This privacy notice is designed to help you understand how companies in the Steer Group of companies (“Steer”) processes your personal data when you attend a meeting on Microsoft Teams (MS Teams) that is recorded or transcribed.

Whose personal data do we process?

When a MS Team meeting is recorded and transcribed, we will process the personal data of the individuals who are in attendance at that meeting. This may include:

- Employees
- External participants

What type of personal data do we process?

When you attend a MS Teams meeting that is recorded or transcribed using AI, the personal data we process may include:

- Your name / username
- Your photograph (if you have one associated with your MS Teams profile)
- Your email address
- Your participation in the meeting, including video/background images/audio/chat/reactions

The meeting organiser/chair will advise participants verbally before the recording commences that they are able to turn off their camera or use the chat function if they do not want their face /voice to be included in the recording. You may also be asked to give your consent to the recording by clicking accept prior to participating in the call. For further information on AI transcription and how to hide your identity in the meeting captions, please see: [View live transcription in Microsoft Teams meetings](#) and [Hide your identity in meeting captions](#) and transcripts in Microsoft Teams.

Why do we process personal data?

Steer may need to record or transcribe a MS Team meeting so that a formal record is made of the meeting, for minute taking purposes or for future use and circulation. Where a MS Teams meeting is recorded or transcribed the meeting organiser/ chair will inform the participants that the MS Teams meeting will be recorded or transcribed before the recording or transcription commences.

Where do we get your personal data from?

The personal data processed in a MS Teams recording of transcription will relate to the individuals attending the meeting through their attendance.

Who do we share your personal data with?

MS Teams recordings may be shared internally within Steer. If Steer is recording a meeting in the course of providing services to one of its clients, it may be that the client has the

contractual right to call for materials produced in the course of Steer providing those services.

How are the recordings and transcripts held and for how long?

Recordings and transcripts are held in the Microsoft 365 cloud for 60 days before they are deleted and can only be accessed by Steer members that attended the MS Teams meeting. Guests and people from outside Steer do not have access. However, if Steer is recording a meeting in the course of providing services to one of its clients, it may be that the client has the contractual right to call for materials produced in the course of Steer providing those services. The transcript may also be used to create action notes or minutes to be shared with invitees (or, with the attendees' consent, other groups who have a legitimate interest in receiving the action notes or minutes).

If you are in the UK/Europe, then the following further elements of the privacy notice apply:

What is the legal basis for MS Teams Recordings?

For most MS Teams meetings, the lawful basis will be legitimate interests i.e. the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. We may also ask for consent. There is no requirement for you to be recorded and the meeting organiser / chair will advise participants before the recording commences that they are able to turn off their camera or use of the chat function if they do not want their face/ voice to be included on the recording. Please do this if you do not wish to be recorded. If you wish to object to the processing of your personal data in this way, you may do so by contacting the meeting organiser.

What are your rights in respect of the processing of your personal data?

You have the following rights relating to your personal data. Some of these rights are not absolute and may only apply in certain circumstances. If you have any questions or wish to exercise any of your data protection rights, please contact privacy@steergroup.com.

- The right to be informed about how we are using your personal data.
- The right of access to your own ('put right') your personal data.
- The right to erasure (deletion) of your personal data.
- The right to restrict processing of your personal data.
- The right to data portability.
- The right to object to processing of your personal data.

Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time.

Steer Davies & Gleave Limited is the Data Controller. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact privacy@steergroup.com.

You also have the right to complain to a supervisory authority. You can contact the Information Commissioner's Office here:

- Helpline number: 0303 123 1113
- ICO website: <https://www.ico.org.uk>