Privacy Notice for Microsoft Teams Meeting Recordings and Transcriptions

Information pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR) for data subjects regarding Teams meeting recordings and transcriptions

The General Data Protection Regulation (GDPR) sets out comprehensive information obligations in relation to the collection of personal data. As the operator of Microsoft Teams calls, we take this responsibility seriously. When conducting meetings, both the recording and transcrip-tion functions may be used for specific purposes. In doing so, not only (technical) data relating to the call or meeting is regularly collected, but inevitably also personal data.

We would therefore like to take this opportunity to inform you of your rights under the GDPR should we have obtained your personal data (e.g. display name in Teams, initials, telephone number, email address, audio and video, spoken content, etc.) in your capacity as an employee, service provider, customer or prospective client.

In particular, we process personal data in order to reliably fulfil our contractual obligations towards all parties involved. All purposes for which we process personal data are set out below under 2.

1.) Who is responsible for the processing of my personal data and who can I contact if I have any questions? The data controller within the meaning of the statutory data protection provisions (e.g. the GDPR) for the processing of your personal data is:
Kardex Holding AG
Airgate, Thurgauerstrasse 40,
8050 Zurich, Switzerland

Our global data protection team is happy to answer any questions you may have regarding the processing of your personal data at dataprotection@kardex.com.

2.) What types of personal data are processed? For what purposes and on what legal basis is the processing carried out? When using Microsoft Teams, master data and contact details (e.g. name, display name, email address, company, role), meeting and connection data (e.g. time, duration, attendance, device/connection information), communication content (spoken words, chat, reactions, shared content) and, if the camera is enabled, video and background information may be processed.

In the case of a video/audio recording, audio, video and, where applicable, screen shares are stored permanently in a recording file.

During transcription, spoken content is automatically converted into text and regularly attributed to the identified speaker. Automatic transcripts may contain errors or omissions, or the content may be smoothed.

The personal data relating to you is processed for the following purposes on the following legal basis:

a) Project-related transcription: temporary support in the complete and accurate creation and validation of meeting minutes, RAID entries, decision lists and task lists. This type of transcription is based on our legitimate interest in state-of-the-art minute-taking assistance, following our assessment of the interests involved. In accordance with the GDPR, Article 6(1)(f) applies.

b) Video/audio recording: exclusively for the purpose specified separately in the meeting invitation, e.g. making the recording available to participants who were unable to attend or for training purposes. General, routine recording is neither intended nor permitted.

Video/audio recording is, as a matter of principle, based solely on a separately defined legal basis. Where we therefore require your consent, Article 6(1)(a) of the GDPR applies; consent may be withdrawn at any time with effect for the future.

None of the aforementioned processing operations are carried out for the purposes of performance or conduct monitoring, the creation of individual personalized verbatim transcripts, or for any other incompatible purposes.

Unauthorized recording of non-public speech is prohibited. You will therefore always receive transparent information in advance and a further reminder before the technical start.

The legal basis is established for each instance before activation.

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3.) Will my personal data be disclosed to other recipients? Access is granted only to those who require it for the specific purpose, in particular the organizer, the authorized minute-taker and explicitly defined roles. Final minutes and action lists are distributed only to the intended group of participants and stakeholders.

Microsoft processes data as the provider of the Microsoft 365/ Teams services in accordance with the contractual agreements applicable to Kardex. Other service providers, group companies or project partners, may only access the data if the role, purpose, necessity, authorisation and contractual basis have been documented in advance.

4.) Is my personal data transferred to or within third countries? Where recipients or service providers outside the EU/EEA or Switzer-land are granted access, the transfer will only take place on the basis of an applicable adequacy decision or suitable safeguards, in particular EU Standard Contractual Clauses, and, where necessary, additional protective measures. The specific list of recipients and the legal basis for the transfer are documented for the respective meeting setup.

5.) For how long will my personal data be stored? Raw transcripts and technical intermediate artefacts generated for this purpose are deleted immediately following the creation and technical validation of the final minutes and the RAID/ action list (human-in-the-loop), but no later than 60 days (automatically).

Video and audio recordings will be deleted after the period specified in the invitation. Retention for several years, for example for training or onboarding purposes, requires a separate assessment of necessity and legal basis and is not envisaged.

Final minutes, decision lists and task lists will be stored in accordance with the specific time limits applicable to them. Statutory retention and archiving obligations, as well as lawful legal holds, remain unaffected

6.) What rights do I have regarding the processing of my personal data? Data subjects have the right, subject to the statutory conditions, to access (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), data portability (Art. 20 GDPR), to object to processing based on Art. 6(1)(f) GDPR (Art. 21 GDPR) and to withdraw consent with effect for the future (Art. 7(3) GDPR). Enquiries may be addressed to dataprotection@kardex.com.

You have the right to lodge a complaint with a competent data protection supervisory authority. Which authority is competent depends, in particular, on the Kardex company responsible and your place of residence or work.

The address of the lead supervisory authority responsible for our company is:

The State Commissioner for Data Protection and Freedom of Infor-mation, Baden-Württemberg
PO Box 10 29 32, 70025 Stuttgart
Email: poststelle@lfdi.bwl.de
Website: http://www.baden-wuerttemberg.datenschutz.de

7.) Is the provision of personal data required by law or contract, or is it necessary for the conclusion of a contract? Is there an obligation to provide personal data, and what are the possible consequences of failing to do so? No. There is no obligation to attend the relevant meetings. Without face-to-face communication with the relevant staff members – or, where necessary, other third parties – the contractual relationship may not be able to be concluded or fulfilled. Attendance at a meeting may be required for work-related or contractual reasons. This does not automatically imply an obligation to consent to video or audio recording. Where consent is required, an equivalent, practicable alternative will be offered where possible. In the case of transcription based on legitimate interests, data subjects may object on grounds arising from their particular situation. The data controller will then assess the individual case and the possible alternative means of participation.

8.) Is automated decision-making, including profiling, carried out? There is no exclusively automated decision-making, including profiling, within the meaning of Article 22 of the GDPR. Automatically generated transcripts are reviewed by an authorised person (human-in-the-loop) before being incorporated into a final report or a list of measures.

9.) From which sources (including public sources) does the pro-cessed personal data originate? The data is generally collected directly from the meeting participants in the course of their participation. Participant and contact details may also be obtained from Microsoft 365, the company account, the invitation or from information provided by the sending organization.

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Information regarding your right to object under Article 21 of the GDPR:

You have the right, on grounds relating to your particular situation, to object at any time to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(f) of the GDPR (data processing based on a balancing of interests). If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, or the processing serves to establish, exercise or defend legal claims.

You have the right to object at any time to the processing of personal data for marketing purposes. If you object to processing for marketing purposes, we will no longer process your personal data for these purposes.

Objections may be submitted in any form to the following addresses: dataprotection@kardex.com