

## **Data protection statement on the processing of personal data in the context of capturing the transcription of MS Teams meetings by the external service provider of the RFPSS investment management platform**

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identify you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

### **1. What is the nature and purpose of the processing operation?**

This data protection statement relates to the processing of the recording of MS Teams meetings by the external service provider so the transcript of the recording can be used to ensure the action log of open enhancements or ongoing issues is kept accurate.

MS Teams is a cloud-based application to organise virtual meetings and teleconferences and allows the recording of virtual meetings and the use of live captions and transcriptions.

This data protection statement explains how the external service provider of the RFPSS investment management platform processes personal data obtained by recording and transcription as an external processor on behalf of Principal Directorate (PD) Administration of the Reserve Funds.

Personal data, e.g. name, voice statements and video images, are processed for the purpose of generating a transcript used to complete and maintain the action log of defects encountered or enhancements requested. The transcript is a fallback to ensure completeness, given the technical complexity of the discussions.

The processing is not intended to be used for any automated decision-making, including profiling.

Recording and transcription of MS Teams meetings is done by the external processor, under the responsibility of the Principal Director Administration of the Reserve Funds. Personal data will not be transferred to recipients outside the EPO not covered by Article 8(1), (2) and (5) DPR unless an adequate level of protection is ensured. Where this is not the case, transfer can only take place if appropriate safeguards have been put in place and enforceable rights and effective legal remedies are available, or derogations for specific situations as per Article 10 DPR apply.

## 2. What personal data do we process?

The following categories of personal data are processed specifically for the purpose of generating transcripts of MS Teams meetings: name and surname, work email address, voice recording of statements made and video images of participants.

## 3. Who is responsible for processing the data?

Personal data are processed by the external service provider, under the responsibility of the Principal Director Administration of the Reserve Funds, acting as the EPO's delegated data controller.

## 4. Who has access to your personal data and to whom are they disclosed?

Personal data are disclosed on a need-to-know basis to the external third-party service provider, specifically the following recipients: the Senior Delivery Manager and the Principal Client Success Manager.

Recordings and transcripts of MS Teams meetings will not be provided to any EPO staff.

Personal data will only be shared with authorised persons responsible for the necessary processing operations. They will not be used for any other purposes or disclosed to any other recipients.

## 5. How do we protect and safeguard your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss or alteration and unauthorised disclosure or access.

For personal data processed on systems not hosted on EPO premises, the providers processing the personal data have committed in a binding agreement to comply with their data protection obligations under the applicable data protection legal frameworks. The EPO has also carried out a privacy and security risk assessment. These systems are required to have implemented appropriate technical and organisational measures such as: physical security measures, access and storage control measures, securing data at rest (e.g. by encryption); user, transmission and input control measures (e.g. network firewalls, network intrusion detection system (IDS), network intrusion protection system (IPS), audit logging); conveyance control measures (e.g. securing data in transit by encryption).

Specific measures relating to the recording of MS Teams meetings:

Where a virtual meeting is recorded, participants can limit the processing of their personal data by activating/de-activating their microphone and camera. In addition, where there are legitimate grounds, participants can also ask via the chat feature for the recording to be temporarily suspended so that they can contribute without being recorded.

## 6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If you would like to exercise any of these rights, please write to the delegated data controller at [RFPSS-DPL@epo.org](mailto:RFPSS-DPL@epo.org). In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this form (depending on the data subjects concerned, please include all applicable forms: [form](#) (for external third-party service

providers) or [form](#) (for staff members of the Principal Directorate Administration of the Reserve Funds) and submit it with your request.

We will reply to your request without undue delay and in any event within one month of receipt of the request. However, Article 15(2) DPR provides that this period may be extended by two further months where necessary in view of the complexity and number of requests received. We will inform you of any such delay.

## **7. What is the legal basis for processing your data?**

Personal data are processed on the basis of DPR Article 5(a): processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning.

## **8. How long do we keep your data?**

Personal data will be kept only for the time needed to achieve the purposes for which they are processed.

Personal data in the form of video recordings and transcripts of MS Teams meetings will be deleted once the action log has been completed.

Personal data will be stored for a maximum of two weeks. The external service provider will confirm deletion recording and transcripts of MS Teams meetings to the assigned Data Protection Liaison Officer within the Principal Directorate Administration of the Reserve Funds by sending an email to [RFPSS-DPL@epo.org](mailto:RFPSS-DPL@epo.org).

## **9. Contact information**

If you have any questions about the processing of your personal data, please write to the delegated data controller of the Principal Directorate Administration of the Reserve Funds at [RFPSS-DPL@epo.org](mailto:RFPSS-DPL@epo.org).

You can also contact our Data Protection Officer at [dpo@epo.org](mailto:dpo@epo.org).

## **Review and legal redress**

If you consider that the processing infringes your rights as a data subject, you have the right to request review by the controller under Article 49 DPR and, if you disagree with the outcome of the review, the right to seek legal redress under Article 50 DPR.