

Privacy Notice: Transcription and recording of meetings

Privacy notice for participants in Microsoft Teams meetings

At a glance

- **This meeting will be transcribed (and/or recorded) where the host has enabled within Teams as part of our standard ways of working.** Where active, Microsoft Teams will display an on-screen indicator prior to the start of any transcription (and/or recording), giving access to this notice. Participation in meetings, including the use of audio and (where required under our ways of working) video, forms part of our standard approach to collaboration and service delivery.
- **What we capture:** an automated written transcript and/or an audio/video recording, screen sharing content, chat messages exchanged during the call, including your name, what you say and (if on camera) your image.
- **Why:** to keep an accurate record of customer, project, and team meetings, as part of our standard operational controls, to log relevant information in our systems, to manage service communications and updates, and to improve how we work.
- **Our lawful basis:** our legitimate interests (explained below).
- **Who controls it:** only the host and any co-host may start transcription or recording. Participants may view the transcription, and any AI summary created by Teams.
- **How long:** recordings and transcripts are kept in our Microsoft 365 environment for 120 days and then deleted.
- **Transcription preference:** we will elect to use transcription only for our meetings wherever possible.

1. Who is responsible for your information

This notice is provided by **Tecknuovo Ltd**, Company No. 9611416 (“we”, “us”, “our”), which is the controller for the personal data described here.

Our offices: 6 St Andrew Street, London EC4A 3AE | Registered: 20-22 Wenlock Road, London N1 7GU

If you have any questions about this notice or how we handle your personal data, please contact us at compliance@tecknuovo.com.

Further information about how we process personal data, including your rights and our general retention practices, is available in our main Privacy Notice.

2. When this notice applies

This notice applies where live transcription and/or recording is enabled during Microsoft Teams meetings that form part of our internal operations, consultant delivery, and customer engagements.

This notice is provided so that participants understand how and why recording and/or transcription is used as part of our standard operational practices before it is enabled.

3. What we record and transcribe

Depending on what the host turns on, we may collect:

- **Audio and/or video recording** of the meeting, including your voice and, if your camera is on, your image.
- **An automated transcript** – a written record of what is said, attributed to each speaker by name.
- **Meeting metadata** such as the date, time, duration, meeting title and the names of participants.
- **Any content you share or say**, including chat messages and shared screens where these form part of the recording.

4. Why we record and transcribe meetings

We use recordings and transcripts of customer and project meetings to:

- **Maintain an accurate record** of what was discussed, agreed and actioned.
- **Log relevant information in our systems** (for example our CRM and project records), so that the right people have an accurate account of the engagement.
- **Operate consistent delivery controls** across our engagements, including maintaining auditable records of meetings.
- **Manage service communications and updates** relating to our systems and the services we provide.
- **Support continuous improvement** of our services, ways of working and the quality of our delivery.

5. Our lawful basis: legitimate interests

We rely on our **legitimate interests** (Article 6(1)(f) of the UK GDPR) as the lawful basis for this processing. Our legitimate interests are in keeping accurate records of our engagements, delivering and improving our services, and managing communications with customers and colleagues efficiently and reliably.

We have assessed these interests against your rights and interests and consider that the processing is proportionate, given the limited access controls and short retention period described in this notice.

We do not rely on consent for this processing. Recording and transcription are carried out as part of our legitimate business activities and service delivery model. Participation in meetings where recording or transcription is used may be necessary to support our operations and service delivery. Recording and transcription are applied consistently across relevant meetings as part of how we deliver our services and maintain appropriate records.

Your right to object. Because we rely on legitimate interests, you have the right to object to this processing on grounds relating to your situation. We will consider any objection in line with our legal obligations.

6. How recording and transcription are controlled

We apply the following controls to keep this proportionate and under control:

- **Standard operational use.** Transcription (and/or recording) are used as a standard approach for documenting meetings across our business, where enabled by the host or co-host.
- **Host-only activation.** Only the meeting host or co-host can start recording or transcription. Other participants cannot.
- **Visible indicator.** Microsoft Teams displays an on-screen indicator whenever recording or transcription is active.
- **Host-only download.** Only the host or co-host can download the transcript. All other participants have view-only access.
- **Limited storage location.** Recordings and transcripts are stored and processed within our managed Microsoft Office 365 environment and Microsoft Azure tenancy, protected by our standard access and security controls.
- **Aligned ways of working.** Participation in meetings, including the use of audio and video where required, is governed by our internal policies and engagement terms, and is expected as part of effective collaboration and service delivery.

Recordings and transcripts are stored within our Microsoft Azure and Office 365 environment. This may involve storage and processing within the United Kingdom and European Economic Area, and in some cases access by authorised personnel or service providers outside these regions. Where personal data is accessed or transferred outside the United Kingdom, we ensure that appropriate safeguards are in place in accordance with UK data protection law, including the use of approved transfer mechanisms. Recording and transcription are enabled and managed by the meeting host in accordance with our internal policies.

7. Who we share recordings and transcripts with

Access is limited to the host and to those within Tecknuovo who have a genuine business need, in line with our access controls. We may also share recordings or transcripts where necessary, for example:

- **With our service providers,** including Microsoft, which provides the Microsoft 365 and Teams platform on our behalf under a data processing agreement.
- **With the relevant customer,** where a meeting relates to a customer engagement, and it is appropriate to share the record with them.
- **Where we are required to do so by law,** or to establish, exercise or defend legal claims.

Access from outside the UK. Some of our colleagues or trusted suppliers who support our systems may be located outside the UK. Where personal data is accessed from outside the UK, we put in place an appropriate safeguard – such as the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses – to make sure your data remains protected.

8. How long we keep recordings and transcripts

Recordings and transcripts are retained within our Microsoft 365 environment for 120 days from the date of the meeting, after which they are deleted. In some circumstances, recordings or transcripts may be retained for longer where necessary for legal, regulatory or contractual purposes, or where required to establish, exercise or defend legal claims. Where specific information from a meeting needs to be retained for longer (for example a logged action or decision recorded in our systems), that information is kept in line with the retention period applicable to those records.

9. Sensitive or special category information

Please avoid sharing sensitive personal information (for example about health, or other special category data) during recorded or transcribed meetings unless it is necessary. Where a meeting is likely to involve sensitive matters – for example HR or disciplinary discussions recording or transcription should be considered separately and a specific basis and notice applied.

Where recording or transcription is not appropriate, it must not be enabled, and alternative approaches should be used.

10. AI/Automated Transcription

Transcriptions are generated using automated tools within Microsoft Teams. These tools may involve automated processing of spoken content into text; however, they are used to support meeting records and are not used to make decisions about individuals without human involvement.

11. Your rights

You have rights over your personal data, including the right to:

- **Object** to processing based on our legitimate interests, on grounds relating to your situation.
- **Access** a copy of the personal data we hold about you.
- **Rectify** inaccurate personal data, or have incomplete data completed.
- **Erase** your personal data in certain circumstances.
- **Restrict** our use of your personal data in certain circumstances.

To exercise any of these rights, contact us at compliance@tecknuovo.com.

12. If you do not want to be recorded

If you have concerns about recording or transcription, you can raise these with the meeting host or contact us using the details above. We will consider concerns on a case-by-case basis in line with our legal obligations. Where recording or transcription is necessary for our operations or service delivery, it may not be possible to provide an alternative approach, and participation in such meetings may be required to collaborate effectively and fulfil project or engagement responsibilities.

13. How to complain

If you have concerns about how we handle your personal data, please contact us first so we can try to put things right. Please contact us at compliance@tecknuovo.com. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at ico.org.uk or by calling 0303 123 1113.

Version Control

NUMBER	DESCRIPTION OF CHANGE	VERSION	DATE	CHANGED BY	APPROVED BY
1.	CURRENT VERSION	V1.0	062026		Sara McCracken CLOO