# **Privacy Notice**

# **Business Communication Platform Transcription Privacy Notice**

The University currently uses business communication platforms such as Microsoft Teams, Zoom etc. for conducting internal and external meetings, both formal and informal in nature. Meetings can be between staff, with third parties, formal committee meetings as well as for learning and teaching purposes by academic members of staff.

Once turned on in a Microsoft Teams meeting by a meeting organizer or participant, the transcript feature will automatically transcribe speech in the meeting (in near-real time). This can help with notetaking and leverages accessibility benefits.

In all case, the meeting organiser must inform participants in advance before turning on the recording and transcription features, and also point participants to this privacy notice

**Note:** For governance related committee meetings (i.e. Council, Senate, Executive Board and their sub-committees) there are [Standing Orders for University Committees](https://unibradfordac.sharepoint.com/sites/governance-intranet/SiteAssets/Forms/AllItems.aspx?id=%2Fsites%2Fgovernance%2Dintranet%2FSiteAssets%2FSitePages%2FCommittee%2Dguidance%2FStanding%2Dorders%2D202021%2DFINAL%2DFOR%2DWEB%2Epdf&parent=%2Fsites%2Fgovernance%2Dintranet%2FSiteAssets%2FSitePages%2FCommittee%2Dguidance) in place that outline the institutional approach to recording meetings and these should be referred to in tandem with this Privacy Notice.

.

## **Under what legal basis does the processing of my personal data take place?**

The UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 provide for several different legal basis under which processing of personal data may take place. In this case, the following basis applies:

**Where the business of a meeting is in the exercise of official authority vested in the University, then refer to the Standing Orders of that Committee (see above).** The lawful basis is Article 6.1(e) of the UK GDPR.

**Where the meeting is for a small group of individuals, say a one-to one meeting between colleagues, then it will be necessary to obtain consent of everyone before recording takes place.** The lawful basis is Article 6.1.(a) of the UK-GDPR.

**For all other meetings, recording will be necessary for the purposes of the legitimate interests pursued by the University.** The lawful basis is Article 6.1 (f) of the UK GDPR – the legitimate interests in this instance, of the University.

A Data Protection Impact Assessment (DPIA) has been carried out to identify and minimize data protection risks. If you do not want your name to be attributed to in the transcripts, you can choose to hide your name and there is an option to do so within your Teams settings. However, because the legitimate interest is the University’s, an individual’s decision to opt out may be overridden where the speech transcription is necessary and required for the smooth operation of the University. A decision will be made in exceptional cases where it is considered that the person’s name is essential.

## **What categories of personal data are used?**

It is impossible to predict and guarantee words spoken during recorded and transcribed meetings, in view of this, the following categories may be processed.

* personal details
* staff / student ID number
* visual images, personal appearance, and behavior
* family details
* lifestyle, economic and social circumstances
* education details and student records
* education and employment details
* financial details
* disciplinary and attendance records
* vetting checks
* placement performance information
* racial and ethnic origin
* sex life and sexual orientation
* racial or ethnic origin
* trade union membership
* religious or other similar beliefs
* disability status and physical and mental health details
* offences and alleged offences
* criminal proceedings, outcomes, and sentences
* personal mitigating circumstances
* learner support information

## **Where do we get personal data from?**

In this case we obtain personal data from recorded and transcribed meetings.

## **Who else do we pass this information on to?**

Microsoft acts in the capacity of a processor during the use of Teams. Some of this data is directly provided, while some are obtained by collecting data about your interactions, use, and experiences with the products.

Microsoft uses the data collected in the following ways:

* Provide products, which includes updating, securing, and troubleshooting, as well as providing support. It also includes sharing data, when it is required to provide the service or carry out the transactions requested.
* Improve and develop their products.
* Personalise their products and make recommendations.
* Advertise and market, which includes sending promotional communications, targeting advertising, and presenting customers with relevant offers.

For more information, see [Microsoft Privacy Statement](https://privacy.microsoft.com/en-gb/privacystatement).

The transcript is available to meeting participants only who may then extract anyinformation necessary from it to share with other third parties. \_ Augment with statement from below

## **Do we transfer the information overseas?**

Transcripts are intended to be a tool to aid the creation of documents or files following a meeting, they should not be used as a record themselves as they are not 100% accurate. Consequently, they are for internal use and should not be transferred externally. In exceptional circumstances there may be the need to transfer the transcript overseas - Please consult the University’s Data Protection Officer ([data-protection@bradford.ac.uk](mailto:data-protection@bradford.ac.uk)) for any queries.

## **How long do we keep this information for?**

Recordings / transcripts can be deleted by the meeting organizer while locally downloaded copies will have to be deleted by individuals themselves.

The voice recordings will be retained by the University only for as long as is necessary to check the transcripts for accuracy, and the recordings will then be deleted. The transcript will be retained for 60-90days as the formal record in accordance with the University’s prevailing policies on the retention of records of meetings.

.

**What are your rights as a data subject?**

As a person whose personal data we are processing, you have certain rights in respect of that personal data. You have the right:

* To access your personal data that we process
* To rectify inaccuracies in personal data that we hold about you if it is inaccurate or incomplete
* To request the deletion or removal of your personal data where there is no compelling reason for its continued processing through a Subject Access Request (SAR)
* To restrict the processing of your personal data in certain ways
* To obtain your personal data for reuse
* To object certain processing of your personal data
* To complain to the Information Commissioner’s Office about the way in which we process your personal data.

## **Where can I get more information**

For more information please contact the University’s Data Protection Officer:

[data-protection@bradford.ac.uk](mailto:data-protection@bradford.ac.uk)  
University of Bradford  
Richmond Road  
Bradford  
BD7 1DP

|  |  |
| --- | --- |
| Written by: | Funmi Inije |
| Reviewed by DPO: | Comments provided by MS |
| Next Review Date: |  |
| Version Number: |  |