Privacy notice: Microsoft Teams

This is a privacy notice, which is based on articles 13 and 14 of EU's General Data Protection Regulation.

This privacy notice applies the use of the Microsoft Teams service in Turku University of Applied Sciences' online meetings, teamwork spaces, communications, teaching, guidance and in cooperation with internal and external users of the organization.

Controller

Turku University of Applied Sciences Ltd

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Person in charge and contact persons

Juha-Pekka Saarinen, Head of Digital Services

Contact information of the Data Protection Officer

Please contact in all data protection related matters: tietosuoja@turkuamk.fi

The messages sent to this address are processed by the Data Protection Officer (DPO) and a data protection specialist working with them and as their substitute.

Purpose of processing personal data

Personal data is processed to offer the Microsoft Teams service for users, whose user right is based on an employment relationship, right to study or external partnership.

The information in the user catalogue is used to identify users and to manage access and user rights to the Microsoft Teams service. The log data is used to carry out security of the information systems and monitoring the use.

In the Teams service, we process data for the following purposes:

- Cooperation of internal working groups
- Organizing online meetings and webinars
- Teaching and guidance and counselling events
- Expert cooperation with partner organizations

- Joint use and version management of documents
- Project management
- Communications with personnel, students and external cooperation partners

Using AI-based features

- The Copilot feature can be used in Microsoft Teams meetings. Copilot analyzes the discussion which has taken place during the meeting and if the meeting is transcribed, also the meeting transcription. It can produce a summary of the meeting and identify tasks, decisions and key conversation topics. The participants are notified of the use of Copilot in connection with the meeting.
- The purpose of processing personal data in connection with the Copilot feature is to support the documentation, information search and cooperation in the meetings, and to facilitate the identification of the tasks and decisions agreed on in the meetings.

Legal basis for processing personal data

According to the purpose of use, processing personal data is based on the following legal bases set out in Article 6 of the General Data Protection Regulation:

- **A task carried out in the public interest (6.1 e)** to carry out duties related to teaching and research and to carry out the statutory tasks of the higher education institution.

The meeting participants shall be informed before starting the recording or transcription that the meeting is recorded or transcribed. The legal basis for processing personal data included in the recordings and transcriptions is determined according to the purpose of use of the meeting according to the bases of processing described above.

Legitimate interests of the data controller or third party

Processed categories and storage times of personal data

In the Microsoft Teams service, personal data which belongs to the following categories can be processed:

User account information

- Name
- User ID
- Email address
- Organization
- Role or title

- Profile picture (if used)

Meeting information

- Meeting participants
- Times of joining and leaving the meeting
- Information on being present
- Meeting chat messages
- Files shared in the meeting

Communication-related information

- Chat messages
- Channel discussions
- Reactions
- Mentions/Tags

Files

- Files saved in Teams' teams and channels are stored in SharePoint. Files shared in Teams discussions and meeting discussions can also be saved in OneDrive according to the method of use.

Log data

- Logins
- IP address
- Device information
- Information security logs
- Information on diagnostics and use necessary for the functioning of the service, such as data on the device, version and faults. Data collection summary for Teams

Recordings

- Meeting audio
- Image
- Presentation material
- Subtitles/transcriptions

The storage times of the personal data are defined according to the group of data, the purpose of use and the information management and storage practices as follows:

Data	Storage time
Chats	According to the Microsoft 365 storage practices.
Teams' files	Documents according to the information management plan.
Logs	According to the Microsoft 365 service log practices.
Recordings	According to the storage practices defined by the organization.
Workspaces	According to the storage practices defined by the organization. Unused workspaces are deleted after a year if the owner of the workspace does not continue the operating time.
Guest users	According to the practices defined by the organization. Guest users who have not logged in in 7 months (210 days) or have not accept the guest user invitation in 90 days are deleted from the user directory.

Regular information sources

The personal data have been obtained from

- The organization's user management (Entra ID / Active Directory)
- Meeting participants
- Data provided by the guest users

Receivers or receiver groups of personal data

The receivers of the personal data are Microsoft and its accepted subprocessors to produce the Microsoft 365 service and the persons at Turku University of Applied Sciences who have a right to process the data based on their duties. In connection with Teams meetings, workspaces and communications also invited participants, guest users and cooperation partners can receive data according to their user rights. Data can be disclosed to authorities or other parties if the disclosure is based on the law or an order which obliges the data controller.

Essential information regarding transfer of data to third countries (outside the EU or EEA countries)

Personal data can be processed in Microsoft's international services. Possible transfers outside the EU/EEA area are based on data protection enforcement mechanisms approved by the European commission and on Microsoft's contract arrangements.

Principles of data protection

The protection measures of Microsoft Teams are based on the security features of the Microsoft 365 environment and Entra ID and on the technical and organizational protection measures of Turku University of Applied Sciences.

The use of the data is limited based on e.g. the users' tasks and user rights. Users are identified with multifactor authentication and the use of the system is monitored with log data. The data processed in Microsoft Teams is protected during the information transfer and when saved. The data is saved in the Microsoft 365 environment where its confidentiality, integrity and usability is protected with technical and organizational measures.

Data subjects' rights

According to the General Data Protection Regulation, the data subject has the right:

- to receive information on the processing of their personal data, unless otherwise regulated by the law
- to request for access to their personal data and rectification regarding incorrect or insufficient information
- to erase their data (not applied, if the basis for processing is compliance with a legal obligation or performance of a task carried out in the public interest)
- to restrict the processing of their data
- to object to the processing of their data, if the basis for processing is general or legitimate interest
- to request the transfer of data they have submitted themselves from one controller to another, if the basis for processing is consent or agreement
- withdraw the consent they have given
- notification obligation of the controller on the rectification/erasure/restricting of processing of personal data
- not to be subject to automated decision-making (the data subject may allow automated decision-making by their consent)

Data subjects may exercise their rights by contacting the contact person mentioned in the privacy notice or the Data Protection Officer. If necessary, the contact person and the Data Protection Officer provide more information on exercising the rights.

If processing the data does not require identifying the data subject and the controller cannot recognize the data subject without additional information, the right to inspection,

rectification, data erasure, restriction of processing, obligation to report and transmittal is not applied.

You have the right to file a complaint with the Data Protection Ombudsman's office, if you consider that valid data protection legislation has been breached in processing your personal data. Before filing the complaint, you can also contact the Data Protection Officer mentioned at the beginning of this privacy notice. The data controller processes the requests on exercising the rights on a case-by-case basis.