

# Privacy statement – Microsoft Office 365 Teams

We use the video conferencing system Microsoft Office 365 Teams to communicate via the Internet. This privacy statement explains how we process your personal data when using Teams.

## 1. Data controller and data protection officer

The data controller as defined by Art. 4 Para. 7 GDPR is:

Sto SE & Co. KGaA  
Ehrenbachstr. 1  
D- 79780 Stühlingen, Germany  
Tel.: +49 77 44 57-0  
Web: <https://www.sto.de>  
Mail: [infoservice\[at\]sto.com](mailto:infoservice[at]sto.com)

Our data protection officer can be contacted at the following address:

[datenschutzbeauftragter@sto.com](mailto:datenschutzbeauftragter@sto.com)

## 2. Processing personal data

When using Microsoft Teams for our online meetings, we process the following personal data:

- Contact information (e.g. your e-mail address if you specify an address that identifies you as an individual)
- Personal master data (if specified by you)
- Log files, protocol data
- Metadata (e.g. IP address, time of participation, etc.)
- Profile data (e.g. your user name if you provide this information of your own accord)

The chat content will be logged when using Microsoft Teams. Files that users share in chats will be saved in the OneDrive for Business account of the user who shared the file. The files that team members share in a channel will be saved on the team's SharePoint website.

## 3. The Microsoft Teams service

Microsoft Teams is a product from the Microsoft Office 365 product range, and Microsoft Office 365 is a piece of software provided by Microsoft Ireland Operations Limited:

Microsoft Ireland Operations Limited  
One Microsoft Place  
South County Business Park Leopardstown  
Dublin 18  
D18 P521 Ireland

You can use the video conferencing function offered by Microsoft Teams to participate in our meetings and online events via video and audio. We will not record the Microsoft Teams online events and meetings unless we have obtained your consent in advance.

The people who can see your audio and video feeds depend on the team modes we use:

### Live Events:

For live events, we do not allow audio or video input from participants to maintain anonymity.

### Team Meetings:

In team meetings, all participants can set their own audio and video inputs. We cannot definitively exclude or prevent unauthorized processing by other participants, e.g. by recording the meeting.

## **Transcription**

We use AI applications that analyse the content of the meeting/webinar using artificial intelligence and create an automatic transcription and summary. Your name, your presence and all comments made during the meeting are also processed. The data will also be transmitted to Microsoft.

If we record a webinar or video conference, this is done with your prior consent in accordance with Art. 6 para. 1 a) GDPR. You can revoke this consent at any time with effect for the future.

## **Voice suppression / voice recognition**

Voice registration is a feature in Microsoft Teams that allows users to create a voice profile. Voice recognition is used to improve the audio quality and user experience of Teams meetings and calls. This feature helps to reduce background noise and secondary speakers. The voice profile is used to suppress background noise in Teams meetings through voice isolation. This functionality is deactivated by default for every user. If a user wants to use this functionality, an active action by the user is required. The user is asked to read out a standardised text, which is used to configure the voice profile. The user can delete their voice profile at any time.

The legal basis for the processing is your prior consent in accordance with Art. 6 para. 1 lit. f GDPR.

The use of facial recognition is not permitted.

Data processing with Office 365 is carried out on our behalf on servers in data centres in the European Union in Ireland and the Netherlands.

We have implemented the "Customer Lockbox" functionality in Office 365. This means that Microsoft's support staff have no access to our data in Office 365.

## **Third-country transmission**

Microsoft may request remote access in order to carry out maintenance. We will check these requests on a case-by-case basis and grant access if this is necessary in order for Microsoft to provide support (e.g. for troubleshooting purposes). In this case, access may also be granted to companies that are affiliated with Microsoft and based outside the European Union. We have concluded standard contractual clauses with Microsoft exclusively pertaining to access from outside the European Union in individual instances that we have approved. A copy of Microsoft's standard contractual clauses can be found in the Microsoft Online Services Terms. You can access the latest version in your language via the following link:

<https://www.microsoftvolumelicensing.com/DocumentSearch.aspx?Mode=3&DocumentTypeId=31>.

## **Data processing by Microsoft**

In accordance with its privacy statement, Microsoft reserves the right to process customer data for its own legitimate business purposes. We have no influence over this data processing by Microsoft. To the extent that Microsoft Teams processes personal data in conjunction with legitimate business purposes, Microsoft is the independent data controller for these data processing activities and, as such, is responsible for compliance with all applicable data protection regulations. For information about processing by Microsoft, please refer to Microsoft's privacy statement:

<https://privacy.microsoft.com/de-de/privacystatement>.

## **4. Purpose and legal basis**

### **a) Team meetings:**

In the case of team meetings, we carry out the data processing under points 2 and 3 on the basis of a legitimate interest in accordance to Art. 6 (1) f) GDPR. The purpose and legitimate interest of this data processing is: The provision of communication options with our customers, business partners and interested parties via the Internet as well as for internal coordination.

## **b) Live events:**

We carry out the data processing under points 2 and 3 in the event of the implementation of a live event on the basis of a legitimate interest in accordance to Art. 6 (1) f) GDPR. The purpose and legitimate interest of this data processing is: the implementation of live events organised by us, e.g. webinars on our products and offers, specialist information or further training.

## **5. Data retention duration**

Erasure takes place within the regular archiving process. However, this does not apply when using Teams in the context of active projects. In this case, data is not erased until the statutory period of limitation ends. For claims for defects relating to construction projects, the relevant data is not erased until 5 years after acceptance.

Insofar as statutory retention requirements need to be complied with in this context, the retention period for certain data can be up to 10 years, regardless of the purposes for which the data is being processed.

## **6. Your rights in accordance with the GDPR**

### **a) Information and access**

You can request information about/access to all personal data we are holding for you, free of charge and at any time.

### **b) Rectification, erasure, restriction of processing (blocking), objection**

If you no longer agree to your personal data being stored or if your personal data is no longer correct, on receipt of a corresponding instruction from you, we will have your data erased or blocked or make the necessary corrections (insofar as this is possible under applicable law). The same applies if we are to restrict the processing of your data in the future. In particular, you have the right to object in cases where your data is necessary for the performance of a task in the public interest or our legitimate interest, including any profiling that is based on this. You also have the right to object in cases where data is processed for direct marketing purposes.

### **c) Data portability**

If data is being processed on the basis of a contract or negotiations prior to entering into a contract, on the basis of consent, or using automated methods, you have the right to data portability. On request we will provide your data to you in a commonly used, structured, and machine-readable format so that you can transfer this data to another controller should you wish to do so.

### **d) Your right to withdraw consent with effect for the future**

You can withdraw consent with effect for the future at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

### **e) Right to lodge a complaint**

You also have the option to lodge a complaint with a supervisory authority in relation to your rights as a data subject:

### **f) Restrictions**

The above rights do not apply to data where we are not able to identify the data subject (if the data has been anonymised for analysis purposes, for example). It may be possible for you to exercise your right to access/be informed, right to erasure, right to block, right to rectification, or transfer to another organisation in relation to this data if you provide us with additional information that will enable us to identify you.

If you have any questions, please contact [datenschutzbeauftragter@sto.com](mailto:datenschutzbeauftragter@sto.com).