

DATA PROTECTION NOTICE ON THE USE OF MICROSOFT TEAMS

Last updated: 29 September 2025

Eurofound, who acts as the data controller, embraces the need to protect your personal data. We, therefore, undertake to process it, as data controller, with respect to the applicable law¹.

If after reading this notice you still have questions on the processing of your data, please contact us at dataprotectionofficer@eurofound.europa.eu. We will reply to you within one month.

Who is the data processor?

The data processor is Microsoft Ireland Operations Limited², which can be contacted at Data Protection Officer, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland. Telephone: +353 1 706 3117.

Who are the data subjects?

Data subjects of this processing operation include:

- Eurofound's staff members,
- Staff members of other EU Institutions, Bodies and Agencies, and
- Any natural person whose personal data is being processed using Microsoft Teams.

Why do we process your personal data?

Eurofound processes your personal data for the following purposes:

- organising meetings (internal and/or external);
- organising conversation chats;

¹ [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data](#) (or, the EUDPR).

² Microsoft Ireland, an affiliate of Microsoft Corporation, acts as Eurofound's data processor. Appropriate agreements have been concluded to regulate this relationship.

- recording meetings for the purpose of drafting minutes; and
- recording meetings for communication purposes, including publication on the organisation's intranet Just Connect and/or the organisation's website or official social media accounts³.

Ultimately, Microsoft processes the personal data in Microsoft Teams to deliver the agreed-upon services⁴.

Please note that none of these purposes carried out by Eurofound involves the need to make a decision solely by automated means and without any human intervention.

Which personal data do we collect and process?

The following personal data are processed:

- Content: your meetings and conversations chats, voicemail, shared files, recordings and transcriptions;
- Profile data: data that is shared within Eurofound about you (e.g. e-mail address, profile picture);
- Image and/or video: should the meeting be recorded;
- Call history: a detailed history of the phone calls you make, which allows you to go back and review your own call records;
- Call quality data: details of meetings and call data are available to Eurofound system administrators. This allows Eurofound's administrators to diagnose issues related to poor call quality and service usage;
- Support/Feedback data: information related to troubleshooting tickets or feedback submission to Microsoft; and
- Diagnostic and service data: diagnostic data related to service usage. This personal data allows Microsoft to deliver the service (troubleshoot, secure and

³ Eurofound uses social media (i.e. Twitter, Facebook, LinkedIn, YouTube, Flickr) for promotional purposes. The use of social media does not in any way imply endorsement of them or their privacy policies. In the event that one or more social media are occasionally unavailable we accept no responsibility for lack of service due to their downtime. We recommend that you read each social media privacy policies. These explains each company's policy of data collection and processing, their use of data, users' rights and the ways in which users can protect their privacy when using these services.

⁴ The services provided by Microsoft consist of (i) delivering functional capabilities as licensed, configured, and used by Eurofound and its users, including providing personalised user experiences and processing data as necessary to fulfil contractual obligations to Eurofound or to otherwise comply with law; (ii) troubleshooting (preventing, detecting, and repairing problems affecting the operation of online services); and (iii) ongoing improvement (installing the latest updates and capabilities, and making improvement to user productivity, reliability, efficacy, and security).

update the product and monitor performance) as well as perform some internal business operations, such as:

- o Determine revenue;

- Develop metrics;
- Determine service usage; and
- Conduct product and capacity planning.

Please note neither Eurofound, nor Microsoft can control what you share during meetings and conversation chats. **Eurofound highly advises that you refrain from using Microsoft Teams to disseminate sensitive data** – data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data (mental & physical), and data concerning a natural person's sex life or sexual orientation – **which either concern yourself or another natural person.**

What is the legal basis for processing your personal data?

The processing of your personal data is necessary for the performance of tasks that Eurofound, as an EU Agency, carries out in the public interest⁵. This includes recordings for the purpose of drafting minutes, any processing for archiving purposes in the public interest⁶, as well as web streaming of some recordings under specific situations⁷.

Any further processing of personal data will only take place upon your consent⁸.

Who has access to your personal data and to whom is it disclosed?

Access to your personal data will be given to the following categories of recipients:

- Natural persons attending the meetings and/or conversation chats;

⁵ Article 5(1) (a) of the EUDPR.

⁶ Documents of historical or administrative value, as defined under the Council Regulation (EC, Euratom) No 1700/2003 of 22 September 2003 amending Regulation (EEC, Euratom) No 354/83 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community (OJ L 243, 27.9.2003, p. 1–4) and Eurofound's Internal Rules for the application of Council Regulation 354/1983 as amended by Council Regulation 1700/2003 and Council Regulation (EU) 2015/496 of 17 March 2015.

⁷ The recording of the following meetings may be published on Microsoft Streams and linked to JustConnect: (i) General Staff Meetings, (ii) Presentations by high-profile visitors, (iii) Internal (research) seminars, and (iv) Meetings of committees that deal with subjects of public interest (e.. Covid-19 response committees). The publication of such meetings aims to allow (absent) staff members to follow the meeting(s) subsequently and gain knowledge of what was discussed there.

⁸ Article 5(1) (d) of the EUDPR.

- Natural persons being mentioned during the meetings and/or conversation chats;
- Natural persons being mentioned in files shared during the meetings or on conversation chats;
- Eurofound's administrators; and
- Eurofound's processors, including Microsoft and Microsoft's processors.

No other third parties will have access to your personal data, except if required by law.

How long do we keep your personal data?

Please note that Eurofound cannot control the use and storage of any data you may share with other natural persons using Microsoft Teams. As such, Eurofound cannot inform you how long these data will be kept by such recipients.

By default, Eurofound does not keep any additional specific data other than that kept by Microsoft related to Teams use as part of a Microsoft 365 tenant⁹.

Without prejudice to the above, the following retention periods apply:

- a) Staff member's personal data (username, e-mail address, if applicable IP address and profile photo, as well as customer data not falling under any retention period below) will remain in the database until your Eurofound account has been deactivated, after which they will be deleted from Microsoft's servers after a 90-day retention period. Deactivation occurs after departure from the Agency;
- b) If no recording is done, audio and video calls in Microsoft Teams are processed only 'real time';
- c) In cases where a recording is made for the purposes of drafting minutes, it will be securely destroyed as soon as the minutes are approved;
- d) Any recording which may be published on Microsoft Streams and/or linked to JustConnect will be kept for a period of 20 calendar days, after which it will be securely destroyed;
- e) All recordings considered to have archiving value will be kept for 30 years, after which they will become of public domain¹⁰; and

⁹ The data retention aspects of the Teams tenant are described [here](#).

¹⁰ Eurofound will comply with provisions set forth in the EDPR, in particular Article 13. As such, Eurofound will assess the feasibility to fulfil the archiving purposes by processing data which do not permit or no longer

- f) Individual ad-hoc chats can be deleted by the message author and on a message-by-message basis. They will also be automatically deleted after 3 months.

As for Microsoft, it commits itself to retain your data for the minimum amount of time necessary to deliver the service. *'Because this data is required to provide the service, this typically means that we retain personal data until the user stops using Microsoft Teams, or until the user deletes personal data. If a user (or an administrator on the user's behalf) deletes the data, Microsoft will ensure that all copies of the personal data are deleted within 30 days.'*¹¹

How do we protect and safeguard your data?

Microsoft has implemented appropriate security measures to ensure the protection of your personal data, including, but not limiting to:

- All data in transit over public networks between Eurofound and Microsoft, or between Microsoft data centres, is encrypted by default using strong encryption;
- Microsoft maintains Access Control mechanisms;
- Microsoft has appointed one or more security officers responsible for coordinating and monitoring the security rules and procedures;
- Microsoft performed a risk assessment before processing data on behalf of Eurofound;
- Microsoft maintains records of the incoming and outgoing media containing data processed on behalf of Eurofound, including the kind of media, the authorised sender/recipients, date and time, the number of media and the types of data they contain; and
- Microsoft is certified in the following ISO standards:
 - ISO 9001:2015 Quality Management Systems Standards;
 - ISO 22301:2012 Business Continuity Management Standard;
 - ISO/IEC 27001:2013 Information Security Management Standards;

permit the identification of data subjects (such as, for instance, analysing the possibility of pseudonymisation of the data).

¹¹ According to information provided by Microsoft on its 'Privacy and Microsoft Teams' available at <https://docs.microsoft.com/en-gb/microsoftteams/teams-privacy>.

- ISO/IEC 27017:2015 Code of Practice for Information Security Controls;
- ISO/IEC 27018 Code of Practice for Protecting Personal Data in the Cloud; and
- ISO/IEC 27701 Privacy Information Management System (PIMS).

Eurofound has a documented Electronic Information Security Policy¹², which defines the generic ICT infrastructure security measures that are in place. Eurofound permits guest users and has disabled all third-party apps. We also have a contract with external consultants to understand, configure and document all governance and security decisions related to Microsoft365 implementation, including the use of Teams.

Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

Pursuant to the Inter-institutional Licensing Agreement signed between the EU institutions and agencies and Microsoft:

- Customer Data and Personal Data is stored and processed in data centres in the EU and EFTA¹³;
- Stored service generated logs from the Microsoft 365 In-Scope Services takes place in the EU, Norway, and the following adequate countries: Canada, Israel, Japan, New Zealand, Switzerland, United Kingdom, United States, and Uruguay;
- Access to the limited Customer Data and pseudonymised personal data for security operations may take place in the EU, Norway, adequate countries (Canada; Israel; Japan; New Zealand; Switzerland; United Kingdom; United States; Uruguay), Australia, India, and the United Arab Emirates;
- Microsoft Online Services are highly automated and designed to operate without human intervention. Accordingly, if an Online Service is down or broken, the first level of repair is fully automated. In exceptional cases where automation is unable to remediate an issue and Microsoft human engineers need access to the production infrastructure. Processing may take place in EU, adequate countries (Canada; Israel; Japan; New Zealand; Switzerland; United Kingdom; United States; Uruguay), Australia, Brazil, Chile, Colombia, Costa Rica, Egypt, El

¹² GR-19-1041.

¹³ Iceland, Liechtenstein, Norway, and Switzerland.

Salvador, Georgia, India, Jordan, Kenya, Malaysia, Mexico, Peru, Philippines, Serbia, Singapore, South Africa, Taiwan, and Vietnam; and

- Microsoft personnel and approved staff augmentation vendors who support internal platform services upon which M365 is dependent may process data in the EU, adequate countries (Canada; Israel; Japan; New Zealand; Switzerland; United Kingdom; United States; Uruguay), Australia, Brazil, Costa Rica, Egypt, India, Jordan, Malaysia, Serbia, Taiwan, Türkiye, and United Arab Emirates.

Please note that Microsoft does not control or limit the regions from which the customer or its end users may access or move customer data. Therefore, in case an Eurofound's staff member travels outside the EU/EEA and uses the services, personal data may be processed.

What are your rights as a data subject and how can you exercise them?

Within the limits set by the EUDPR, you have the right to access, rectify, erase and/or port your personal data, to restrict or object to the processing of your personal data, and to withdraw your consent (if obtained). Just note that withdrawal of your consent does not affect the lawfulness of processing while your consent was valid.

You may contact the ICT sector (ICT@eurofound.europa.eu) with your request. Your request is free of charge. However, if it is manifestly unfounded or excessive, Eurofound may refuse to act on it.

You also have the right to raise a complaint with the European Data Protection Supervisor should you consider that this processing is in violation of the law. You will find more information [here](#).