



M&G plc uses Microsoft Teams technology to facilitate audio and video communications. Where recording is undertaken this is to support business processing and/or regulatory requirements.

M&G plc is formed from a group of companies, membership of that group can be found **here**.

This privacy notice is applicable to communications recorded via the Microsoft Teams platform. Specific information on personal data processing is available to customers, clients and employees in the privacy notice applicable to your relationship, product or service with M&G plc.

# **Contact us**

If you have questions regarding this privacy notice please contact the Data Protection Officer:

### By email: Privacy.Team@mandg.com

# Confidentiality

M&G plc takes privacy obligations seriously and complies with applicable data protection laws and regulations.

Access to any personal data captured in recordings is subject to control. We have policies and procedures in place that limit the access and use of such information.

Recording will either be organiser invoked for business support or centrally applied for roles requiring regulatory monitoring.

Access is limited by permissions controlled by meeting organisers in the case of business support and restricted to authorised functions conducting compliance verification for regulatory purposes.

# **Personal data**

The categories of personal data held in relation to recordings are relating to participant identity, including contact information, image (in the case of video) and their personal contributions to the business process/meeting.

# Use of personal data

M&G plc may record meetings for the following purposes:

- To have a record and potentially transcribe meeting content including meeting participants' and meeting contributions
- · To establish participant identities
- To record business meetings to support dissemination of information, training activity and to create records of discussions, decisions and progress
- To support regulatory compliance processing

# Lawful basis of processing

M&G plc must have a lawful basis to process personal data, here we rely on:

### **Business Support:**

- consent provided by participants
- processing necessary for the performance of a contract to which the data subject is a party

### **Regulatory Compliance:**

• processing is necessary for compliance with a legal obligation to which the controller is subject

## Retention

Where recordings are made they are retained:

### **Business Support:**

• For as long as needed in line with M&G plc's data retention policies.

### **Regulatory Compliance:**

• For the required legal/regulatory retention ie MiFID II recordings are held for seven years.

# Special category personal data

In the normal course of business M&G plc will not be using recorded meetings to gather or discuss special category personal data. However, where a meeting is organised that covers such topics, this data will only be gathered and used with the explicit consent of data subject.

Any special category personal data will only be processed where it is essential for the delivery of any agreed service or business process. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

## Data transfers and sharing

Data may be shared but only where is necessary for the provision of a service you have agreed to, or where otherwise required to by law.

Recordings involve third party processing of your data by Microsoft. Details in respect of Microsoft Teams privacy and security are available at the Microsoft Trust Centre **here**.

# Your rights

You have rights to:

- access your personal data and request a copy
- · require us to correct your personal data
- · restrict processing of your personal data
- request deletion of your personal data (in limited circumstances)
- object to our processing of your personal data
- request transfer of your personal data to you or another organisation where possible.

For more information or to exercise your rights please contact: **privacy.team@mandg.com** 

## Making a data protection complaint

If you have any concerns about the use of your personal data, or the way we handle your requests relating to your rights, you can raise a complaint directly with us using the contact details above.

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the details available on their website: **www.ico.org.uk** 

For alternate EU Data Protection Authority contacts please see further information on the following link **National Data Protection Authorities**.