

# NDM AI Meeting Tools Privacy Notice

## **Overview**

The University of Oxford is committed to protecting the privacy and security of your personal information ('personal data'). This policy describes how we collect and use your personal data during the use of generative AI tools (AI tools) for meeting support in accordance with the UK General Data Protection Regulation (UK GDPR) and associated data protection legislation.

## Who is using your personal data?

The University of Oxford<sup>1</sup> is the "data controller" for personal data processed via AI tools used during NDM-hosted meetings. This means that we decide how to use it and are responsible for looking after it in accordance with the UK GDPR.

Access to your personal data within the University will be provided to those staff who need to view it as part of their work in connection with meeting organisation or engagement. It will also be shared with the third parties described below.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We may update this policy at any time.

## Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure or retention.

<sup>&</sup>lt;sup>1</sup> The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

## Types of data we collect about you

We will collect, store, and use the following categories of data captured during the meeting:

#### Data we may collect about you.

- Name
- Job title
- Organisation
- Email address
- Video and audio recordings
- Chat messages and any other information shared during the recording

#### When we collect your data

We will collect data about you during meetings where an AI tool is used, or where a transcript of the meeting is captured and subsequently uploaded to an AI tool.

#### How we use your data

We process your data for the following reasons:

- **Personal Note-Taking** Generating summaries and translations to support individuals staff members' understanding of and engagement with meetings.
- Informal Meeting Management Generating informal meeting summaries and identifying agreed actions to support effective meeting management.
- Formal Minute-Generation Generating meeting summaries and identifying agreed actions to support the creation of formal meeting minutes.

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason, and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

#### Sharing your data with third parties

We may share your data with third parties who provide services on our behalf, such as for hosting and providing access to relevant third-party stakeholders (e.g., external meeting attendees). All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

We may also share your data with third-party partners so they can provide hosting facilities accessible to third-party organisation personnel who have a need to access the AI tool outputs.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

### Where we store or use your data

Data may be stored on University-managed platforms, or on third-party systems approved by the University, including:

- Nexus365 (Copilot, SharePoint, OneDrive etc.)
- ChatGPT (Edu Licenced version)

There may be occasions when we transfer your data outside the United Kingdom, for example, when we use a cloud-based service provider that operates outside the UK. Such transfers will only take place if one of the following applies:

- The country receiving the data is considered by the UK to provide an adequate level of data protection.
- The organisation receiving the data is covered by an arrangement recognised by the UK as providing an adequate standard of data protection.
- The transfer is governed by approved contractual clauses.
- The transfer has your consent.
- The transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract.
- The transfer is necessary for the performance of a contract with another person, which is in your interests.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted during the recording and any transmission is at your own risk.

## **Retaining your data**

We will only retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements.

## Your rights

Under certain circumstances, by law you have the right to:

- Request access to your data (commonly known as a "subject access request").
  This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction of your data**. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your data. This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing of your data** and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing of your data**. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, you should contact the Nuffield Department of Medicine's Information Governance Team at information.governance@ndm.ox.ac.uk, or alternately data.protection@admin.ox.ac.uk for the University's Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the UK GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office at https://ico.org.uk/concerns/.

## **Changes to this policy**

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## Contact

If you wish to raise any queries or concerns about this privacy policy please contact us at <u>information.governance@ndm.ox.ac.uk</u>.

