

Nemak Privacy Notice for Microsoft Teams Recordings, Transcriptions and AI Meeting Features

1. Introduction

Nemak S.A.B. de C.V., together with its subsidiaries and affiliated companies worldwide ("Nemak"), is committed to protecting personal data and ensuring transparency regarding the processing of personal information in business communications.

This Privacy Notice applies to Microsoft Teams meetings hosted by Nemak where meeting recording, transcription, AI-generated meeting summaries, Microsoft Copilot features, or other Microsoft Teams related collaboration features are enabled.

By participating in a Nemak-hosted Microsoft Teams meeting, you acknowledge that personal data may be processed as described in this Privacy Notice.

2. Responsible for Processing

The relevant Nemak entity organizing the meeting or otherwise determining the purposes and means of the processing related to the meeting, acts as the controller responsible for the processing of personal data in connection with the meeting. As Nemak operates globally through affiliated companies, the identity of the controller may vary depending on the meeting, business activity and organizing entity.

Where multiple Nemak entities participate in a meeting, personal data may be shared among affiliated Nemak companies on a need-to-know basis and for legitimate business purposes in accordance with applicable data protection laws.

3. Purpose of Processing

Nemak may process meeting-related personal data for the following business purposes:

- business communication and collaboration,
- documenting meetings and business decisions,
- project management and coordination,
- training and educational purposes,
- information security and business continuity purposes, and
- quality, compliance and audit requirements.

Meeting recordings, transcripts and AI-generated outputs shall not be used for routine employee performance monitoring, behavioral profiling or employee surveillance activities.

4. Categories of Personal Data Processed within Teams-Meetings

Depending on the nature of the meeting and a participant's level of interaction, Nemak may process the following categories of personal data:

- **Name and business contact information**
Such as your name, business email address, job title, department, company affiliation and other professional contact details used to identify participants and facilitate collaboration.

- **Username and profile information**
Including your Microsoft Teams username, profile picture, presence status and other profile information made available through Microsoft 365 services.
- **Video and voice recordings**
Audio and video content captured during recorded meetings, including verbal contributions, discussions, presentations and visual participation where cameras are enabled.
- **Screen sharing content**
Information displayed while sharing a screen, application window, document, presentation or other digital content during a meeting.
- **Presentations and documents shared during meetings**
Files, presentations, spreadsheets, reports, images and other materials made available by participants through Microsoft Teams or related Microsoft 365 services.
- **Chat messages and reactions**
Messages exchanged during meetings, including comments, links, attachments and other reactions by participants.
- **Attendance and participation information**
Information relating to meeting participation, including join and leave times, duration of attendance, participant lists and participation status.
- **Meeting transcripts**
Text-based transcripts automatically generated from spoken content during meetings, including statements made by participants and speaker attribution where supported by the technology.
- **AI-generated meeting summaries, notes, recaps and action items**
Content automatically generated through Microsoft Teams, Microsoft Copilot or other AI-assisted features, which may include meeting summaries, key discussion points, decisions, assigned tasks, follow-up actions and suggested next steps.

Participants should avoid disclosing personal information that is not necessary for the purpose of the meeting. Participants should refrain from sharing special categories of personal data, such as information relating to health, religious beliefs, political opinions, trade union membership, biometric data, genetic data or other sensitive personal information, unless such disclosure is necessary for a legitimate business purpose and permitted under applicable law.

5. Notification for Recording, Transcription and AI Features

When meeting recording, transcription, Copilot, AI-generated summaries and other meeting features are enabled, Microsoft Teams will provide a notification to meeting participants.

Such notifications are intended to ensure transparency regarding the processing of personal data and to inform participants that their audio, video, shared content, chat contributions and other interactions within the meeting may be included in recordings, transcripts or AI-generated meeting outputs.

Depending on the configuration established by Nemak, participants may be required to actively acknowledge the notification or, where required by applicable law, provide their consent before enabling their microphone, camera or content sharing functionality during a recorded or transcribed meeting. Where explicit consent functionality is enabled, participants may be asked to confirm their willingness to be included in the recording, transcription or related meeting outputs before actively contributing to the meeting.

Participants are encouraged to carefully review all notifications, warnings and privacy information displayed by Microsoft Teams before they contribute personal data during a meeting.

By choosing to actively participate in a recorded or transcribed meeting, participants acknowledge that information they voluntarily provide during the meeting may be captured, processed, stored and made available to authorized persons in accordance with this Privacy Notice and applicable law.

Where technically supported by Microsoft Teams and applicable under local law, participants who do not wish to be included in a recording or transcription may have access to alternative participation options. Participants who have concerns regarding the recording, transcription or use of AI-assisted meeting features should contact the meeting organizer before or during the meeting to discuss available alternatives.

The activation of a camera during a recorded meeting is voluntary unless participation with video is required for a specific legitimate business purpose. Where a participant activates their camera or microphone during a recorded or transcribed meeting, the corresponding audio and video information may become part of the recording and will be processed in accordance with this Privacy Notice.

This section provides notice regarding the processing of personal data but does not limit any rights available to participants under applicable data protection, employment or privacy laws.

6. Legal Basis for Processing

Personal data is processed in accordance with applicable privacy and data protection laws.

Depending on the specific circumstances of the meeting, Nematik may rely on one or more of the following legal bases:

- legitimate business interests, including collaboration, documentation, knowledge management, training, compliance and operational purposes,
- performance of a contract or pre-contractual relationship,
- compliance with legal obligations,
- employment-related purposes,
- protection of legitimate business operations, and
- consent, where required by applicable law or where implemented through technical controls provided by Microsoft Teams.

Where consent is used as a legal basis, participants may withdraw their consent at any time. Such withdrawal shall not affect the lawfulness of processing carried out before the withdrawal.

7. Access and Disclosure of Information

Access to meeting recordings, transcripts, AI-generated summaries and other related meeting content is restricted to individuals who have a legitimate business need to access such information for the purposes for which the content was created.

Access is granted on a need-to-know basis and is limited to authorized individuals whose responsibilities require access to the information. Nematik applies appropriate technical and organizational measures to ensure that meeting content is only accessible to authorized users and is protected against unauthorized access, disclosure, alteration or misuse.

Depending on the purpose of the meeting and the business need, access may be granted to:

- the meeting organizer and any specifically authorized delegates responsible for managing the meeting,
- participants who attended the meeting and require access to the recording, transcript or meeting outputs for business purposes,

- authorized Nemak employees involved in the relevant business process, project, function or activity,
- regulatory or governmental authorities where required by law, and
- external legal advisors, auditors, consultants, service providers and other business partners who have a legitimate business need to access the information and who are subject to appropriate confidentiality, contractual and data protection obligations.

Individuals with access to meeting content must maintain its confidentiality and may only use such information for the purposes for which it was collected. Unauthorized recording, copying, downloading, sharing, disclosure or distribution of meeting content is prohibited and may result in corrective or disciplinary action in accordance with applicable policies and laws.

Access rights are granted in accordance with the principle of least privilege and may be modified, restricted or revoked whenever no longer required for legitimate business purposes.

8. International Data Transfers

As a global organization, Nemak operates through affiliated companies in multiple countries. Personal data may therefore be accessed by authorized Nemak personnel and trusted service providers where necessary for legitimate business purposes, such as collaboration, operational support, compliance, security and business continuity. Nemak applies the “Need-to-Know” Principle. Access to personal data is restricted to authorized individuals who require such access to perform their professional duties and legitimate business functions.

Because Nemak operates globally, personal data may be transferred to and accessed from countries outside the participant’s country of residence where necessary for legitimate business purposes, collaboration, operational support, compliance, cybersecurity and business continuity purposes. Where such transfers occur, Nemak implements appropriate safeguards in accordance with applicable data protection laws, including contractual, technical and organizational measures designed to protect personal data.

For further information regarding international data transfers, please contact the Nemak Data Protection Office.

9. Data Security

Nemak maintains appropriate technical and organizational measures designed to protect personal data against accidental, unauthorized or unlawful destruction, loss, misuse, alteration, disclosure or access.

Access to recordings, transcripts and AI-generated outputs is managed through role-based permissions and access management processes. Access is granted only to authorized individuals with a legitimate business need and is regularly reviewed to ensure that permission remains appropriate and limited to the minimum extent necessary for the performance of assigned responsibilities.

10. Data Retention

Unless a longer retention period is required for legal, regulatory, audit, compliance, investigation, litigation hold or other legitimate operational or business purposes, meeting recordings, transcripts, AI generated recaps, notes and summaries will be retained for 90 days and thereafter automatically deleted.

Meeting organizers and system administrators are responsible for ensuring compliance with applicable retention and deletion requirements.

11. Microsoft as Service Provider

Microsoft provides the Teams platform and related Microsoft 365 services on behalf of Nemak. Additional information regarding Microsoft's processing of personal data can be found in Microsoft's Privacy Statement:

<https://www.microsoft.com/privacy>

12. Data Subject Rights

Subject to applicable law, individuals may have the right to:

- obtain access to their personal data,
- request correction of inaccurate personal data,
- request deletion of personal data,
- request restriction of processing,
- object to processing based on legitimate interests,
- request data portability,
- submit a complaint to the relevant supervisory authority.

Requests relating to privacy rights may be submitted using the contact information below.

The exercise of privacy rights may be subject to limitations or exceptions under applicable law, including where continued retention or processing is necessary for legal claims, regulatory requirements, compliance obligations, security purposes or legitimate business interests.

13. Contact

For questions regarding this Privacy Notice or the processing of personal data in connection with Microsoft Teams meetings, please contact:

For people located within the European Economic Area, Switzerland, United Kingdom, India or Turkey:

EU Data Protection Officer
Nemak Europe

Email: dataprivacy@nemak.com

For people located any other region:

Governance & Compliance Department

Email: governance@nemak.com

Because Nemak operates through multiple affiliated companies worldwide, individuals may also contact the Nemak entity organizing the relevant meeting regarding privacy-related questions or requests.

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