AI-Assisted Meeting Recordings, Transcriptions and Notetaking Privacy Notice

Version 1: October 2026

1. An overview of data protection

The Luxembourg Institute of Science and Technology (hereafter "**LIST**", "**We**") is committed to ensure the highest standards of data protection in compliance with the applicable legislation, notably with reference to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereafter "**GDPR**").

The present document aims at illustrating what personal data we collect about you, the reason why LIST uses your data and, as the case may be, share your data and the applicable retention periods. Additionally, the notice also provides you with information regarding your rights, how to exercise them and whom you can contact in case of any query.

2. Scope of this Notice

This Privacy Notice applies to the Artificial Intelligence (AI)-assisted recording, transcription, and processing of:

- Internal LIST online and hybrid meetings and webinars via Microsoft Teams
- External online and hybrid meetings organised by LIST via Microsoft Teams with business partners, suppliers, clients and any other external person participating in such a meeting
- Public webinars and events organised by LIST via Microsoft Teams
- Any other meeting or communication activity of LIST via Microsoft Teams where AI-assisted recording, transcription, or notetaking occurs

This Notice complements and should be read in conjunction with:

- **LIST** Staff Privacy Notice (for LIST employees)
- **LIST** Business Partners, Suppliers and Clients Privacy Notice (for external participants)
- **LIST** Events Privacy Notice (for recordings done in the framework of LIST's public events)
- **LIST** Social Media Privacy Notice (if recordings are published on LIST's website and other social media channels)

Where those notices conflict with this Notice, the more specific or restrictive provision shall apply.

This Notice is addressed to all LIST employees and any external person participating in a meeting organised by LIST in which AI tools are used to record, transcribe and process the meeting content (hereafter "**You**").

3. Identity of the data controller

The data controller is LIST, having its registered office at 5, Avenue des Hauts-Fourneaux L-4362 Esch-sur-Alzette, Luxembourg. LIST is in this case the sole responsible for collecting and processing your personal data in relation with your participation to LIST's activities.

4. Why and how your personal data is processed

LIST collects and uses meeting participants' personal data for the following purposes:

Purpose	Details
Recording and transcription of meetings	LIST may need to record meetings (audio/video) held via Microsoft Teams to create accurate records of substantive discussions and decisions for internal documentation, compliance, and audit purposes. AI tools, such as Microsoft Copilot and Fireflies.ai, may be used in this regard. Personal data collected may include participant identification, audio/video data, verbal contributions, chat messages, and metadata.
Generate meeting minutes and recaps (summaries, decisions, action items) during internal and external online meetings, workshops and events	LIST may use AI tools (Microsoft Copilot and Fireflies.ai) to generate summaries, extract action items, identify key discussion points, and enhance accessibility. For this reason, audio or video recordings of a meeting may take place depending on the technical functionalities of each tool. Personal data collected may include participant identification, audio/video data, verbal contributions, chat messages, and metadata. AI-generated outputs are reviewed by LIST staff before distribution. This processing improves organizational efficiency and record-keeping. AI tools are not used to make binding decisions about individuals (please refer to section 12 of this Notice). LIST accepts no liability or responsibility for recordings and automated transcriptions made by these AI tools.
Publication of recordings or summaries on LIST's social media channels, website or Intranet	Recordings, quotes, images, or summaries may be published on LIST's website, Intranet or social media channels (LinkedIn, YouTube, Facebook, Twitter, etc.) for communication and awareness-raising purposes. Explicit separate consent is required from all identifiable participants before any recording, image, quote, or summary is published. LIST's Social Media Privacy Notice applies to published content.
To ensure security	LIST may process your technical data for the purpose of ensuring the integrity, confidentiality, and availability of LIST's information systems, detecting and responding to unauthorised access attempts or anomalous usage patterns, verifying that the tool is operated within the

	boundaries of its approved configuration and access permissions, and providing an auditable record of system interactions in the event of a security incident or data breach investigation.
Archiving	LIST may retain meeting recordings, minutes, and summaries in its institutional archives for as documentary evidence of LIST's activities, decisions, and collaborations in accordance with the Luxembourgish Law on public archives. Archived materials may be used for scientific research, historical analysis, or public interest purposes, subject to applicable retention periods and access restrictions. Personally identifiable information may be redacted or anonymized where feasible for archival purposes. Archival is conducted in accordance with the LIST's archival obligations as a research and technology organization.

5. How Meetings Are Recorded and Processed

You will be notified before recording begins through a clear announcement or other visual indicator on the meeting platform. If you do not wish to be recorded, you may:

- Turn off your camera and/or microphone during the recording
- Refrain from typing comments in the chat

LIST may use the following AI tools to assist with transcription, summarisation, and analysis of meeting content:

- **Microsoft Copilot (integrated with Teams):** For generating meeting minutes, action items, and key discussion points from meeting recordings and transcripts stored in LIST's OneDrive environment, In this case meetings are recorded using Microsoft Teams Recording Function: Built-in recording and transcription functionality within Microsoft Teams
- **Fireflies.ai:** A third-party AI transcription and summarisation tool that may be used to generate automated transcripts and meeting minutes. **Fireflies joins the meeting as a participant under the name "Fireflies.ai Notetaker"** and will appear in the participants list during the live meeting.

For more information about how these tools are used, please see **section 12** below of this Notice.

6. Categories of personal data we process

The categories of personal data that we collect about you may vary depending on the type of the recorded meeting or event. Those include:

Data category	*Details*
Identification Data	Name, job title, organization/affiliation, email address, phone number, the image associated to your Microsoft teams user profile
Voice and Image	Voice recording, video footage (if camera is enabled), appearance, and any visible identifying features, audio
Participant contributions	Verbal statements, questions, comments, opinions, ideas, and suggestions expressed during the meeting orally or though the chat
Chat and written communications	Text messages, questions, and comments posted in the meeting chat function
Shared documents and presentations	Slides, materials, and documents presented or referenced during the meeting, if recorded
Technical data	Metadata, service usage and security logs (e.g., access logs, authentication events, device/IP-related logs), potential indirect location indicators may appear in meeting artefacts (e.g., meeting time zone, meeting room name, IP-derived location in security logs, or location stated verbally).
AI-generated outputs	Summaries, transcriptions, key points, action items, and other analytical content generated by AI tools based on meeting content which may contain personal data
Other data shared by the meeting participants	Depending on the nature of the meeting this may include economic data, financial data, data related to a participant's personal/profession life etc.

Special Categories of Personal Data (Article 9 GDPR):

LIST **does not** intentionally collect or require sensitive personal data (health information, religious beliefs, political opinions, trade union membership, genetic data, biometric data, or criminal records) as part of meeting recordings. **Participants are requested to NOT disclose such information during recorded meetings.** If sensitive data is inadvertently shared, or if special circumstances arise (accessibility needs, medical appointments, etc.), LIST will pause or terminate the recording and may request explicit consent to continue, in accordance with Article 9 of the GDPR.

7. Legal basis for processing

Below you can find the list of legal bases on whose grounds LIST collects and processes your personal data:

Purpose	Legal basis
Recording and transcription of meetings	Article 6(1)(f) GDPR: LIST's legitimate interest in producing a reliable record of decisions and action items taken during meetings, to support internal accountability and continuity of work between participants.
Generate meeting minutes and recaps (summaries, decisions, action items) during internal and external online meetings, workshops and events	Article 6(1)(f) GDPR: LIST's legitimate interest in generating concise, searchable summaries of meeting content to ensure proper documentation of important decisions and continuity of its everyday activities
Publication of recordings or summaries on LIST's social media channels, website or Intranet	Article 6(1)(a) GDPR: Where applicable, separate and explicit consent will be obtained before any recording, summary, quote, or image is published. Please refer to LIST's Social Media Privacy Notice.
To ensure security	Article 6(1)(f) GDPR: LIST's legitimate interest in ensuring a high level of security of its Information Technology systems in accordance with its obligations under article 32 GDPR to implement appropriate technical and organisational measures to ensure security
Archiving	Article 6(1)(c) GDPR: LIST's legal obligation under the Luxembourg Law on Archiving (Loi du 17 août 2018 sur l'archivage)

8. Share of your personal data with third parties

LIST may share your personal data with:

- LIST's internal departments on a strict need-to-know basis: LIST IT team for technical support, platform maintenance, and security purposes; LIST Legal Office, Internal Audit and Communication deparment on a strict need-to-know basis.
- Meeting participants on a need-to-know basis.
- External service providers that perform services on LIST behalf, such as IT service providers: Microsoft, Fireflies.ai, other companies that may provide technical support and maintenance to LIST IT infrastructure.
- External LIST's partners and collaborators: When meetings are jointly organised or conducted with institutional or non-institutional partners, limited to relevant data.

Recording will not be shared with third parties beyond internal meeting documentation, except where:

- Explicit consent has been obtained from affected participants
- Legal or regulatory obligations require disclosure
- The recording is published on LIST's social media or website (in which case LIST's Social Media Privacy Notice applies)

- The public in general: in case the recording or parts of it is published on LIST's dissemination channels.

Some of the mentioned recipients of your personal data may be in countries outside the European Union or the European Economic Area (**EU/EEA**):

Microsoft Ireland Operations Limited: This processor is based in Ireland and is the provider of Microsoft Outlook, an email and calendar application as well as Microsoft Teams, a video-conferencing platform, both of which are available as part of Microsoft's Office 365 suite. LIST has opted for the "EU Data Boundary", meaning that all processing and storage of personal data is within the EU/EEA. Nonetheless, in case Microsoft transfers personal data in the United States of America or any other country in which Microsoft or its contractors maintain facilities, those transfers are governed by Standard Contractual Clauses. For further details, please have a look at the following webpage: https://learn.microsoft.com/en-us/microsoftteams/teams-privacy

Fireflies.ai Corp.: This processor is based in the United States and is the provider of Fireflies.ai, an AI-powered meeting transcription and summarization service. Fireflies.ai may transfer, store and process personal data in the United States of America or any other country in which Fireflies.ai or its contractors maintain facilities. Fireflies.ai stores meeting recordings and transcripts in EU/EEA data centers; however, automated transcription and AI analysis processing may occur in third countries. Transfers out of the European Union (EU) and European Economic Area (EEA) are governed by Standard Contractual Clauses (SCCs). For further details, please refer to the following webpage: https://fireflies.ai/privacy

9. Ensuring personal data security and integrity

In compliance with the applicable data protection legislation, LIST has put in place appropriate technical and organisational measures in order to prevent or act upon any unauthorised and unlawful processing or disclosure, accidental loss, modification or destruction of personal data. These measures are implemented based on the current state of art, an evaluation of the risks derived by the processing activity and the need to protect personal data. Such technical and organisation measures are regularly updated and/or adjusted to new technical developments or any organisational change that may affect LIST.

In particular, access on a need-to-know basis has been implemented to ensure only staff with appropriate need for the purpose has access to the personal data of meeting participants. Additionally, we have data processing agreements in place with our processors.

10. Data retention periods

LIST will only retain your personal for a period of time that is strictly necessary for the purposes for which we collect your data, without prejudice to LIST to keep them for a longer duration for legal and/or regulatory obligations applying to LIST or due to exceptional situations that would

justify them being kept longer (judicial procedure, etc.). Below are the details regarding the time we keep your personal data:

Purpose	Retention Period
Recording and transcription of meetings	Original meeting recordings and transcripts used for internal minutes creation as well as other artefacts automatically generated by the AI tools will be permanently deleted within 123 days after the meeting ends. The meeting data processed in accordance with section 12 will be retained in accordance with LIST's Retention Schedule.
Generate meeting minutes and recaps (summaries, decisions, action items) during internal and external online meetings, workshops and events	
Publication of recordings or summaries on LIST's social media channels, website or Intranet	Retained in accordance with LIST's Retention Schedule and for as long as content remains published.
To ensure security	Retained in accordance with LIST's Retention Schedule
Archiving	

11. Your rights and how to exercise them

With regards to your personal data collected and processed by LIST, you may exercise at any time the following rights:

- **Right to access**: You have the right to receive confirmation about whether or not your personal data is being processed by LIST. If that is the case, you have the right to know what data is being collected and processed and to obtain of copy of it;
- **Right to rectification**: If the personal data we hold about you is inaccurate or incomplete, you have the right to request to have it rectified;
- **Right to erasure**: Subject to certain conditions specified in art. 17 of the GDPR, you have the right to have your personal data deleted by LIST;
- **Right to restriction of processing**: Subject to certain conditions specified in art. 18 of the GDPR, you have the right to obtain restriction of the processing of your personal data performed by LIST;
- **Right to data portability**: Subject to certain conditions specified in art. 20 of the GDPR, you have the right to obtain a copy of the personal data you provided to LIST in in a structured, commonly used and machine-readable format and to request the transfer of these data to another data controller;
- **Right to object**: You have the right to object the processing of your personal data when the conditions set out in art. 21 of the GDPR apply.

- **Right to withdraw consent**: If LIST is processing your personal data based on your consent, you have the right to withdraw that consent at any time. The withdrawal of such consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint with a supervisory authority**: You have the right to lodge a complaint with the Commission Nationale pour la Protection des Données (CNPD). More information on how to lodge a complaint are available on CNPD's website: https://cnpd.public.lu.

You may exercise any of these rights by contacting our Data Protection Officer (DPO) via our online form available at: https://www.list.lu/en/support/dpo-contact-form/

12. AI Transparency and Automated Decision-Making

LIST currently uses the following AI tools for meeting processing:

- **Microsoft Copilot (Teams):** Generates summaries, key points, and action items from meeting transcripts; identifies topics, decisions, and participants
- **Fireflies.ai:** Automated transcription service that converts speech to text; can generate summaries and highlight key moments
- **Other AI Services:** LIST may implement additional AI tools in the future; participants will be notified in advanced of any new tools used and we encourage you to visit this page regularly

AI tools are used to:

- Transcribe audio to text
- Summarize meeting discussions
- Extract action items and decisions
- Identify key topics and themes
- Enhance accessibility through captions or transcripts
- Organize and retrieve meeting information efficiently

AI tools are **not used for**:

- Making binding decisions about participants (e.g., performance evaluation, hiring, disciplinary action)
- Profiling or automated decision-making that produces legal or similarly significant effects
- Collecting behavioural or psychological insights for purposes beyond meeting documentation

LIST acknowledges that AI-generated transcripts, summaries, and analyses may contain errors or inaccuracies:

- Automated transcription may misrecognize speakers, technical jargon, or accent variations
- AI summaries may misinterpret context or omit nuanced discussion points
- Action item extraction may be incomplete or require clarification

Human Review: AI-generated content is reviewed and corrected by LIST staff before being relied upon or distributed. Participants are encouraged to review summaries, identify inaccuracies and request the meeting organiser(s) to correct any errors.

LIST's use of AI for meeting analysis **does not** currently trigger Article 22 protections (automated decision-making) because:

- AI outputs are used for organisational record-keeping, not binding decisions;
- Any decisions based on meeting content are made by humans with opportunity for human review and override;
- AI is not used for profiling or predictive analytics about individuals.

If LIST implements any automated decision-making with legal or significant effects in the future, explicit notification and protections under Article 22 will be provided.

If you believe an AI-generated summary, transcript, or analysis contains errors or misrepresents your contributions, you have the right to:

- Request explanation of how the AI processed your data and generated the output
- Request correction of inaccurate information

These rights should, where possible, be exercised before the meeting minutes are validated, to enable LIST to review and correct the underlying AI-generated output. Once the minutes have been validated by the meeting participants, any review or explanation may be limited to the information and records still available in LIST’s systems in accordance with the applicable retention rules.

13. Changes to this Notice

LIST may make changes to this Privacy Notice from time to time, to reflect our current privacy practices or to comply with changes in the applicable data protection legislation. LIST encourages you to regularly visit this page in order to remain informed on our data protection policies.