

## Microsoft Teams Recording Privacy Notice

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### I. Important Legal Terms

#### Sony Group Companies' Stream and Teams Recording Legal Terms

Please read these Legal Terms ("**Terms**") carefully. They apply when the Microsoft Stream Service and the recording feature within Microsoft Teams (together, the "**Service**"), made available by the Sony Group Companies, collects, uses, or processes your Personal Data. These Terms relate to your use of the Microsoft Stream and Teams product and do not supersede individual Sony Group Company Employee/Contractor privacy policy/ies, cookie policies, acceptable use policies, or IT and communication systems terms of use. Your Group Company may have provided more detailed information separately about how it collects, processes, maintains, and shares your personal data in connection with your use of IT and communication systems and obtained your consent to this where required. This notice applies in addition to that earlier notice.

By using the Service (including but not limited to attending or otherwise participating in a call, presentation, training session or other meeting recorded through the Service), you expressly and voluntarily agree to the following:

- Sony Group Companies and service providers may record your name, likeness, voice, speech, content you share and any other information or ideas that you express on or through the Service or display or otherwise share, and allow others to display or share, such recordings

and your accompanying identifying information (e.g., your first and last name, email, phone number, image), in any media and at any time.

- If you do not consent to the above described recording, you should mute your microphone, leave the meeting, or stop the recording feature at any time (if “stop recording” is available to your user role; see below) by clicking “More options” in the meeting controls bar and then click “Stop recording”. This stop recording function is not available for the following users: attendees, guest, anonymous, external, and federated. A description of each user is listed in the Teams Recording Privacy Guidance section below. For additional information on your Group Company privacy practices related to IT and communications systems (including Stream and Teams recording), contact your designated Group Company Privacy Officer.
- the collection, processing and use of your Personal Data as further described in your Group Company Privacy Policy, Acceptable Use Policy, or other Terms of Use which may include:
  - the use of cookies and other tracking technology and
    - the international transfer of your personal data to jurisdictions where data protection laws may not provide an equivalent level of protection to the laws of your home jurisdiction, including the United States. TEAMS RECORDINGS MAINTAINED IN CHAT, OR SAVED TO STREAM BY AN AUTHORIZED STREAM USER, ARE HOSTED IN MICROSOFT AZURE ON SERVERS LOCATED IN NORTH AMERICA. ALL RECORDINGS NOT DOWNLOADED TO YOUR ONEDRIVE ARE STORED IN THE UNITED STATES REGARDLESS OF YOUR LOCATION OR THE LOCATION OF THE MEETING ORGANIZER/PRESENTER. Consult with your Group Company Privacy Officer if you have questions on recording storage.
- the use of search technology in connection with the recordings, for Sony Group Company approved information security and legal compliance purposes, including, without limitation, the ability to search recordings based on video content, face recognition and/or dialogue within a video.
- disputes arising between you and your Sony Group Company in connection with the Service and/or these Terms will be governed by your Group Company's Acceptable Use Policy, Terms of Use for Group Company devices, network and website use, or other Group Company employee notice.

BY ACCESSING AND USING THE SERVICE (OR ANY PART THEREOF), YOU AGREE THAT YOU HAVE READ AND UNDERSTAND THESE TERMS, AND YOUR SONY GROUP COMPANY-PRIVACY POLICIES/NOTICES, ACCEPTABLE USE POLICY, AND/OR TERMS OF USE, AND THAT YOU ACCEPT AND AGREE TO BE BOUND BY THEM. IF YOU DO NOT AGREE TO THESE TERMS, YOU DO NOT HAVE AUTHORIZATION TO ACCESS AND USE THE SERVICE.

## II. Your Privacy Rights and Considerations Quick View

- a. **Limitation on use:** Teams meetings should only be recorded when necessary to achieve legitimate business purposes, including impractical time zone constraints for intended participants, mandatory trainings, executive staff messages, or as otherwise necessary to enable job performance. Meetings related to sensitive HR purposes generally should not be recorded.
- b. **Choice to stop recording:** participants can stop the meeting recording at any time by clicking on the Teams meeting controls and “More choices”. If the stop recording feature is not available to your user role (see below) and you do not want to be recorded, you may request the presenter to stop recording, or if such a request is not practical to the meeting purpose, you should go on mute or leave the meeting. If initial recorder leaves the meeting, recording will continue until all participants have left or four hours have elapsed.
- c. **Temporary storage and deletion:** recordings that are stored in the Teams meeting chat are deleted from Azure automatically after 20 days unless downloaded to a user’s OneDrive or stored in Stream by an authorized Stream user.
- d. **Location of stored recordings:** Recordings are stored on servers located in the U.S. Recordings may also be downloaded and stored in other locations by meeting attendees with access to recordings (i.e., attendee OneDrive or temporary local drive). If you do not wish your information collected during recording to be transferred to the U.S., you should either not participate in the recording, or stop the recording feature.
- e. **Access Requests and Deletion Requests (for Recordings Saved to Stream Only):** Microsoft Stream admins can export a report of everything that Stream retains about an individual user. Stream also responds to requests to delete users from Azure AD. If a recording is not stored to Stream by an authorized Stream video uploader, then it is stored in the chat in Azure for 20 days and deleted, unless downloaded by an internal participant. A description of the relationship between Teams recordings and Stream is included in the section titled “Teams Recording Privacy Guidance” below.
- f. **External Guests** – external guests cannot start or stop recording. Guests also cannot download a Teams recording unless the guest has been added to the Team in the Sony Tenant.

## III. Teams Recording Privacy Guidance

### a. Teams Meeting User Roles

Presenter	The default role all users have in a Teams meeting. Users who are presenters and internal participants can start meeting recordings (as long as they have the necessary licenses and policies).
Attendee	Attendees cannot start or stop meeting recordings. The meeting organizer can change the role of meeting participants from presenter to attendee before the meeting starts. Once the meeting has started, all presenters can change the role of other presenters to attendees, and from attendees to presenters.
Guest	A Guest is a non-Sony tenant user that has been added to a Sony Team. A Guest must have (or create) a Microsoft account that is authenticated using Azure Active Directory B2B collaboration. Guests can view files and conversations within their Team and

	can be added to a Teams meeting. However, Guests cannot stop or start a recording.
External	An Authenticated External User is a non-Sony tenant user who has joined the meeting using an Office 365 account but has not been added to a Sony Team. An example of an authenticated external user is a vendor whose company uses Office 365, and who joins a Sony Teams meeting by signing in with their company's credentials. External users are not able to send files in a meeting chat, and cannot start or stop a recording.
Anonymous	An Anonymous user is a user that has joined the meeting by typing in their name (and has not signed in with an Office 365 account). Anonymous users are generally non-Sony users. Anonymous users are not able to view or send files sent in a meeting chat, cannot access the meeting chat after they leave the meeting, and cannot start or stop a recording.
Federated	A federated user is a non-Sony tenant user whose organization's Office 365 tenant is federated with the Sony tenant. Federated users are treated as authenticated external users for the sake of Teams meetings. Federated users cannot start or stop recordings.

**b. Purpose for recording**

Be aware of local restrictions on meeting recording (if you are unsure, check with your Privacy Officer or senior management). You must have a legitimate business purpose if you intend to start a recording, and the recording must be absolutely necessary to achieve that purpose. Examples of legitimate purposes are facilitating discussion across difficult time zones, conducting mandatory training, broadcasting executive and all staff messages, and to enable job performance where technical specifications are discussed in the meeting (only where permitted by leadership and where such recording would not violate export control laws – seek advice from your local Privacy Officer and business leadership when a recording is intended for technical specifications for products or other confidential or secret data). Generally, meetings regarding sensitive HR matters should not be recorded.

**c. Start a recording**

Before you start the recording, you must let everyone participating in the meeting know that the meeting will be recorded.

**d. Stop a recording**

To stop recording, go to the meeting controls and click “More options •••”, then “Stop recording.” Any internal participants with the presenter role can stop a recording. Internal participants are “presenters” by default. You do not have to be the person who started the recording to stop it. However, guest, anonymous, external, and federated users cannot stop a recording. Additionally, participants with the attendee role, regardless whether they are internal or external, cannot stop a meeting recording. Requests to stop a recording, regardless of the role of the participant, should be respected by the presenter.

**e. Leaving the meeting/recording**

Recording continues even if the person who started the recording has left the meeting. The recording stops automatically once everyone leaves the meeting.

If someone forgets to leave the meeting, the recording automatically ends after four hours.

f. **Download a recording**

Once the recorded Teams meeting ends, the recording file will appear in the Teams meeting chat. You may download the meeting from the chat to your local temporary drive. You should immediately save the recording to your OneDrive and promptly delete the local recording file. Once the meeting recording is no longer needed to achieve the legitimate business purpose, you should immediately delete the recording from your OneDrive.

g. **Relationship between Teams and Stream**

The Teams recording feature uses Stream infrastructure. Therefore there are two storage options for Teams recordings, one option within the Teams meeting chat (unless/until downloaded by a user) and one within Stream if the presenter who recorded the meeting is an authorized video uploader in Stream. If a recording is not stored to Stream by an authorized Stream user and video uploader, then it is stored in the chat in Azure for 20 days and deleted, unless downloaded by an internal participant.

h. **External and Anonymous Users**

External and anonymous users cannot start or stop recordings, and cannot download recordings unless they have been added to a Team in the Sony Tenant.

#### **IV. How Sony Collects, Uses, and Stores your Teams Recording Data**

a. **Collect**

Teams meeting recordings are saved in the Teams meeting chat which is located in the Azure-based O365 tenant. Content created and recorded during a Teams meeting will be available following the meeting conclusion and stored in the Azure Teams service for 20 days unless downloaded by a meeting participant. After 20 days the meeting recording is deleted from the chat.

b. **Use**

Teams meetings should only be recorded when absolutely necessary to achieve a legitimate business purpose. Sony will use this recording data for the same purposes as current systems used to record meetings – i.e. to provide content to meeting participants who could not join due to time zone constraints, to provide access to demonstrations and trainings, and for discussions on technical requirements where recording may be necessary to achieve the business purpose and to enable job performance (*except recorded content, such as information regarding non-public technology, that may violate export control laws when stored in the U.S. and/or when such recordings are sent outside of the U.S.; check with your Group Company Legal Compliance team before recording such information*). Any meeting participant who is permitted to download (internal Sony users) the recording may download and use the recording for the above identified purposes.

c. **Store**

Recordings are stored in the U.S. Specifically, recordings are stored in Teams Meeting Chat for 20 days and automatically deleted unless downloaded by a user or stored in Stream by an authorized Stream video uploader. Only a predetermined subset of Teams users are authorized to upload videos to Stream. Only these users are authorized to save a Teams recording to Stream. Most Teams meetings participants will only be able to save Teams recordings from the Teams meeting chat. If they do not save a copy from the Teams meeting chat, it is deleted after 20 days. If downloaded, the meeting recording is stored on the user's local drive. It is recommended that the user then save the recording in OneDrive and delete the recording from the user's local drive. Data within chats are stored in Microsoft Azure environment which is located on United States servers. If stored in Stream, the recording is stored on Stream supported servers in the U.S. indefinitely.

d. **Retain**

Meeting recordings that are not downloaded or stored in Stream are deleted from Azure after twenty days. This is a fixed tenant setting. There is currently no way to shorten or extend that time period. If a user downloads and saves the recording file to their computer's local storage, OneDrive, or another location, it will be subject to the retention policies of that storage location.

## **V. Privacy Policies Specific to Sony Operating Companies**

- Sony Interactive Entertainment (SIE):
  - [https://sony.sharepoint.com/:b:/s/SonyGlobalLegalLink/EdPCI-yEwWdJhVv\\_95liOGkBO6t6vbCDQLbi8QA9XWRZog?e=SHaR43](https://sony.sharepoint.com/:b:/s/SonyGlobalLegalLink/EdPCI-yEwWdJhVv_95liOGkBO6t6vbCDQLbi8QA9XWRZog?e=SHaR43)