

## Privacy Notice – Recording of Business Meetings

This privacy notice tells you about the information we process as part of the recording of business meetings by Applicable. In recording of our business meetings, we serve as data controller and at times as data processors. In accordance with the law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

### Who are we?

We are Applicable Ltd (Applicable). a company registered in England and Wales (Company No. 03426111 whose registered office is at C/O Rwk Goodman Llp Midland Bridge House, Midland Bridge Road, Bath, England, BA2 3FP. Our main office of operation is 3120 Great Western Court, Bristol, BS34 8HP. You can contact us by post FAO Data Protection Officer at the above address or by email at [dpo@applicable.com](mailto:dpo@applicable.com).

Following the UK's exit from the European Union, as of the 1<sup>st</sup> January 2021 we are required to provide a Data Protection Representative within the EEA allowing data subjects to raise matters directly to this representative for the purposes of GDPR. Applicable have appointed DataRep to undertake this role on our behalf and they can be contacted by email at [applicable@datarep.com](mailto:applicable@datarep.com) or at the postal address locations at the end of this Notice. Please note that when mailing enquiries, it is essential that you mark your letters for attention of 'DataRep' and not Applicable Ltd, but please refer clearly within your correspondence to Applicable Ltd.

### How do we use your personal data?

#### Recording of Business Meetings

In line with the General Data Protection Regulation (GDPR – EU and UK) and the Data Protection Act 2018 (DPA 2018).

At Applicable Ltd, meetings are sometimes recorded in order to enable an accurate record of the meeting, to assist minute takers to fulfil their task or to enable meeting participants (or non-attendees) to access a recording of a meeting.

Depending on how the meeting is held, this may include the recording of audio or in addition video and if the feature exists the automated production of a transcript. Parts of a recording could count as personal data according to data protection laws. Personal data in recordings would/could include images of participants and information contributed during the meeting.

This privacy notice is to tell you how that personal data is used and protected by Applicable Ltd. The lawful basis for processing this personal data is legitimate interests. This applies when the data processing is not required by law but is of a clear benefit to the organisation. Should there be a need to record meetings relating to special category information the lawful basis for doing so for Applicable as an employer would be Article 9 b "processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment " and/or h. "processing is

necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee”

You will not be requested to give consent for the recording as that is not the lawful basis (unless Article 9 applies as per above), however you will be aware by displayed screen messages that the meeting is being recorded. If you do not want to be recorded, your rights as an individual data subject are to mute your microphone, turn off your webcam, choose not to contribute or leave the meeting. If Article 9 applies you can choose to request the meeting is not recorded.

The recordings will be kept securely on the communications site utilised (e.g. Microsoft Teams) or on Applicable systems, covered under the ISO27001 controls of the business. As Applicable is an international business, recording may be activated and accessed outside of the UK and EEA. If you are a meeting participant, (internal to Applicable), you will have access to the recording once the meeting is completed. If you are outside of the business and have joined as a ‘Guest’, you will need to request access to the recording from the meeting host.

Any sensitive meeting content recorded in relation to Applicable HR activities will be held in restricted access areas.

Once the need for the recording has been completed, the recording will be deleted in line with Applicable’s Retention Policy.

Applicable will not share any recordings with any other organisation than those participating, unless required to by law.

Anyone given access to a recording, you must not make duplicates unless permission is provided by the Applicable Data Protection Officer ([dpo@applicable.com](mailto:dpo@applicable.com)).

No downloads or storage of any recordings are permitted to any personal device or a non-Applicable cloud storage facility.

### **Your rights over your information**

By law, you can ask us what information we hold about you, request to have access to it, and you can ask us to correct it if it is inaccurate.

In those cases where we process your information for contractual reasons, you can ask us to give you a copy of the information.

If you believe we are not using your information lawfully, you can ask us to stop using it for a period of time. In some circumstances, you may have the right to ask us to erase your personal data.

We apply the same high level of data privacy and rights to all employees and those we interact with in all our countries of operation.

To submit a request by email or post, please use the contact information provided above.

### **Your right to complain**

If you have a complaint about our use of your information, we would prefer you to raise it with us in the first instance to give us the opportunity to put it right, in the UK you as escalation you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:

Information Commissioner's Office  
 Wycliffe House  
 Water Lane  
 Wilmslow  
 Cheshire, SK9 5AF

In the EU, as escalation you can contact the Autoriteit Persoonsgegevens (formerly known as the College Bescherming Persoonsgegevens) via their website at <https://autoriteitpersoonsgegevens.nl/en> or write to them at:

Autoriteit Persoonsgegevens  
 PO Box 93374  
 2509 AJ Den Haag  
 The Netherlands

### DataRep Contact Addresses

Country	Address
<b>Austria</b>	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
<b>Belgium</b>	DataRep, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
<b>Bulgaria</b>	DataRep, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
<b>Croatia</b>	DataRep, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
<b>Cyprus</b>	DataRep, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
<b>Czech Republic</b>	DataRep, Platan Office, 28. Října 205/45, Floor 3&4, Ostrava, 70200, Czech Republic
<b>Denmark</b>	DataRep, Lautruphøj 1-3, Ballerup, 2750, Denmark
<b>Estonia</b>	DataRep, 2 <sup>nd</sup> Floor, Tornimäe 5, Tallinn, 10145, Estonia
<b>Finland</b>	DataRep, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
<b>France</b>	DataRep, 72 rue de Lessard, Rouen, 76100, France
<b>Germany</b>	DataRep, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
<b>Greece</b>	DataRep, Ippodamias Sq. 8, 4th floor, Piraeus, Attica, Greece
<b>Hungary</b>	DataRep, President Centre, Kálmán Imre utca 1, Budapest, 1054, Hungary
<b>Iceland</b>	DataRep, Kalkofnsvegur 2, 101 Reykjavík, Iceland
<b>Ireland</b>	DataRep, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
<b>Italy</b>	DataRep, BPM 335368, Via Roma 12, 10073, Ciriè TO, Italy
<b>Latvia</b>	DataRep, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
<b>Liechtenstein</b>	DataRep, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
<b>Lithuania</b>	DataRep, 44A Gedimino Avenue, 01110 Vilnius, Lithuania
<b>Luxembourg</b>	DataRep, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
<b>Malta</b>	DataRep, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
<b>Netherlands</b>	DataRep, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
<b>Norway</b>	DataRep, C.J. Hambros Plass 2c, Oslo, 0164, Norway

<b>Poland</b>	DataRep, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
<b>Portugal</b>	DataRep, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
<b>Romania</b>	DataRep, 15 Piața Charles de Gaulle, nr. 1-T, București, Sectorul 1, 011857, Romania
<b>Slovakia</b>	DataRep, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
<b>Slovenia</b>	DataRep, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
<b>Spain</b>	DataRep, BPM 335368, Avd. Castilla La Mancha N° 70-1 (Nave A), 45270, Mocejon-Toledo, Spain
<b>Sweden</b>	DataRep, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden
<b>Switzerland</b>	DataRep, Leutschenbachstrasse 95, ZURICH, 8050, Switzerland