EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF

PROCESSING PERSONAL DATA RELATED TO AI-GENERATED MINUTES VIA THE EEAS AI MINUTES OF MEETINGS (MOMS) TOOL BY THE EEAS

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS), including the Delegations of the European Union. You have the right under EU law to be informed when your personal data is processed [e.g. collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of the present processing activity is to provide a secure, standalone application that transforms meeting audio or video recordings into draft AI-generated transcriptions and structured minutes, tailored to EEAS needs.

Description

Users can upload audio or video recordings and, optionally, import meeting details from Outlook to generate an attendance list for inclusion in the draft minutes. The processing includes optional speaker diarisation, automatic speech-to-text transcription, generation of draft minutes, and terminology correction based on EEAS-specific taxonomy. Optional speaker diarisation distinguishes speech segments between different speakers without automatically assigning names or inferring the identity of the speakers.

All processing takes place locally within the EEAS infrastructure on an open-source model installed on EEAS infrastructure. The original recording, the converted audio file, and the raw transcription data are each retained for 24 hours. The transcript, minutes, chat, tasks and mind map are deleted 72 hours after they are generated.

The user remains fully responsible for reviewing, editing and validating the content, and retains full editorial responsibility for any final version used or shared.

On meetings with participants other than EEAS, EU institution, Member State authority and EEAS contractual partner staff members, consent may be requested before the recording. Means of collecting consent may be a pop-up screen, the chat box, the participant list, the invitation or the registration form.

3. DATA PROCESSED: What data do we process?

The data, including personal data, which may be processed for that purpose are the following:

Personal data processed may include voice data, names and surnames, function, professional contact details, meeting participation details, and personal data contained in the audio/video recording, transcript and draft minutes.

The data related to participation of EEAS staff participating in the meetings are also covered by the Notification personal data processing compliance record on the Use of Basic Personal Data for Professional Purposes (e-DPO 221) and its Privacy Statement.

The data related to external participants to EEAS meetings are also covered by the personal data processing compliance record on Events and Meetings organised by EEAS services and EU Delegations (e-DPO 101) and its Privacy Statement.

Information provided about the identity of the participants during the "tour de table" or in their contribution is assigned to their voice signature but the voice signature is erased after having been used for the minutes.

4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controller determining the purpose and the means of the processing activity is the European External Action Service (EEAS). The EEAS Division entrusted with managing personal data processing under the supervision of the Head of Division is the following organisational entity:

RM.TSO.1 - Artificial Intelligence, Information and Data Governance division

5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

Only the drafter sees the transcript. The draft minutes edited by the drafter will be sent to meeting participants (within or outside the EEAS) and authorised EEAS staff on a need-to-know basis, including staff of the relevant department, division or Delegation and, where necessary, their counterparts at headquarters or in Delegations. The approved minutes may be distributed on a need to know basis to EU institutions and their partners.

Personal data is not intended to be transferred to a third country or an international organisation, except where necessary for providing access to recipients as described above. In case of international transfers appropriate safeguards are ensured in accordance with Chapter V of Regulation (EU) 2018/1725. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.

6. ACCESS, RECTIFICATION AND ERASURE OF DATA: What rights do you have?

You have the right of access to your personal data and the right to correct your inaccurate or incomplete personal data, taking into account the purpose of the processing. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you wish to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

ai-tools@eeas.europa.eu

7. LEGAL BASIS: On what grounds do we collect your data?

Lawfulness:

The processing of your personal data of data subjects (interlocutors, stakeholders, etc.) who are EEAS, EU institution, Member State authority and EEAS contractual partner staff members is necessary for the performance of a task carried out by the European External Action Service in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725 as referred to in Recital 22 thereof].

The processing of the voice signature linked to the contributions and the uploaded attendance list of external data subjects (citizens, journalist, etc.) other than EEAS, EU institution, Member State authority and EEAS contractual partner staff members is based on consent [Article 5(1)(d) of Regulation (EU) 2018/1725].

Legal reference:
Article 27.3 TEU

Further legal reference:
Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) – OJ L 201, 3/8/2010, p. 30.

8. TIME LIMIT & DATA SECURITY: for what period and how securely do we process your data?

Storage period
The original recording, the converted audio file, and the raw transcription data are each retained for 24 hours. The imported meeting details and the voice signatures are erased after having been used for the minutes. The transcript, minutes, chat, tasks and mind map are deleted 72 hours after processing, even if they have not been downloaded. Users may also choose the 'delete' option, which erases the text instantly. No data are transferred to external cloud service providers or external processors for the purpose of generating the transcript and draft minutes.

Security of data
Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies of personal data are stored in a properly secured manner.
Specific security measures :
The data are processed and temporarily stored in the EEAS specific IT application based on an open source EEAS model for generating AI-augmented minutes of meetings.
Access to the tool is provided via the EEAS Connect authentication system.

9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?

If you have enquiries you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu.

10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at edps@edps.europa.eu.