

Before you switch Microsoft Copilot on

Five checks, in order. Admin paths as Microsoft documented them; checked on 12 October 2026.

☐ 1 Review sharing permissions

Copilot surfaces only data each user can at least view, so over-shared files become easy to find. Restrict folders, sites and channels shared with the whole organisation or external guests, and apply sensitivity labels to the files that matter most.

Microsoft Learn, Data, Privacy, and Security for Microsoft Copilot, page dated 9 Jul 2026.

☐ 2 Decide flex routing on purpose

On by default for eligible EU tenants created after 25 March 2026. At peak load, prompts may be processed in the United States, Canada or Australia. Requires the AI Administrator role.

Microsoft 365 admin center → Copilot → Settings → View all → Flex routing during peak load periods

Microsoft Learn, Flex routing (EU and EFTA), page dated 29 Sep 2026.

☐ 3 Keep Anthropic off unless decided

Anthropic models are excluded from the EU Data Boundary and off by default in the EU, EFTA and UK. Keep "Anthropic models with Data Retention" off: that data sits outside your Microsoft agreement.

Microsoft 365 admin center → Copilot → Settings → AI providers operating as Microsoft subprocessors (default: No users)

Microsoft Learn, Anthropic models in Microsoft Online Services, page dated 18 Sep 2026.

☐ 4 Decide on web search

Web search is available unless the policy is configured. Bing queries fall under Microsoft's terms as controller, outside the DPA and the EU Data Boundary. Block the consumer Copilot for work use.

Cloud Policy service for Microsoft 365 → policy "Allow web search in Copilot"

Microsoft Learn, web search in Microsoft Copilot, page dated 18 Aug 2026; SURF DPIA update, 27 May 2026.

☐ 5 Set retention and run the DPIA check

Set Purview retention for Copilot interactions, write the staff rule for checking output about people, and document the DPIA decision. Involve the works council where there is one.

DSK guidance on AI, 6 May 2024 (DPIA often required); Hamburg checklist, 13 Nov 2023.

Know before you start

- The contract: Microsoft's DPA and Product Terms cover Copilot and Copilot Chat on work accounts, with Microsoft as processor; prompts and Graph data are not used to train foundation models.
- Hessian Commissioner, 15 Nov 2025: compliant Microsoft 365 operation is possible on the DPA. The report assessed the contract and does not mention Copilot.
- SURF, 27 May 2026: 2 medium and 10 low risks remain for Copilot, including 18-month retention of pseudonymised service data.

Not legal advice. Sources and full notes: yardwork.dev/en/blog/copilot-gdpr. Microsoft changes names and defaults often; check your tenant against the dates above.