

# GDPR Notice for AudioCodes VoiceAl Connect Enterprise - Shared Environment -

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This document describes the VoiceAI Connect Enterprise support for General Data Protection Regulation (GDPR). GDPR aspects that are not listed in this document are considered as not relevant to the VoiceAI Connect Enterprise product operation. This notice is subject to <u>AudioCodes Privacy Policy</u>.

### **1** Overview and Definitions

GDPR defines 'personal data' as any information related to an identifiable person. This person may be identified directly (i.e., by name) or indirectly through any other identifier which is unique to that person. In the VoiceAI Connect Enterprise, individuals can be directly identified by name or indirectly identified through other identifiers such as phone numbers.

#### Definition:

*Provider* is the AudioCodes customer that is using the VoiceAI Connect Enterprise to offer a service (or solution) to its Tenants.

*Tenant* is the end business customer that is subscribing to the Provider's service. For example, the Tenant dials to a voice-bot service that was built by the Provider, using AudioCodes VoiceAI Enterprise.

The VoiceAI Connect Enterprise manages, collects, and stores the following information:

#### a) CDR Records:

Call Detail Records (CDR) contain information on calls made from the Provider's Tenants' devices. Information that may be defined as private information in CDR records could include, for example, Provider chatbot or Tenant caller phone number and Tenant called phone number.

CDRs are generated once at the end of the session. CDRs are stored locally and on a central monitoring system operated by AudioCodes support team. CDRs are optionally available to the VoiceAI Connect Enterprise Provider and VoiceAI Connect Enterprise Administrator and can be used for calculating and reviewing billing.

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#### b) Call Transcripts:

Call transcription is the conversion of a voice call audio track into written words, which is stored as plain text. VoiceAI Connect Enterprise can store chatbot call transcripts (speech-to-text) locally. Tenants' information that may be defined as private information in the transcript may include personal conversation information. Transcripts are available only to the VoiceAI Connect Enterprise Provider and can be used by the Provider to verify that call progress is as planned.

#### c) Syslog Notifications:

Syslog is an event notification protocol that enables a device to send event notification. Information that may be defined as private information in Syslog events may include, for example, the Tenant's caller and called phone numbers. VoiceAI Connect Enterprise saves Syslog notifications locally.

Syslog notifications is available only to the VoiceAl Connect Enterprise Administrator and is use for debugging.

#### d) Provider Settings:

Provider settings is a collection of Provider configurations, which is stored locally. This configuration includes, as an example, the following:

- Bots' and speech providers information
- SIP Connections configuration

### 2 Right of Access (Art 15)

The Section 'Overview and Definitions' (above) fully outlines what data the VoiceAI Connect Enterprise collects and saves as personal data.

Access to CDRs, call transcripts, Syslog notifications, Provider information is limited to privileged users only with required valid credentials. Once appropriate credentials are provided:

- Providers with access to REST API can download their call transcripts.
- Administrators with access to the Web interface or REST API can view and download CDRs, call transcripts, Syslog files, and Provider settings.

Detailed information on how the Provider can retrieve the above can be found in the VoiceAI Connect Enterprise <u>technical documentation</u>.

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### **3** Right to Rectification (Art 16)

CDRs, call transcripts, and Syslog notifications are treated by VoiceAI Connect Enterprise as 'read-only' information as soon as it's stored in the database/disk. VoiceAI Connect Enterprise does not include a mechanism that allows a user to edit or modify the information once captured and stored, and there are no actions that the application takes based on this information.

### 4 Data Retention and the Right to be Forgotten (Art 17)

The information collected by VoiceAI Connect Enterprise as described in the Section 'Overview and Definitions' can be removed to erase personal data.

#### a) CDR Records:

The calls information is stored for a 45-day period. This allows AudioCodes to address any questions of the Provider during this period. Once this period elapses, the call information is deleted automatically.

#### b) Call Transcripts:

Transcription is removed after 24 hours. This provides sufficient time for the Provider to use call transcripts to track service issues. Once this period elapses, call transcript information is deleted automatically.

#### c) Syslog Notifications:

Syslog notification is stored for a 45-day period. This allows the AudioCodes Administrator to address any call history issues. Once this period elapses, the syslog information is deleted automatically.

#### d) Provider Setting:

Provider setting retention period is the length of the service contract. The Administrators can delete Provider settings using the VoiceAI Enterprise web interface. This explicit deletion deletes all Provider setting information.

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### 5 Right to Data Portability (Art 20)

Personal data which is stored in VoiceAI Connect Enterprise, as defined in Section 'Overview and Definitions' of this document, may be retrieved by the Provider and or by the Administrator and sent to a data subject.

It is the Provider's responsibility to comply with the applicable Privacy laws after downloading any personal information.

#### a) CDR Records:

Providers can save their own call information to a text file. The calls are saved to a text file according to the procedure defined by the VoiceAl Connect Enterprise <u>technical</u> <u>documentation</u>.

The calls recorded in the text file may contain Tenant personal data which is not related to the data subject. For example, if the data subject is the caller of the call, the callee personal data of the same call may also be part of the call record in the text file. It is up to the VoiceAI Connect Enterprise Provider to make sure that Tenant personal data is not exposed to the data subject. It is beyond the VoiceAI Connect Enterprise product's scope to erase other personal data that is not related to the data subject's personal data from the text file.

#### b) Call Transcript:

Providers can save their own call transcript file, which can then be sent to the data subject. The calls are saved to a file according to the procedure defined by the VoiceAI Connect Enterprise technical documentation. The call transcript file may contain Tenant personal data which is not related to the data subject. It is up to the VoiceAI Connect Enterprise Provider to make sure that other personal data is not exposed to the data subject. It is beyond the VoiceAI Connect Enterprise product's scope to erase other personal data that is not related to the data subject's personal data from the transcript file.

#### c) Syslog Information:

Only the VoiceAI Connect Enterprise Administrator can access the syslog file. The syslog file may include other personal information. The syslog file is not shared with any Provider and is used only by the Administrator for debugging purposes.

#### d) Provider Setting:

Administrator can view their own account setting information in the VoiceAI Connect Enterprise through the VoiceAI Connect Enterprise web interface (e.g., Bot and SIP Connections). Provider settings can then be saved as a text file or any other method such as a screen capture and alike and sent to the Provider.

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## 6 Responsibility of the Controller and Data Protection by Design and by Default (Art 24 and 25)

The service provides security measures that only allow authorized users to have access to the VoiceAI Connect Enterprise portal information and settings. Access to personal data stored in the VoiceAI Connect Enterprise is protected and requires a username and password to view and retrieve any personal data from the VoiceAI Connect Enterprise.

#### a) VoiceAl Connect Enterprise Web Access:

Access to the VoiceAI Connect Enterprise 's web interface is only performed by Administrators who have rights to log in to the VoiceAI Connect Enterprise. VoiceAI Connect Enterprise users are authenticated and authorized using a username and password.

AudioCodes Administrator can access the following information: Provider CDRs, Syslog notification, Provider settings.

#### b) VoiceAl Connect Database Access:

VoiceAI Connect Enterprise uses databases as part of its operation. The databases are embedded inside the VoiceAI Connect Enterprise and cannot be accessed directly. They are used only by the VoiceAI Connect Enterprise application. To offer data protection at rest file systems are encrypted using industry-standard encryption.

#### c) Data in Transit:

By default, VoiceAI Connect Enterprise implements encrypted communication for signaling, media and syslog information (secure SIP and SRTP) and uses HTTPS for bot-frameworks and cognitive services.

### 7 End of Contract

The Provider can ask to delete its own account. Delete requests are sent to the VoiceAI Connect Administrator, and the Administrator then initiates the following:

- Deletes all Provider call transcripts and Provider settings. Once initiated, deletion may take up to 24 hours to complete.
- Provider CDR records may be kept for 45 days to address Provider queries. Once this retention time elapses, all information is deleted except for the Provider's email and account deletion date.
- For information on how to perform an end of contract (Delete Provider), please contact AudioCodes at <u>https://www.audiocodes.com/services-support</u>.

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