

GDPR Notice

AudioCodes SmartTAP 360° Live

AudioCodes SmartTAP 360° Live solutions provide the customer/administrator with the necessary tools that are required for compliance with the General Data Protection Regulation (GDPR), under the assumption that the customer is a Controller as defined under the GDPR.

The purpose of this document is to provide details for these different tools. GDPR aspects that are not listed in this document are not relevant to the SmartTAP 360° Live product operation.

1 Overview and Definitions

GDPR defines ‘personal data’ as any information related to an identified or identifiable natural person. This person may be identified directly (e.g., name, i.d. number, etc.) or indirectly through any other identifier who is unique to this person (“Data Subject”). For SmartTAP 360° Live, individuals can be directly identified by name or indirectly identified through other identifiers such as phone numbers and email addresses.

SmartTAP 360° Live manages, collects, and stores the following information:

- a) **Call recording:** SmartTAP 360° Live records and stores call-related information and call media that it receives from the different communication platforms such as SBCs, Microsoft Lync, Skype for Business, Teams, and more. Call recordings may include the following information which may be used to identify a person:
- I. Caller name
 - II. Caller phone number
 - III. Caller URI
 - IV. Callee name
 - V. Callee phone number
 - VI. Callee URI
 - VII. Answered party name
 - VIII. Answered party number
 - IX. Answered party URI
 - X. Redirected by party name
 - XI. Redirected to party name
 - XII. Call media (audio, video, sharing)
 - XIII. Call transcript (referred as part of call media below)

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- b) Users' information:** SmartTAP 360° Live can be configured to connect to Active Directory using LDAP protocol or to Microsoft Azure Active Directory to retrieve users' information into the SmartTAP 360° Live database. This information is used in SmartTAP 360° Live to correlate between the call data and the actual user names. The users' personal data includes the following information which may be used to identify a person:
- I. First and Last names
 - II. Account name
 - III. Alias
 - IV. Email
 - V. Additional fields defined by your organization, such as phone number, MSFT SIP URI or Tel URI to identify the user for recording
- c) Logs:** SmartTAP 360° Live log messages stored in SmartTAP servers may contain CDR private information such as caller, callee, answering party, redirected to/by party names, and phone numbers.

2 Right of Access (Art 15)

The SmartTAP 360° Live administrator can log in to the Web Management Interface using secured and encrypted Web access and look for the personal data upon request of a Data Subject. More information can be found in Section 'Right to Data Portability (Art 20)' below.

Detailed information about the SmartTAP 360° Live Web Management Interface can be found in the SmartTAP 360° Live Administrator's Guide.

3 Right to Rectification (Art 16)

In the SmartTAP 360° Live system, the user information is controlled by the SmartTAP 360° Live administrator through the Web Management Interface only. The SmartTAP 360° Live administrator can create, delete, and edit users' personal information and can rectify personal information per request. If user information is mapped from an external source it cannot be changed in SmartTAP 360° Live.

The Call information and media are processed and stored on-the-fly in the SmartTAP 360° Live database and in media storage respectively. There is no mechanism which allows a user to edit or modify the information or media once it is captured and stored as part of a normal operation.

Detailed information on how to delete a user or call recordings is described in the SmartTAP 360° Live Administrator Guide.

4 Right to be Forgotten (Art 17)

The information collected by the SmartTAP 360° Live as described in Section ‘Overview and Definitions’ can be removed to erase personal data:

- a) **Call recording:** The call recording is stored for a specific time range and according to the customer’s predefined retention policies. Once this time range elapses, the call recording is deleted automatically. In case there is a need to immediately erase personal information in a call recording, the SmartTAP 360° Live administrator can do so by deleting the call recording.
- b) **Users’ information:** The SmartTAP 360° Live administrator can delete a user-defined in SmartTAP locally or by removing the mapping of the user from an external source. The deleted user will be defined as an inactive user in SmartTAP 360° Live.

Detailed information on how to delete a user or recording can be found in the SmartTAP 360° Live Administrator Guide.

5 Right to Data Portability (Art 20)

Personal data which is stored in the SmartTAP 360° Live as defined in Section ‘Overview and Definitions’ may be retrieved by the SmartTAP 360° Live administrator and sent to a Data Subject.

- a) **Call recording:** The SmartTAP 360° Live administrator can export the call recording details to an excel file and the media to a media file. These files can then be sent to the Data Subject only if permitted by local laws. The call recording details in the excel file or the recorded media may contain other personal data that is not related to the Data Subject. It is the SmartTAP 360° Live customer’s responsibility to make sure that other personal data except for the Data Subject’s personal data is not exposed. The SmartTAP 360° Live administrator can select which fields to expose using Configure Export File Columns options of the call recording export to excel file feature. The exported media files cannot be altered, and it is in the SmartTAP 360° Live customer’s responsibility to decide whether to expose the media to the Data Subject. Detailed information on how to select columns of call recording information and then save to an excel file is described in the SmartTAP 360° Live Administrator Guide.
- b) **Users’ information:** Users' information in SmartTAP 360° Live can be retrieved via the SmartTAP 360° Live Web interface. The SmartTAP 360° Live administrator can select a specific user in the SmartTAP 360° Live Users tab to view full user details. The specific user’s details can be exported to a file by the AudioCodes Professional Services Team. The saved user’s details file can then be sent to the Data Subject. Detailed information on how to view a user’s information in the SmartTAP 360° Live Web interface is described in the SmartTAP 360° Live Administrator Guide.

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

Access to personal data stored in the SmartTAP 360° Live is protected and requires a username and password to look and retrieve any personal data from SmartTAP 360° Live.

- a) **SmartTAP 360° Live Web access:** Access to the SmartTAP 360° Live Web interface either via a browser or REST API is performed by administrators who have permissions to log in to SmartTAP 360° Live and view the personal data. SmartTAP 360° Live administrators can be authenticated and authorized either locally on the SmartTAP 360° Live server or using a centralized third-party authentication server such as Active Directory or Microsoft Identity server. The traffic between the SmartTAP 360° Live Web client and the SmartTAP 360° Live server is secured using the HTTPS protocol.
- b) **SmartTAP 360° Live Servers access:** Access to the SmartTAP 360° Live server is protected by username and password. The access transport to the SmartTAP 360° Live server is secured over protocols such as SSH for CLI connection to the SmartTAP 360° Live server, SmartTAP 360° Live Server access is under the customer's responsibility when SmartTAP is hosted in the customer's public cloud or on-premises.
- c) **SmartTAP 360° Live Data security at Rest:** SmartTAP 360° Live data at rest is inactive data that is stored physically in a digital form such as call records and media. It is stored encrypted utilizing disks or storage encryption and application-level encryption for the audio. Disks and storage encryption are under the customer's responsibility when SmartTAP is hosted in the customers' public cloud or on-premises.
- d) **SmartTAP 360° Live Data Security in Transit:** SmartTAP's data in transit is data flowing through the communications network between the various system elements. SmartTAP's data in transit is encrypted using secure protocols such as HTTPS, SRTP.
- e) **SmartTAP 360° Live Database accessibility:** SmartTAP uses a database as part of its operation. The database is located on the SmartTAP server and is used only by the SmartTAP application. Accessing the database requires a specific database administrator login and password to access the database content.

Detailed information about SmartTAP 360° Live access permissions are described in the SmartTAP 360° Live Administrator Guide.

7 Disposal Process

The SmartTAP 360° Live solution can operate using multiple platforms. If the installation platform is virtual (e.g., VMware), cloud (e.g. Microsoft Azure), or a dedicated bare metal machine, the disposal operation should be performed on the virtual, cloud, or bare metal machine platform levels and is beyond the scope of the SmartTAP 360° Live product.

This operation erases all data from the SmartTAP 360° Live servers and restores it to its initial state, removing all personal data as defined in this document.

The SmartTAP 360° Live server can store the media on multiple platforms such as local disk, NAS/SAN storage and on Cloud storage. The disposal operation should be performed by deleting the stored media folders and is beyond the scope of the SmartTAP 360° Live product.

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