GDPR and HIPAA-Ready Notice for AudioCodes Voca Solution

The AudioCodes Voca solution provide healthcare customers with services that are ready to accept Protected Health Information (PHI), referring to these services as Health Insurance Portability and Accountability Act (HIPAA)-Ready Services.

AudioCodes Voca solutions provide customers with services that are ready to accept Personal Identifiable Information (PII), referring to these services as General Data Protection Regulation (GDPR)-Ready Services.

AudioCodes provides all the necessary tools for the customer/administrator to be GDPR and HIPAA Compliant. The purpose of this document is to detail the different tools which help the customer remain compliant. GDPR/HIPAA aspects that are not listed in this document are not relevant to the Voca product operation.

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 that is unique to that person.

The HIPAA privacy rule defines all individually identifiable health information that is held or transmitted.

1.1 Call Information

Voca optionally collects and stores call-related information.

Call data includes the following information which may be used to identify a person:

- Caller phone number
- Called phone number
- Call start time
- Call end time
- Duration of the call
- Audio recordings of the caller's interaction with Voca

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1.1.1 Call Information Retention Period

If the customer decides to store the call information, the retention period needs to be configured. The Call information retention period will be configured during the setup phase.

1.2 User Information

The Voca system can be configured to connect to the Active Directory using the LDAPs protocol to retrieve the organization's contacts information, into the Voca database. This information is collected in accordance with the service and may vary depending on the activity. The organization contacts' data may include the following information:

- First and last name
- Job title
- Phone numbers
- Mobile Phone number
- Email addresses
- Department

1.2.1 User Information Retention Period

The user information retention period will be as long as the customer uses the system and it is the customer's responsibility to destroy/delete the data if the system is no longer used.

2 Right of Access (Art 15)

The Overview and Definitions section above fully outlines what data the Voca system collects and saves as personal data.

The Voca administrator can log in to the Web Management Interface using secured and encrypted Web access and look at the 'personal data'. Detailed information on the Voca Web Management Interface can be found in the Voca Administrator's Guide.

The Voca administrator can export the personal data outside of the Voca system. More information can be found in the Right to Data Portability (Art 20) section below.

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3 Right to Rectification (Art 16)

The user's information is taken from external sources but can be modified locally if needed.

The Call information is processed and stored on-the-fly in the Voca database. There is no mechanism that allows a user to edit or modify the information once captured and stored as part of normal operation.

In the Voca system, the information is controlled by the Voca administrator through the Web Management Interface only. The Voca administrator can create, delete and edit the personal information and can rectify personal information per request.

4 Right to be Forgotten (Art 17)

The information collected by the Voca system as described in Section 1 can be removed to erase personal data.

4.1 Call Information

Call information is stored for a specific time range. Once this time range elapses, call information is deleted automatically. The retention time a call remains in the Voca database is configurable by the Voca administrator, to adhere and facilitate the relevant Data Protection policy required by the administrator.

If there is a need to immediately erase personal call information, the Voca administrator should approach AudioCodes for immediate support.

4.2 User Information

User information can be imported from the Active Directory server using the LDAPS protocol or uploaded through a file to the Web Management Interface, to be created manually. User information is actively retrieved by Voca. To erase the imported personal user information, the Voca administrator can terminate the connection with the Active Directory and manually delete all the users and their personal data from the Voca Web Management Interface on demand.

Detailed information on how to delete a Contact from the Voca system can be found in the Voca Administrator's Guide.

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5 Right to Data Portability (Art 20)

Personal data which is stored in the customers OVOC as defined in Call Information above, may be retrieved by the Voca administrator and sent to a data subject.

5.1 Call Information

The Voca administrator can save call information to a CSV file, which then can be sent to the data subject. The calls saved to the CSV file, are according to the filters defined by the Voca administrator, who may use the Voca filter feature to filter only the calls related to the data subject, prior to saving the calls to a CSV file.

The call records in the CSV file may contain other 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 CSV file. It is up to the Voca customer to make sure that other personal data is not being exposed to the data subject. It is out of the Voca product's scope to erase other information from the CSV file, that is not related to the data subject personal data.

Detailed information on how to filter call information and save it to a CSV file in the Voca system, can be found in the Voca Administrator's Guide.

5.2 User Information

User information in the Voca system can be retrieved using the Voca Web Management Interface. The Voca administrator can select a specific user and see its full user details. The specific user's page can then be copied to a text file or screen capture. The saved user's details file can then be sent to the data subject.

As with Call information, also the Contacts section in the Voca Web Management Interface may include other personal information. It is up to the Voca customer to make sure that others personal data is not being exposed to the data subject.

Detailed information on how to view Contact's information can be found in the Voca Administrator's Guide.

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6 Security of Processing (Art 32), Data Protection by Design and by Default (Art 25) and HIPAA Security Rules

6.1 Encryption of Personal Data

- Voca is configured by default: Caller speech inputs, Caller number.
- This data is saved encrypted on disk.
- Configuration can be changed to NOT saving any caller data.
- Voca can also be configured to mask the Caller number to show only the last 4 digits.
- Data in Transit is encrypted:
  - AudioCodes SBC creates TLS and SRTP session between caller and Voca.
  - Traffic from Voca to any 3rd party system is running over the HTTPS session.

6.2 Access Control to Voca on Premises

- Voca has two connectivity options: RDP or Web UI
- Access by RDP is relevant for customer support by AudioCodes only on a “need to” access. The customer is responsible to provide the secured connection and authentication method.
- Voca Web access is for customers’ operational usage. The preferred way is to synchronize Voca to customers’ Azure AD and use the MFA and credentials as defined in the customer’s policy.
- Voca also provides the ability to use local users. This method is not recommended.

6.3 Access Control to Database

- The database is based on MySQL and might contain PII or PHI in case the customer chooses to do so.
- Access to the database is pre-configured during the installation phase to a default one but can be replaced by another one known to the customer only. In that case, it is the customer’s responsibility to save the credentials and retrieve it when database support is needed.

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6.4 Backup

- Voca can set the backup for all server configurations. The data is scheduled at intervals to the external storage. It is the customer's responsibility to provide the secured encrypted storage.

6.5 Segregation Control

The Voca system has several Web UI levels of users:

- **Super Admin:** This user is used ONLY by AudioCodes to set licensing and features.
- **Provider Admin:** This user is used to configure and maintain, on behalf of a tenant admin, the Voca server and Tenants (optional).
- **Tenant Admin:** This user is used to configure and maintain specific tenants.
- **Analytic User:** This user is used to view and generate reports global or per tenant.

7 Disposal Process

The Voca system can run on multiple platforms. If the platform is virtual (e.g., VMware) or cloud (e.g., AWS), the disposal operation should be done on the virtual or cloud platforms level and is out of the Voca product's scope.

If the Voca server runs on a hardware server provided by AudioCodes, an administrator-level user can perform a clean installation process operation on the Voca server, to remove any personal information from the system before disposal.

This operation erases all data from the Voca server and returns it to its initial state, removing all 'personal data' as defined in this document. Detailed information on how to clean install the Voca server can be found in the Voca Installation Manual.

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