GDPR Notice for AudioCodes Live Hub

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This document describes the Live Hub support for General Data Protection Regulation (GDPR). GDPR aspects that are not listed in this document are considered as not relevant to the Live Hub operation.

This notice is subject to Live Hub Terms of Service and Privacy Policy.

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 Live Hub, 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 Live Hub 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 Cloud.

The Live Hub 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 and stored locally on Live Hub. CDRs are available to the Live Hub Provider and Live Hub Administrator and can be used for calculating and reviewing billing.

b) **Call Transcripts:**

Call transcription is the conversion of a voice call audio track into written words, which is stored as plain text. Live Hub 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. Saving call transcript is up to the Provider. By default, transcription is not done. Transcripts are available only to the Live Hub Provider and can be used by the Provider to verify that call progress is as planned.

c) **Call Recording:**

Live Hub can store the recordings of the audio sessions. Tenants' information that may be defined as private information in the recording may include personal conversation information Saving call recording is up to the Provider. By default, recording is not done. Recording is available only to the Live Hub Provider and can be used by the Provider to verify call progress is as planned.

d) **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. Live Hub saves Syslog notifications locally.

Syslog notifications is available only to the Live Hub Administrator and is use for debugging.

e) **Provider Information:**

Live Hub is a SaaS service where Providers create their own account. Provider data includes contact information which may be used to identify a Provider, as example, the following information is captured:

- First name
- Last name
- Email
- Phone number
- Company name

f) **Provider Settings:**

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

- Bots' information
- Phone numbers purchased from AudioCodes
- SIP Connections

g) **Provider Billing Information:**

Provider billing information contains monthly billing summary and billing details (item, usage, and charge $). In addition, this billing information includes the Provider's credit (top-up $). Provider's billing information can be viewed at any time by the Provider and is described in the Live Hub technical documentation. Live Hub does not store any payment or credit card details.

2 Right of Access (Art 15)

The Section 'Overview and Definitions' (above) fully outlines what data the Live Hub collects and saves as personal data.

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

- Providers with access to the Web interface or REST API can view and/or download their own CDRs, call transcripts, call recording, Provider information, Provider settings, and Provider billing information.

- Administrators with access to the Web interface or REST API can view and download CDRs, Syslog files, Provider information and Provider billing information.

Detailed information on how the Provider can retrieve the above can be found in the Live Hub technical documentation.

3 Right to Rectification (Art 16)

CDRs, call transcripts, call recording, and Syslog notifications are treated by Live Hub as 'read-only' information as soon as it's stored in the database/disk. Live Hub 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 Live Hub 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 2-year period. This allows AudioCodes to address any billing questions of the Provider during this period. Once this period elapses, the call information is deleted automatically. In case there is a need to immediately erase CDRs, the Live Hub Administrator can do so.

b) **Call Transcripts:**

Call transcript is stored for a 7-day period. 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. In case there is a need to immediately erase call transcript records, the Provider can do so by deleting the call transcript record using Live Hub's web interface.

c) **Call Recording:**

Call recording is stored for a 30-day period. This allows sufficient time for the Provider to use the call recording or download it. Once this period elapses, the call recording information is deleted automatically. In case there is a need to immediately erase call recording, the Provider can do so by deleting the call recording using Live Hub's web interface.

d) **Syslog Notifications:**

Syslog notification is stored for a 21-day period. This allows the AudioCodes Administrator to address any call history issues. Once this period elapses, the syslog information is deleted automatically. In case there is a need to immediately erase syslog records, the Live Hub Administrator can do so.

e) **Provider Information:**

Provider information retention period is the length of the service contract plus two (2) years. This allows AudioCodes can address any Provider questions also after the two years.

Explicit Deletion: A Provider can request to delete its' Live Hub account. This explicit deletion deletes call transcripts, call recordings and the Provider's settings. CDRs, Provider information and Provider billing information is kept for an additional two (2) years.

f) **Provider Setting:**

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

g) **Provider Billing Information:**

Provider billing information is stored for a 2-year period. This allows AudioCodes to address any Provider billing questions during this period. Once this period elapses, Provider billing information is deleted automatically.

5 Right to Data Portability (Art 20)

Personal data which is stored in Live Hub, 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 CSV file. The calls are saved to a CSV file according to the procedure defined by the Live Hub technical documentation.

The calls recorded in the CSV 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 CSV file. It is up to the Live Hub Provider to make sure that Tenant personal data is not exposed to the data subject. It is beyond the Live Hub product's scope to erase other personal data that is not related to the data subject's personal data from the CSV 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 Live Hub technical documentation. The call transcript file may contain Tenant personal data which is not related to the data subject. It is up to the Live Hub Provider to make sure that other personal data is not exposed to the data subject. It is beyond the Live Hub product's scope to erase other personal data that is not related to the data subject's personal data from the transcript file.

c) **Call Recording:**

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

d) **Syslog Information:**

Only the Live Hub Administrator can access and copy 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.

e) **Provider Information:**

Providers can view their own account information in the Live Hub through the Live Hub's web interface. The Provider page can then be saved as a text file or any other method such as a screen capture and alike.

f) **Provider Setting:**

Providers can view their own account setting information in the Live Hub through the Live Hub web interface (Bot, Numbers, SIP Connections). Provider settings can then be saved as a text file or any other method such as a screen capture and alike.

g) **Billing Information:**

Providers can view and download their own billing information in the Live Hub through the Live Hub's web interface Provider billing information can be download to a CSV file.

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 Live Hub portal information and settings. Access to personal data stored in the Live Hub is protected and requires a username and password to view and retrieve any personal data from the Live Hub.

a) **Live Hub Web Access:**

Access to the Live Hub's web interface is only performed by Providers and Administrators who have rights to log in to the Live Hub. Live Hub users are authenticated and authorized using a username and password.
Provider can access only the following information: Provider CDRs, Provider transcript, Provider recording, Provider information, Provider settings, and Provider billing information

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

b) **VoiceAI Connect Database Access:**

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

c) **Data in Transit:**

Live Hub implements encrypted communication for signaling, media and syslog information (secure SIP and SRTP) and uses HTTPS for bot-frameworks and cognitive services.

d) **Charges:**

AudioCodes has partnered with BlueSnap, a leading payment gateway for secure transactions. AudioCodes does not store any payment details.

7 End of Contract

The Provider can 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, call recording, and Provider settings.
- Provider CDR records, Provider information, Provider billing information is kept for two (2) more years to address Provider billing queries. Once this retention time elapses, all Provider information is deleted except for the Provider's email, account deletion date, account balance at time of deletion and plan used.

Detailed information on how to perform an end of contract (Delete Provider) is described in the Live Hub technical documentation.