GDPR Notice for AudioCodes Interaction Recording

Date Published: May 08, 2024 | Document #: LTRT-28977

AudioCodes Interaction Recording 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 Interaction Recording operation.

1 Overview and Definitions

Controller

A data controller is an entity or individual that determines the purposes and means of processing personal data. In other words, the data controller is the organization or person that decides why and how personal data should be processed. In this document, Controller is the **Customer**.

Processor

Processor is an individual or organization that processes personal data on behalf of a data controller. In this document the processor is **AudioCodes**.

GDPR defines 'personal data' as any information related to an identified or identifiable natural person. This person may be identified directly (e.g., name, ID number, etc.) or indirectly through any other identifier who is unique to this person ("Data Subject"). For Interaction Recording, individuals can be directly identified by name or indirectly identified through other identifiers such as phone numbers and email addresses.

Interaction Recording manages, collects, and stores the following information:

a) **Call recording**

Interaction Recording records and stores call-related information and call media that it receives from communication platforms such as Microsoft Teams.

b) **Microsoft Teams communication platform or a Session Border Controller (SBC)**

Call recordings may include the following information which may be used to identify a person:

- Caller name

AudioCodes Inc.
80 Kingsbridge Rd
Piscataway, NJ 08854, USA
Tel: +1-732-469-0880 Fax: +1-732-469-2298

International Headquarters
Naimi Park, 6 Ofra Haza, Or Yehuda, Israel
Tel: +972-3-976-4000
Fax: +972-3-976-4040

Contact
https://www.audiocodes.com/contact
Website
https://www.audiocodes.com

- Caller phone number
- Caller URI
- Callee name
- Callee phone number
- Callee URI
- Answered party name
- Answered party number
- Answered party URI
- Redirected by party name
- Redirected to party name
- Call media (audio, video, sharing)
- Call transcript (referred as part of call media below)
- Chat messages (referred as part of call media below)

c) **Users' Information**

Interaction Recording is configured to connect to Microsoft Azure Active Directory to retrieve users' information into the Interaction Recording database. This information is used in Interaction Recording 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::

- First and Last names
- Account name
- Email
- Azure User OID
- UPN

d) **Logs**

Interaction Recording log messages stored in Interaction Recording servers may contain call detail information such as caller, callee, answering party, redirected to/by party names, and phone numbers. Users being logged in will be masked to not be identified.

2 Right of Access (Art 15)

Article 15 of the General Data Protection Regulation (GDPR) grants individuals the right to access their personal data that is being processed by an organization.

The Interaction Recording administrator can access and look for the personal data upon request of a Data Subject. More information can be found in *Right to Data Portability (Art 20)*.

AudioCodes Inc.
80 Kingsbridge Rd
Piscataway, NJ 08854, USA
Tel: +1-732-469-0880 Fax: +1-732-469-2298

International Headquarters
Naimi Park, 6 Ofra Haza, Or Yehuda, Israel
Tel: +972-3-976-4000
Fax: +972-3-976-4040

Contact
https://www.audiocodes.com/contact
Website
https://www.audiocodes.com

3 Right to Rectification (Art 16)

Article 16 of the General Data Protection Regulation (GDPR) grants individuals the right to have inaccurate or incomplete personal data rectified by the organization that is processing their data

In the Interaction Recording system, the user information is controlled by Interaction Recording administrator. User information is mapped from Microsoft Azure Active Directory and it can be changed in the Customer's AAD but cannot be changed in Interaction Recording.

The Call information and media are processed and stored on-the-fly in the Interaction Recording database and in media storage respectively. This data cannot be changed in Interaction Recording once it is captured and stored as part of a normal operation.

4 Right to be Forgotten (Art 17)

Article 17 of the General Data Protection Regulation (GDPR) grants individuals the right to request the erasure of their personal data from an organization's systems under certain circumstances.

The information collected by the Interaction Recording as described in *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 Interaction Recording administrator can delete the call media. The Customer must sign a waiver with AudioCodes to enable deletion.

b) **Users' information**

The Interaction Recording administrator can delete a user defined in Interaction Recording by removing the mapping of the user from their AAD. The deleted user will be defined as an inactive user in Interaction Recording while it has recordings associated with it. After the user is unmapped from AAD and becomes inactive, the administrator can delete it from the Interaction Recording portal.

AudioCodes Inc.
80 Kingsbridge Rd
Piscataway, NJ 08854, USA
Tel: +1-732-469-0880 Fax: +1-732-469-2298

International Headquarters
Naimi Park, 6 Ofra Haza, Or Yehuda, Israel
Tel: +972-3-976-4000
Fax: +972-3-976-4040

Contact
https://www.audiocodes.com/contact
Website
https://www.audiocodes.com

5 Right to Data Portability (Art 20)

Article 20 of the General Data Protection Regulation (GDPR) grants individuals the right to receive a copy of their personal data in a structured, commonly used, and machine-readable format and to transmit this data to another organization

Personal data which is stored in the Interaction Recording as defined in *Overview and Definitions* may be retrieved by the Interaction Recording administrator and sent to a Data Subject.

a) **Call recording**

The Interaction Recording user with the correct permissions can export the call recording details to an excel file and the media to a media file. 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 Interaction Recording Customer's responsibility to make sure that other personal data except for the Data Subject's personal data is not exposed. Interaction Recording administrator can select which fields to expose using Configure Export File Columns options of the call recording export to excel file feature.

b) **Users' information**

Users' information in Interaction Recording can be retrieved. The Interaction Recording administrator can select a specific user to view the user details sourced from AAD - see *Overview and Definitions*. The user details can be exported to a file by the Interaction Recording administrator.

6 Responsibility of the Controller and Data Protection by Design and by Default (Art 28 and 25)

Under the General Data Protection Regulation (GDPR), data processors have specific responsibilities to ensure the protection of personal data. A data processor is defined as any organization or individual that processes personal data on behalf of a data controller.

a) Personal data will only be processed on the documented instructions of the Customer unless required by law.

b) AudioCodes ensures that the personnel involved in processing the data are bound by confidentiality obligations.

c) AudioCodes implements appropriate technical and organizational measures to ensure the security of the personal data it processes.

d) AudioCodes will notify the Customer without undue delay after becoming aware of a personal data breach.

AudioCodes Inc.
80 Kingsbridge Rd
Piscataway, NJ 08854, USA
Tel: +1-732-469-0880 Fax: +1-732-469-2298

International Headquarters
Naimi Park, 6 Ofra Haza, Or Yehuda, Israel
Tel: +972-3-976-4000
Fax: +972-3-976-4040

Contact
https://www.audiocodes.com/contact
Website
https://www.audiocodes.com

e) Assist the Customer in responding to data subject requests and complying with their obligations under GDPRs detailed above.

f) Assist the Customer in complying with their obligations in relation to data protection impact assessments and consulting with the supervisory authority.

7 Technical and Organizational Measures (Art 32)

Article 32 of the General Data Protection Regulation (GDPR) outlines the security requirements for personal data processing. Under this article, organizations that process personal data must implement appropriate technical and organizational measures to ensure the security of the data. organizational measures to ensure the security of the data.

Technical measures include:

Encryption

- Data Security at Rest: Interaction Recording data is securely stored in an encrypted form using disks or storage.
- Data Security in Transit: Interaction Recording data in transit is encrypted using secure protocols such as TLS and SRTP.

Data Separation

- Compute is shared.
- Data separated - DB entity per Customer, storage per Customer.

Organizational measures include:

- Implementing data protection policies
- Appointing a data protection officer
- Providing training for employees
- Vendor Management procedures to ensure that third-party service providers and suppliers also comply with GDPR requirements.
- Conducting regular audits to ensure compliance with GDPR.

More information can be found in the *Data Flow and Data Security* for Interaction Recording.

8 Addition Information

Detailed information about the Interaction Recording can be found in the *Interaction Recording Administrator's Guide*.

AudioCodes Inc.
80 Kingsbridge Rd
Piscataway, NJ 08854, USA
Tel: +1-732-469-0880 Fax: +1-732-469-2298

International Headquarters
Naimi Park, 6 Ofra Haza, Or Yehuda, Israel
Tel: +972-3-976-4000
Fax: +972-3-976-4040

Contact
https://www.audiocodes.com/contact
Website
https://www.audiocodes.com