

Processing of Personal Data

Whitepaper

Version 1.5

Purpose

The European Data Protection Regulation came into force on May 25th, 2018.

The GDPR not only applies to organizations located within the EU but also applies to organizations located outside of the EU if they offer goods or services to, or monitor the behavior of, EU data subjects. It applies to all companies processing and holding the personal data of data subjects residing in the European Union, regardless of the company's location.

The GDPR applies to 'personal data', meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organizations collect information about people. This document is intended to assist direct customers and partners in answering technical questions related to OpenScape UC and compliance with EU-GDPR requirements with regards to their employees' personal data when using OpenScape UC. It describes which customer personal data are being collected, processed and transferred by OpenScape UC and for what purpose these data are accessed.

This document describes the main functions of OpenScape UC. It makes no claim to completeness. For clarification of unaddressed topics or detailed questions, the user documentation of the used devices/clients and the OpenScape UC Administration Manual must be used. The documents can be downloaded within the Internet via the Unify Partner Portal.

<https://www.unify.com/us/partners/partner-portal.aspx> (Login is required)

The descriptions in this Whitepaper refer to OpenScape Xpressions V7R1 FR5
In the course of technical development, changes to this document may arise at any time.

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Table of content

1.	Introduction.....	4
1.1.	Fulfilment of EU-GDPR requirements	4
1.2.	Legacy products notice	4
2.	Processing of Personal Data.....	4
3.	Data Acquisition by the System Administrator (Master Data)	5
4.	Data Collection during Operation (Traffic/Trace/Log/Content Data)	6
4.1.	Data acquisition by the server	6
4.2.	Data acquisition by the user.....	6
4.3.	Data acquisition for diagnostic purposes.....	7
5.	Display of Personal Data on User applications (“Software Clients”).....	7
5.1.	Applications	8
6.	Transmission of Personal Data (Data on Move).....	8
7.	Recovery of Personal Data	8
8.	Personal Data Retention.....	9
9.	References and Sources	9
9.1.	OpenScape Xpressions Service-/Administrator documentation	9
9.2.	User Guides	9

1. Introduction

1.1. Fulfilment of EU-GDPR requirements

According to the GDPR, the operator (controller) determines which data are collected and where, how, by whom (processor) they are processed. Mirrored on OpenScape Xpressions this means:

The system administrator (processor) may only collect or release personal data and functions in the system configuration specified by the operator (controller). This applies in detail to data of telephone and Xpressions subscribers, address and contact data (telephone numbers, e-mail), contacts and directories, as well as to UC functions.

During operation, OpenScape Xpressions can generate and process further personal data. These include, but are not limited to: address books or journal data, messages, recordings. The applications and users of OpenScape Xpressions can also individually process further personal data in their applications.

The operator (controller) of OpenScape Xpressions must be informed by the system administrator (processor) about such generating and processing of personal data so that he can take these functions into account in the data protection concept.

OpenScape Xpressions offers many options for blocking or restricting the collection and processing of personal data. The detail data that can be captured and processed, as well as the limitations, are described in the following chapters of this document.

The operation of OpenScape Xpressions is not possible without the use of personal data.

1.2. Legacy products notice

Unify products have a long tradition of design for security and certainly our recommendations for personal data handling apply to some extent to our past product versions or solutions too. Nevertheless, enhancements addressing current market needs, GDPR included, are only provided on our latest solutions or product versions. Please consider upgrading your systems to assure up-to-date security and features to help you comply with GDPR requirements.

2. Processing of Personal Data

OpenScape Xpressions is a solution that offers a comprehensive unified messaging application.

OpenScape Xpressions uses personal data in addition to pure telephone numbers in order to offer users the desired scope of service on the telephones and Unified Communication User Applications.

The use of personal data is mandatory for the overall function of OpenScape Xpressions.

Personal data is collected by various tools and processes in the OpenScape Xpressions System or in the connected user applications and phone devices. Data is either stored in the system, in the user applications or phone devices. The collected data is used for the OpenScape Xpressions functions.

OpenScape Xpressions differentiates between data processing during system setup and configuration and data processing during operation in general.

During system configuration, personal data can only be collected and stored by an authorized system administrator.

During operation of OpenScape Xpressions, personal data can be captured and stored either by the base system or by the users in their telephone or user applications ("software clients", see chapter 5.1).

3. Data Acquisition by the System Administrator (Master Data)

The system administrator can record personal data manually using the Webassistant tool. It is also possible to import mass data with Webassistant or other administrative tools such as Infotool and/or DBtool. There are also other interfaces to populate/sync the personal user data such as ldap, WebCDC, text file import and EMSDK.

There are several personal data that can be configured but most of them are optional. The system administrator must keep the acquired information to the minimum required fields for each specific Xpressions installation/usage.

Data storage

The system uses a local storage (on premises) for storing the user data and it is split in two main components: users' voicemails and database. The users' voicemails/messages are represented either by a data file or by a file with proprietary structure that contains metadata beyond the data file itself that are made available by operational system folder share. The database uses a proprietary solution and is composed by multiple files. In the database component there are system information and also fields containing users' personal data.

Data Access / Data Use

The access of the user's personal data can be either by the system administrator for administrative purposes or by the user itself. By default, users do not have rights to access personal data except their own.

Data Export

The system allows to export the data by using administrative tools. Only system administrator can export user's personal data. The data exported is collected for all users. The system administrator can retrieve from the exported contents the information that is related to one user. Further processing from the system administrator is required in order to get the data presented in a readable format before delivering to the user.

Data Transmission

All the personal data transmission between the system and the user applications are encrypted in order to preserve the users' data confidentiality. The data transmission in a non-monolithic installation (kernel + satellites) are subject to specific configuration of user authentication. Encryption can be enabled by the system administrator. Data transmission uses different interfaces and protocols for that purpose. A detailed list of the protocols and security guidelines can be found in the product Security Checklist.

Backup / Restore

Regardless the reason, compliance with IT governance, regulatory requirements, data loss prevention or disaster recovery, the complete system can be backed up, including configuration and user data. The system administrator has to specify where to store this information and he is responsible to encrypt and control access to the backup files. Additional details about the backup procedure can be found in the OpenScape Xpressions Server Administration manual

Data Deletion

Personal Data can be deleted from the Admin of the UC system with manual actions: In more detail:

Master data: Any data may be deleted via Administrator's actions using the UI or API (SPML).

Trace data: Any data may be deleted via Administrator's actions using the UI or access to the file system.

Authentication data: Any data may be deleted via Administrator's actions using the UI or API (SPML).

Backup data: Backup data can be deleted via Administrator's actions using the UI or access to the file system.

Also, a max number of backups can be configured after which old backups are deleted.

The deletion of personal data from backups can be done via the following sequence of actions:

- Restore the backup, perform the delete action and then perform the backup again.

- Perform the delete action, create a new backup and delete any old backups.

Data Retention/Modification/Deletion

After user deletion, the system retains for a specific period of time its personal data until its complete deletion. Such time can be adjusted by the system administrator according to the customer needs: the retention period after deletion of personal data is specified by the DocumentLifeTime (more details can be found in the Xpressions server administration document). The retention default duration is sixty (60) days, but the system administrator can set it up from 3 to 9999 days.

All the user data are then excluded from the system. The system keeps records of any changes to the user personal data, including time, date and name of the person who performed such changes (regardless of whether the changes were done by the owner of the data or by the system administrator).

4. Data Collection during Operation (Traffic/Trace/Log/Content Data)

For personal data collection during operation, a distinction is made between the collections during operation by:

- Server
- User Applications
- Basic system and applications for diagnostic purposes

4.1. Data acquisition by the server

The OpenScope Xpressions keeps all messages (voicemail, fax, SMS and e-mail) and recordings of each user of the system. It is also possible to activate a call journal on a per user basis.

Data Storage

The message contents are represented either by a data file or by a file with proprietary structure that contains metadata beyond the data file itself. All the information related to that message, including originator and recipient information, timestamp and other properties of the message including the path to the content data file are stored in the database.

The call journal is also stored in the database and has information from the caller, called, call type (incoming/outgoing) and timestamp

Data Access/Data Use

Different applications can be used to access the message, recordings and call journal, including TUI scripts, mail software such as Outlook and Webassistant.

Data Export

The system administrator can use administrative tools to export the database data from the system that can include messages and journal information.

Data Transmission

The information is only used locally and can be replied or forwarded using user applications (see chapter 5.1). The access on the server will be controlled by the operating system.

Backup/Restore

Personal Data can be deleted from the Admin of the UC system with manual actions. Whether and how data backup can be performed and how data can be restored can be found in the OpenScope Xpressions Server Administration manual.

Data Retention/Modification/Deletion

The user can delete all of its messages, recordings and journal using user applications (see chapter 5.1) such as Webassistant. The system administrator will also be able to delete such personal data of any user.

4.2. Data acquisition by the user

OpenScope Xpressions has the opportunity to acquire and maintain individual data, which may also contain personal data of other persons.

The options depend on the usage of the system:

- Address book
- Messages
- Recordings

Data Storage

The data is stored locally, either in database files or local folders.

Data Access/Data Use

The user manual of the user applications (see chapter 5.1) contains all information on how to access the data stored on the server. The Webassistant software application is able to access all the information based on specific user role (e.g. normal user or administrator). Other user applications have a more restrictive access to the user personal data.

Data Export

Whether a data export is supported by the applications can be found in the Xpressions documentation.

Data Transmission

The information is only used locally and can be replied or forwarded using user applications (see chapter 5.1). The access on the server will be controlled by the operating system.

Backup/Restore

Whether and how data backup can be performed and how data can be restored can be found in the server administration manual. Third party mail softwares and its specificities can be consulted in their manual

4.3. Data acquisition for diagnostic purposes

OpenScope Xpressions provides diagnostic mechanisms that stores log and trace files in the system. These files may also contain personally identifiable information.

The acquisition of base trace and log data is active after factory commissioning.

The system administrator is able to use the MRS Monitor tool to change the detection depth of traces/logs as directed by the system development, as well as to activate or deactivate further traces/logs

Data Storage

The collected data is stored locally using the operational system file system and Operational System diagnose tools depending on the system administration configuration

Data Access/Data Use

Access to traces and logs is only possible to users that have access to the folder in which they are stored. Traces and logs are used for system diagnostics in the event of an error.

Data Export

The export of trace log files can only be done by users that have access to the server folder in which they are stored.

Data Transmission

Depending on the system configuration and customer needs, logs can be sent to an external application like OpenScope Voice Trace Manager -OSVTM using security protocols like SFTP or SNMPv3. All other trace/log data contain personal data and are stored unencrypted on the server on an operational system folder. The access will be controlled by the operating system.

Backup/Restore

A backup/restore of the trace and log files is not provided

5. Display of Personal Data on User applications ("Software Clients")

The personal data collected in OpenScope UC serves to support the user in his business processes. For this The personal data collected in OpenScope Xpressions support the user in his business processes. The data is displayed on various types of user applications of the OpenScope Xpressions System for the realization of its functions. Depending on the data and the functions, the visibility of the data can either be limited or completely prevented by configuration options offered to the system administrator or to the user.

Personal data can generally be displayed in the subsequent functions of the application.

- Address book
- Messages
- Recordings
- Journal

5.1. Applications

The personal data in Xpressions can be used by different applications, each one with its own purposes. Specificities will be described below.

5.1.1. Mail software (Outlook)

Information from the originator such as number and name can be shown in the received messages. Report forms configured by the system administrator can also be received detailing information from voice and fax messages.

5.1.2. Webassistant

There are several personal data that can be configured using Webassistant. Those are accessible only by administrators. Users can also use this tool to view/modify their own personal data. As a webmail, the information from the originator such as number and name can also be shown. Journal and address book can also be available depending on the configuration

5.1.3. TUI Scripts

The only personal data that can be used by Phonemail script and other TUI scrips are the name and number from the originator. With Vogue (IVR), the administrator can create call flows that accesses information from the database.

5.1.4. Communications

There are several personal data that can be configured using Communications. Those should be accessible only by administrators. They also can create fax stationaries which can disclosure the originator's personal data.

6. Transmission of Personal Data (Data on Move)

Person-related data is transmitted on the one hand between the OpenScape Xpressions System, the connected telephone devices and user applications and on the other hand as an option to external applications.

Further information on securing the transmission paths and the transmission protocols used etc. can be found in the OpenScape Xpressions Security Checklist. (see chapter 9)

Personal data can be transferred to identify a caller or an originator, to sync to another system such as directory services, inhouse products (UC, OSV) among others.

The communication security can be configured by the system administrator on each interface and protocol that transmits personal data.

The data transmission in a non-monolithic installation are subject to specific configuration of user authentication to isolate the communication between the system components.

7. Recovery of Personal Data

OpenScape Xpressions offers an integrated backup/restore function that allows Administrators to quickly restore the system configuration and the personal data contained in the event of an error. For this purpose, the personal data stored in the system configuration as well as a deduction of the system database can be stored in special backup files, saved and, if necessary, restored from these.

8. Personal Data Retention

The personal data acquired by the system administrator in OpenScape Xpressions can also be deleted by the system administrator. Personal data acquired by the user himself in the user applications (see chapter 5.1) e.g. address book, recordings, voicemails, SMSs and faxes can be selectively or completely deleted by users themselves.

The deletion of personal data always refers to the current system configuration. Personal data in system backups and archived files are not deleted. The system administrator has to specify where to store this information and he is responsible to encrypt and control access to them.

Personal data (e.g., surname, first name) associated with messages and journals of other users are retained after deleting the user in the other users' messages and journals. The personal data are retained as long as the user is mentioned in other users' messages and journals, and not deleted by those other users.

The system administrator can use the administration tool to delete data entered by the user in the Xpressions system and user data collected by the system during normal operation. Personal data held directly by user applications such as Outlook that stores information locally on user's workstation cannot be controlled or deleted by system administrator. Such user applications should have their own processes to deal with the processing of personal data. Refer to its corresponding documentation or provider for details about personal data handling specific for each application.

9. References and Sources

9.1. OpenScape Xpressions Service-/Administrator documentation

OpenScape Xpressions Server Administration, Administrator Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/134ec266-bca9-4800-99bb-38bb52460f3a>

OpenScape Xpressions Server Installation, Installation Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/9f6a6f95-0d5c-45da-a7da-fadacd1df564>

OpenScape Xpressions Release Notice, Service Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/ba7828d9-0852-40e2-9012-a33e1d029504>

OpenScape Xpressions Security Checklist, Service Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/a5b2096b-a3d3-4b5d-b01a-ec211ce4cedf>

OpenScape Xpressions V7, Lotus Notes Gateway, Administrator Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/748b1c05-8791-41ab-a72d-ac8430a0b8c0>

OpenScape Xpressions V7, Microsoft Exchange Gateway, Administrator Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/6cb490c0-ecf3-4ac0-8a81-ff4aabc58f5a>

OpenScape Xpressions V7, Multi Tenancy, Administrator Documentation

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/60ec97ba-8b1d-4219-a789-5bb1c7122b10>

9.2. User Guides

OpenScape Xpressions V7, Application Builder, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/79a6fff0-a053-46e7-8547-d04fc64bc2e9>

OpenScape Xpressions V7, Client Applications, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/38fa30c3-570c-4bfd-b86e-5e85bff512a0>

OpenScape Xpressions V7, Lotus Notes Extensions, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/d696a151-8ae1-4044-8397-8b1a5019633d>

OpenScape Xpressions V7, Microsoft Outlook Extensions, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/5b62dcad-82a7-4ae8-ac13-95364bd2c974>

OpenScape Xpressions V7, PhoneMail, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/e72dbc19-4c8c-4358-bbaf-0e88cc75e1d1>

OpenScape Xpressions V7, Web Assistant, User Guide

<https://nuxeo.unify.com/nuxeo/site/proxy/nxdoc/view/raw/2a690bb4-cee6-4441-8fbb-669d8b339cb9>

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