

OpenScape Xpert V7

Whitepaper
Processing of Personal Data

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 Whitepaper is intended to assist customers and partners in answering questions with respect to the EU-GDPR with regard to their employees' personal data when using Atos Unify OpenScape Xpert. It describes which personal data may be collected, processed and transferred by OpenScape Xpert, where they are stored and provides important information on how companies and organizations can reach GDPR compliance when using OpenScape Xpert.

The descriptions in this Whitepaper refer to OpenScape Xpert. Associated applications like voice recorders are not covered by this document. In the course of technical development, changes to this document may arise at any time.

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1. Introduction

1.1. Fulfilment of EU-GDPR requirements

The EU-GDPR itself does not contain any product related requirements. Therefore, a specific product itself is not impacted as such by the GDPR requirements.

However, this document is intended to give an overview on how the OpenScape Xpert together with the available official product documentation can support customers, partners and operators of a communication solution in complying with the GDPR. This applies to processes, organizational measures and product features as well, when talking about technological protection, access control and encryption.

The GDPR defines two roles: the data controller and the data processor. The operator (data controller) determines which data are collected and where, how, by whom (data processor) they are processed.

The system administrator (data processor) may only collect or release personal data and functions in the system configuration as specified by the operator (data controller).

During installation, operation and maintenance, OpenScape Xpert can generate and process further data. These include but are not limited to call data records (CDR), caller lists or journal data, log and trace files. The OpenScape Xpert Client users can also individually process further personal data in their telephone devices and clients, like speed dialing destinations and/or personal directories / contacts.

Since the OpenScape Xpert offers great functionality and a huge flexibility to configure the system in order to provide the required functionality and to fit best to the business needs and processes of the company or organization, it is assumed, that both persons (data controller and data processor) bring appropriate OpenScape Xpert know-how and can also prove, to set up and operate the system/solution according to the requirements of the GDPR and to achieve the best level of functionality, security, integrity and confidentiality.

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 Xpert is a communications solution that offers a comprehensive multiline voice communication system.

OpenScape Xpert uses personal data in addition to pure telephone numbers in order to offer users the desired scope of service on OpenScape Xpert Clients.

The use of personal data is optional but not mandatory for the overall function of OpenScape Xpert. If no personal data is used, functions such as dialing from phonebook or caller identification are not possible.

Personal data is collected by various tools and processes in the OpenScape Xpert System or in the connected clients and phone devices. Data is either stored in the system or in the client or phone devices. The collected data is used for the OpenScape Xpert functions.

OpenScape Xpert 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.

Consent

The company that uses the Xpert system can request Consent from the users in a paper-form, electronic form etc. The company can maintain a record with the collected consents. Withdrawal of consent is equivalent to user deletion. Withdrawal can be requested from the admin of the system via a paper form, e-mail etc.

3. Data Acquisition by the System Administrator

Via the OpenScape Xpert Management Portal (OSXMP) the system administrator can record personal data. The system administrator can either populate data manually or can import mass data from other sources into the directories.

Via the OSXMP following configuration data can be configured:

OSXMP Administrators

- Username

Profile

- Profile Name (*Profiles are typically bound to a user, therefore by lot of customers the user profiles are named after the name of the user or some other ID that identifies the user.*)
- Profile Password
- Contacts Password
- Call Memory Password
- Local Contacts
 - o Contact name
 - o Phone number
 - o Field 3: Custom text field that can be used to hold any textual data about the contact
 - o Field 4: Custom text field that can be used to hold any textual data about the contact
- Speed Dial Keys
 - o Contact name
 - o Phone number

Global contacts

- Contact name
- Phone number
- Field 3: Custom text field that can be used to hold any textual data about the contact
- Field 4: Custom text field that can be used to hold any textual data about the contact

Lines

- Name
- URI
- Username
- Password
- Display Name
- Alternate text
- Preferred Identity Number

Data storage

This system wide configuration data is stored in the internal database of the OpenScape Xpert.

Profile password is stored in the DB as salted hash.

Data Access / Data Use

Profile data are used to authenticate and authorize an OSX Client user. The list of available profiles is visible for all OSX Clients

Username and password data is being used for login purposes and for authenticated access of the Contacts and the Call Memory on the Clients.

Lines are used by the MLC to register to the PBX, Display Name, and Alternate Text is visible by the OSX Client users.

Contact data is used for caller identification, speed dial and phonebook function on the OSX Clients.

Data Export / Synchronization

System administrator has the possibility to export and import

- Global and Local Contact Data
- DKM Speed Dial buttons
- Line data

Data Transmission

During operation of the OpenScape Xpert, some of the mentioned personal data (e.g. Username, Number, Password) are being exchanged with the connected devices and clients in order to provide the desired functionality, e.g. to authenticate a user during login, to display the name of a caller or to provide access to call journal data, etc.

OpenScape Xpert uses the proprietary secure HTEMS protocol for data transfer between the Components.

Backup / Restore

The personal data of the system wide configuration are part of the OpenScape Xpert Backup. Backups can be created from the OSXMP or via command line interface. This file is either written on the System Manager hard disk or to a shared folder. The database can be restored from the backup if required.

Data Retention / Modification / Deletion

The personal data entered in the system wide configuration by the system administrator is retained until the system administrator changes or deletes the data via the administration tools.

Global contacts can be modified, but not deleted by OSX Client user if the “Global Contacts Changeable” parameter is enabled in the system settings.

OSX Client user can modify and delete private contacts and speed dial keys and the user can delete call journal entries.

4. Data Collection during Operation

During operation the OpenScape Xpert collects data which include personal data.

This affects the following services / components:

- Call Journals
- Call Data Record (CDR)
- Logging

4.1. Call Memory

The OpenScape Xpert system can collect call journal entries for each user if the feature is enabled in the OSXMP. Each incoming and outgoing call is recorded, and the following data are stored for each entry:

- Phone number
- Caller and Called Party Name
- Date / time
- Direction: incoming / outgoing
- Info: answered / unanswered
- Answered by: local / remote

The system administrator can influence the collection and behavior:

- Collect call memory data for that user profile
- Switch on or off the possibility for the user to delete the entries in the call memory
- Protect the display of call memory on the OSX Client with a password.

The log is created as FIFO (first in first out), i.e. when the maximum possible number of entries has been reached and the next one arrives, the oldest entry is deleted.

4.2. Collection of Call Data Records

The OpenScape Xpert CTI interface is responsible for recording, outputting, and processing call data for the other communication services e.g. for voice recorders.

Beside some other technical data, the following data can be collected:

- Profile Name
- Attendant Group
- Called party number
- Calling party number
- Call duration
- Call Type (local / remote)
- Call direction
- Timestamps: Start and end of connection

All this is optional and configurable.

Data storage

The call memory data is stored in the internal database of OpenScape Xpert System Manager. Logs are stored on the local hard disk.

Data Access / Data Use

Call memory is used to store historical information about user call activity. The data cannot be access by the system administrator. Only the OSX Client user can access the call memory data.

Data Export / Synchronization

Call memory data for one user profile can only include 100 entries. Export can be done by making screenshots or photos of the call memory list.

Data Transmission

During operation, OpenScape Xpert transfers the call memory data recorded to the OSX System Managers. OpenScape Xpert uses the proprietary Secure HTEMS protocol for data transfer between the components.

Backup / Restore

Same backup / restore concept as described in chapter 3.

Data Retention / Modification / Deletion

The OSX Client user can access the call memory data and delete call memory entries one by one.

The system administrator can delete the whole user profile, in this way the call memory data is deleted.

The system administrator can also use the master password to log in to the profile and delete call memory entries.

4.3. Logging Management

Logging is a part of the OpenScape Xpert. The purpose is to log major errors and mainly the administration activities in an OpenScape Xpert system.

Using Logging you can:

- View all activities on the components
- View all errors from an application

The information recorded for System Manager Event in Windows Event Viewer includes:

- User account
- IP address of the user
- Computer name
- Date and time of the event in the absolute time in the related system
- Different levels, event types and other properties of log data

5. Display of Personal Data on the Telephone Devices and Clients

The personal data collected in OpenScape Xpert serves to support the user in his business processes. For this purpose, the data is displayed on the telephone devices/clients of the OpenScape Xpert System for the realization of certain functions. Depending on the data and the functions, the visibility of the data can either be limited or completely prevented by the system administrator or by the user himself.

Personal data can generally be displayed in the subsequent functions of the telephone devices or the clients.

- Contact list
- Call memory
- Speed Dial Key (DKA, DKM)
- Call Queue
- Speech Units
- Concentrator keys
- Line Keys
- Speech Monitor Panels

6. Transmission of Personal Data (Data on Move)

Person-related data is transmitted on the one hand between the OpenScape Xpert System and the connected clients 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 Xpert Security Checklist.

6.1. Transmission between Clients and System

Personal data can be transferred to implement the OpenScape Xpert functions between the System Manager, the MLC and the OSX Clients. Here, the caller identification, the search in the telephone book or data directories of the system as well as the telephone status or presence status of a user is to be seen as a priority.

The transmission of personal data between the devices and system can be encrypted using IPSec.

6.2. Transmission to external Applications

Personal data can also be transferred to an external application for further processing. The data is transmitted either online via a system interface or offline via a file interface.

External application can connect to the OSX Client over the CTI or API interface in both cases the name and phone number of the remote party of the ongoing calls are sent to an external application. These interfaces can be disabled by the system administrator on the OSX Management Portal.

MLC can send complete calls (voice) to an external voice recorder. The call data is typically stored by the external component. This can be disabled by the system administrator on the OSX Management Portal.

6.2.1. Online transmission

Data that can be transferred online include:

- Call status
- Phone status for display in Xpert solution
- Caller identification

6.2.2. Offline transmission

The data that can be transferred offline include

- Backup files
- Contacts in export files

7. Recovery of Personal Data

OpenScape Xpert offers an integrated backup/restore function that allows 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

8.1. System in general

The personal data acquired by the system administrator in OpenScape Xpert can also be deleted by the system administrator. Personal data acquired by the user himself in the OSX Clients e.g. contact data or call memory, can be deleted by users themselves.

The deletion of personal data always refers to the current system configuration or to the current client configuration as well as to the current personal directories and journals. Personal data in system backups and archived files are not deleted.

Personal data (e.g. name) associated with the call memory of other users during OpenScape Xpert operation are retained after deleting the user in the other users' call memory.

The system administrator can use the administration tool to delete the data entered by the user/user himself in the system and the data collected by the system during operation for the participant. Excluded from this is the call memory. If necessary, these data must be deleted by direct access to the user's profile.

8.2. Call Memory

The call memory can be deleted after login into the user's profile on an OSX Client user interface. The system administrator can log into any profile with the Master password if necessary. Master password should be disabled by default on the system and should be enabled only when necessary.

Call memory entries can only be deleted if the modification is enabled for that user profile. This can be done by the system administrator on the OSX Management Portal.

9. References and Sources

All the documents mentioned above can be downloaded via E-Doku (Unify Intranet) or the Unify Partner Portal.

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

Within the Unify Partner Portal the documents can be accessed using the path:
Sell □ Products & Services A-Z □ OpenScape Xpert □ Documents

The EU-GDPR can be read in detail here:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>

Further information can be found on the web pages of the EU:

https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en

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Let's start a discussion together



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