

Unify OpenScape 4000

Processing of Personal Data

Whitepaper

Version 1.0

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 4000 and Atos Unify OpenScape 4000 Manager. It describes which personal data may be collected, processed and transferred by OpenScape 4000, where they are stored and provides important information on how companies and organizations can reach GDPR compliance when using OpenScape 4000.

The descriptions in this Whitepaper refer to OpenScape 4000 / OpenScape 4000 Manager. Devices, Clients and associated applications like OpenScape UC, Contact Center, etc. 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 4000 including the Assistant/OpenScape 4000 Manager 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 4000 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. Additionally, telephone devices and clients connected to an OpenScape 4000 may also locally process and store further personal data, like call journals and/or personal directories / phonebooks.

Since the OpenScape 4000 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 4000 and OpenScape 4000 Manager 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

The OpenScape 4000 is the convergent IP communication platform for companies with 300 to 100.000 employees. As a powerful and highly available communications solution, it offers a rich set of endpoints, mobility choices, branch office solutions, unified communications and standards-based integration and interoperability with business-critical applications and systems.

OpenScape 4000 may use personal data in addition to the pure telephone number in order to offer users the needed functionality to support their business needs and processes best.

The use of personal data is optional but not mandatory for the overall function of OpenScape 4000. If no personal data are being used, functions such as dialing from phonebook or caller identification are not possible.

Depending on the applications and services being used, personal data are configured and stored in various places in the OpenScape 4000 ecosystem.

Additionally, telephone devices and clients connected to an OpenScape 4000 may also locally process and store further personal data.

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

3.1. Atos Unify OpenScape 4000 system

Via the OpenScape 4000 Expert Access or the OpenScape 4000 Assistant/Manager the following subscriber related configuration data can be configured:

- First Name, Surname
- Name to be shown in phone display
- Organizational unit
- Station number
- PINs
- IP address for IP Phones
- Password for IP LOGON procedure for IP Phones

To operate and use the OpenScape 4000 system, the assignment of a telephone number plus PIN is sufficient. All other data can be added as an option in order to support the required functionality and business processes of the operator and must be documented in an operational or individual agreement with the persons concerned/data subjects.

Data storage

This basic configuration data is stored in the internal database of the OpenScape 4000, so either on the Unify proprietary server HW, e.g. EcoServer or on the Virtual Machine where the OpenScape 4000 system is running.

Data Access / Data Use

Some data are being used for login purposes.

Additionally, this configuration data is being used for caller identification (to display the name instead of the phone number on connected phones & clients) and also driving some functionality like class of service switch over.

Data Export / Synchronization

The content of the OpenScape 4000 internal database can be exported into a text file via the command line interface. (AMO Regen). This file is either written on the OpenScape 4000 hard disk or displayed at the operating terminal.

This internal database synchronizes with the OpenScape 4000 Assistant/Manager database. See chapter 3.2.

Data Transmission

During operation of the OpenScape 4000, some of the mentioned personal data (e.g. Name, Number, PIN) are being exchanged with the connected devices and clients and also the Attendant Console AC-Win or Cordless Base Station 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.

Different subscriber interfaces and protocols are being used depending on the device/client.

This is either SIP for the OpenScape Xpert, OpenStage WL3 or other 3rd party SIP devices or the Unify proprietary CorNet protocol for all "system phones" and clients, either connected via TDM/Upoe (optiPoint, OpenStage) or IP/HFA (optiPoint, OpenStage, Desk Phone IP, Desk Phone CP).

Furthermore name/number are being transferred via the trunking interfaces (CorNet NQ, QSIG, SIP, SIP-Q) to other OpenScape 4000, OpenScape Voice, OpenScape Business or 3rd party systems and within a distributed OpenScape 4000 architecture from the host system to the connected branch sites (OpenScape Access, OpenScape 4000 Branch, Enterprise Gateway) connected via IP.

Backup / Restore

A bootable Recovery hard disk including the LINUX operating system and the complete OpenScape 4000 appliance software can be created via the Administration Portal of the OpenScape 4000. This hard disk can be used to quickly restore the system in case of a failure.

To reduce the risk of a system outage and data loss, it is recommended to run the OpenScape 4000 in Duplex Mode.

Data Retention / Modification / Deletion

All this configuration / personal data are retained until the system administrator changes or deletes the data via the mentioned tools. There is no mechanism to automatically delete these data.

Potential backups need to be considered as well.

3.2. Atos Unify OpenScape 4000 Assistant/Manager

The OpenScape 4000 Assistant provides basic administration, configuration and diagnostic tools for a single OpenScape 4000. It is shipped with every new system and is integrated into the OpenScape 4000. No external server is required.

The OpenScape 4000 Manager provides management functionality for OpenScape 4000 networks. The OpenScape 4000 Manager is running on a separate server HW or virtualized on a Virtual Machine.

When using the OpenScape 4000 Assistant/Manager, some more data can be configured optionally in the Configuration Management, like:

- Name, First Name
- Address
- Title
- User Group
- Tenant Group
- Email Address
- Organization unit
- Country, Company, Location, Building, Room, Organization
- Station number
- Fax number
- External station number
- Info text
- Voicemailbox ID with PIN
- Delegate
- Customer specific fields
- Free Info text
- Identity Number
- Cost Center, Charge Group
- Bank Code, Account Number
- Group Phonebook for Cordless subscribers

Details can be found in the documents:

"OpenScape 4000 Manager V10, Configuration Management, Administrator Documentation" and *"OpenScape 4000 Manager V10, Feature Description"*

See chapter 0.

Data storage

Data entered via the OpenScape 4000 Assistant and Manger are being stored in separate / own databases, located on the server where the application is running.

Data Access / Data Use

Some data are being used for login purposes.

Additionally, this configuration data is being used for caller identification (to display the name instead of the phone number on connected phones & clients) and also driving some functionality like class of service switch over.

Other data like building or room are being used for information / inventory purposes or to support an accurate billing of toll data (cost center or charge group) within Accounting Management or as basis for system/network optimization via the Performance Management application.

Data Export / Synchronization

The OpenScape 4000 Assistant/Manager synchronizes its database with each single OpenScape 4000 system. When using the optional OpenScape Deployment Service (DLS) IP address and phone number are synchronized between both systems.

The OpenScape 4000 Assistant/Manager database can be accessed via a webservice interface, called "Import/Export (XIE) API". This is being used by various applications and services, like the DS-Win and iDTB or OpenScape UC. This interface needs to be activated and is disabled by default. See below.

A detailed description of this interface can be found in this document:
"OpenScape 4000 Manager V10, Import/Export (XIE) API, Service Documentation"
See chapter 0.

Data Transmission

OpenScape 4000 Assistant is running on the same server as the OpenScape 4000.
The interface between OpenScape 4000 and OpenScape 4000 Manager is an encrypted IP connection.

Backup / Restore

"Backup & Restore" as a component of OpenScape 4000 Assistant/Manager saves configuration data or software from RTOS and Linux applications to a backup copy file and restores the data upon request. "Backup & Restore" thus ensures that an accurate backup copy of the data and/or software will be available in the event of a system failure.

Backups can be either started manually or automatically according to a predefined schedule.

A detailed description of the functionality can be found in this document:
"OpenScape 4000 Assistant/Manager V10, Backup and Restore, Administrator Documentation"
See chapter 0.

Data Retention / Modification / Deletion

All this configuration / personal data are retained until the system administrator changes or deletes the data via the mentioned tools. There is no mechanism to automatically delete these data.
Potential backups need to be considered as well.

3.3. Integrated DTB (Display Telephone Book)

The iDTB is an OpenScape 4000 integrated Phonebook application with an own database. This database does not add additional data to the basic OpenScape 4000 data mentioned in chapter 3.1 and 3.2, but synchronizes with the Assistant or Manager database.

The integrated DTB is disabled by default.

Data storage

The iDTB database is stored on the same server where the OpenScape 4000 is running.

Data Access / Data Use

This data is being used to provide central phonebook access for the connected system phones and clients. Additionally, the iDTB provides enhanced Call Log functionality to these devices which goes beyond the functionality of the OpenScape 4000 based Call Log.

Data Export / Synchronization

The iDTB database can be synchronized internally with the Assistant or Manager database or with a database on an external SFTP server.

The database which consists of several files can be exported into a combined zip file.

Data Transmission

This data is being exchanged with the connected system phones (TDM or HFA) and clients in order to provide the phonebook or enhanced Call Log access.

Backup / Restore

The iDTB data is integrated into the OpenScape 4000 Assistant/Manager backup process.

Data Retention / Modification / Deletion

The personal data are retained until the system administrator changes or deletes the data via the administration tools. There is no mechanism to automatically delete these data.

Potential backups need to be considered as well.

3.4. Attendant Console AC-Win SL, incl. DS-Win and BLF-Win

AC-Win is the Attendant Console application for the OpenScape 4000. The attendant is able to program Speed Dials / Name Keys with a telephone number and a label (name) allowing establishing calls to these targets with a simple mouse click.

The "Notepad" functionality can be used to note and retrieve previously noted telephone numbers. If configured/allowed in the OpenScape 4000 system the attendant is able to record voice calls, either by manually clicking the call recording button or automatically when picking up a call.

The optional BLF-Win is an application supporting the attendant in providing status information about subscribers and subscriber groups, like: "Idle", "Ringing", "Busy", "Out of service", "Does not exist". The user/attendant can toggle to either show station numbers or names.

The optional DS-Win application is an electronic telephone directory for the Attendant Console and can be integrated seamlessly into AC-Win. DS-Win can, however, also be used at a PC without the AC Win application. The database of DS Win is individually configurable. It provides tables with data such as "employee name", "room number", "department", "email address", "product catalogue", "keyword list", etc. Apart from that the system administrator has also the option to add new fields and even to create new tables.

Data storage

AC Win data objects and the wave-files of the call recording are stored locally on the AC-Win PC. The BLF Win server is either integrated into the OpenScape 4000 ecosystem and running on the same platform (iBLF) or can be installed on a dedicated Windows PC. The BLF-Win client is installed on the same PC as the AC-Win application.

DS-Win is installed on the same PC as the AC-Win application and supports various databases. MySQL, Informix or PostgreSQL e.g. can either be installed locally on the PC or an already existing database server can be used/linked.

Data Access / Data Use

The AC-Win application displays the name / number of the calling / called subscriber in the call control area, Call Log, Directory view and Notepad.

Data Export / Synchronization

The DS-Win database can be exported into a text file and it can be synchronized with host databases, e.g., with the central OpenScape 4000 Manager database via XIE interface, either manually or automatically, according to a predefined timetable.

Data Transmission

The AC Win is connected via the standard OpenScape 4000 IP subscriber interface with CorNet IP / HFA protocol.

OpenScape 4000 Assistant is running on the same server as the OpenScape 4000.

The interface between OpenScape 4000 and OpenScape 4000 Manager is an encrypted IP connection.

Backup / Restore

Backup / Restore of the PC applications and its databases have to be considered within the standard concepts for the PC the applications are running on.

BLF Server part is integrated into the OpenScape 4000 Assistant/Manager backup process.

Data Retention / Modification / Deletion

The personal data are retained until the system administrator changes or deletes the data via the administration tools. There is no mechanism to automatically delete this data.

Potential backups need to be considered as well.

3.5. OpenScape Cordless E

The OpenScape Cordless Enterprise system is an integral part of the OpenScape 4000. Cordless subscribers are configured in the OpenScape 4000 in the same manner as analogue, TDM or IP subscribers.

Additional data being processed for cordless users:

- Cordless PIN
- Telephone directory (Phone book) data
- IPUI (International Portable User Identity, i.e. unique identification of every DECT mobile device)

Data storage

All subscriber data are saved in the OpenScape 4000 and OpenScape 4000 Assistant/Manager. Cordless installations are configured with an additional administration tool which runs on a standard Windows PC: CATool, which has its own database with statistic data and configuration data of installed boards and cordless subscribers.

Data Access / Data Use

Cordless subscriber data is being used for the same purpose as for all other subscribers, see chapter 0.

Data Export / Synchronization

The CATool database on the Windows PC needs to be synchronized with the OpenScape 4000 database via OpenScape 4000 Expert Access.

Data Transmission

Subscriber data like name/number and the Phonebook are exchanged via DECT (device <-> Base Station) and TDM/Upoe (Base Station <-> OpenScape 4000) with CorNet protocol. Configuration data is being exchanged between CATool and the OpenScape 4000 via OpenScape 4000 Expert Access.

Backup / Restore

Backup / Restore of the CATool and its database has to be considered within the standard concepts for the PC the application is running on.

Data Retention / Modification / Deletion

The personal data are retained until the system administrator changes or deletes the data via the administration tools. There is no mechanism to automatically delete these data. Potential backups need to be considered as well.

4. Data Collection during Operation

During operation the OpenScape 4000 collects and processes connection-related / traffic data which include personal data.

This affects the following services / components:

- Call Journals for subscribers
- Collection of Call Data Records (CDR)
- Performance Management
- Logging and Tracing

4.1. Call Journals / Call Logs

There are two technical implementations on how OpenScape 4000 connected devices are enabled to present Call Journal data.

The first one is driven by the OpenScape 4000 system, where call journals are collected in the system for each user.

Each incoming and outgoing call is recorded. A maximum of 10 outgoing and 20 incoming calls per subscriber will be stored.

The following data are stored for each entry:

- Phone number
- Name (if available)
- Date / time
- Direction: incoming / outgoing
- Info: free / busy / call

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.

The call log feature can be blocked or released individually for each subscriber.

This method is being used for all optiset and optiPoint Phones, for OpenStage 15-40 TDM/HFA, Desk Phone IP 35G / 35G Eco and Desk Phone CP200/205.

All other phones connected to OpenScape 4000, like Cordless devices, Unify and 3rd party SIP Phones and the OpenStage 60/80 TDM/HFA, Desk Phone IP 55G and Desk Phone CP400/600/600E generate their own call journals which are stored locally in the phone based on messages they receive from the OpenScape 4000 via the interfaces mentioned in chapter 3.1.

4.2. Collection of Call Data Records / Collecting Agent

The OpenScape 4000 internal call detail recording is responsible for recording, outputting, and processing charge and call data for the purpose of determining costs and billing them for certain communication services. This refers to outgoing (trunk, tie) and incoming external connections as well as to internal connections.

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

- ACD Agent ID
- Attendant Group
- Called party number
- Calling party number
- Call charge units
- Call duration
- Connection type
- Cost of the call
- Timestamps: Start and end of connection
- Originating and terminating IP Address of a call
- Ring duration

All this is optional and configurable.

A detailed description of the functionality can be found in this document:

"OpenScape 4000 V10, Volume 3: Feature Usage Examples, Service Documentation"

See chapter 0.

Data storage

Each OpenScape systems stores calls detail records on the local hard disk.

OpenScape 4000 Assistant/Manager Collecting Agent polls the call tickets from OpenScape 4000 switches via File Transfer and separates the call tickets to one file for AM (Accounting Management) and another file for PM (Performance Management).

Data Access / Data Use

Output of CDR data in OpenScape 4000

- Individual call data output on telephone display
- Call data display per connection at the Attendant Console
- Call data display at the Night Station
- Immediate call data output to external devices
 - Admin terminal
 - Two files on OpenScape 4000 hard disk for later processing
 - File on hard disk for later file transfer
 - On-line data transfer to an external server
- Call data output without analysis to external server on request
- Call data output in a file on request

Data Export / Synchronization

The OpenScape 4000 can either continuously send these data to another server or provide the data via a file. The Collecting Agent (COL) is a component of the OpenScape 4000 Assistant/Manager and gathers call data records (CDRs) from OpenScape 4000 systems in the network for Accounting Management (AM) and Performance Management (PM), analyzes individual call charge records and can be configured so that these records are combined with and extended by the personal/organizational data in Configuration Management, mentioned in chapter 3.1 and 3.2.

The resulting individual connection data is available as an ASCII file (unformatted) and can thus be evaluated by any application that supports a file interface (for example OpenScape AM).

Data Transmission

OpenScape 4000 Assistant is running on the same server as the OpenScape 4000.

The interface between OpenScape 4000 and OpenScape 4000 Manager is an encrypted IP connection.

Backup / Restore

Same backup / restore concept as described in chapter 3.1 and 3.2.

Data Retention / Modification / Deletion

Individual call data records cannot be changed or deleted, only the associated personal configuration data. Complete CDR files are retained until the system administrator changes or deletes the data via the administration tools.

In an OpenScape 4000 system the CDR data are temporarily stored in a call detail data pool in the Switching Unit so that there is no loss of call detail data if there is failure of an output device for example. However, the size of this memory and the size of the FT file are limited. When these limits are reached, no more call detail data can be stored and call detail data will be lost.

Potential backups need to be considered as well.

4.3. Performance Management

Performance Management (PM) is a WEB based application providing statistics on the traffic load of lines and trunk groups based on the evaluation of call data records (CDRs), and analyses results regarding the call activity of subscribers/stations, hunt groups, attendant consoles and attendant console groups. The application needs to be installed via the OpenScape 4000 "Application Administration".

The following measuring objects can be selected:

- Systems
- Trunk Groups
- Groups of Trunk Groups
- Lines
- Extensions
- Subscriber calls
- Hunt Groups
- Attendant consoles
- Cordless E
- Feature utilization
- OpenScape 4000 load

A detailed description can be found in this document:
"OpenScape 4000 Manager V10, Feature Description"
See chapter 0.

Data storage

Basis for the Performance Management are the call data records (CDRs) gathered via the OpenScape 4000 Assistant/Manager Collecting Agent. So data are stored either on the OpenScape 4000 server or the server where the OpenScape 4000 Manager is running on.

Data Access / Data Use

Performance Management reports are being used to optimize the configuration and system solution design of a communication system and/or network.

Data Export / Synchronization

Generated Performance Management reports can be exported as predefined graphs or in Excel, PDF, HTML or CSV format.

Data Transmission

OpenScape 4000 Assistant is running on the same server as the OpenScape 4000.
The interface between OpenScape 4000 and OpenScape 4000 Manager is an encrypted IP connection.

Backup / Restore

Same backup / restore concept as described in chapter 3.1 and 3.2.

Data Retention / Modification / Deletion

Data can be deleted manually. A data retention period can be configured, e.g. daily, one week, two weeks, etc. Potential backups need to be considered as well.

4.4. Logging Management

Logging Management is a part of the OpenScape 4000 Assistant / Manager. The purpose is to log major errors and mainly the administration activities in an OpenScape 4000 system.

OpenScape 4000 applications use Logging Management to log error, activity events, and logbook entries.

Using Logging Management, you can:

- View all activities on a switch
- View all activities on all switches on a particular day
- View all errors from an application
- View all logbook entries
- Download logbook backup files (OpenScape 4000 Assistant only)
- The error log records problems that occur on the OpenScape 4000 platform. It does not record switch problems.

The information recorded for events in the logs includes:

- User account
- IP address of the user
- Switch 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

4.5. Tracing

The OpenScape 4000 and the integrated applications provide diagnostic mechanisms that store log and trace files in the system. These files may also contain personally identifiable information.

After the first installation all trace options are disabled.

Data Storage

The collected data is stored on the mass data storage of the system where the application is running, e.g. on the EcoServer (for OpenScape 4000) or dedicated server (for OpenScape 4000 Manager).

Data Access / Data Use

Access to traces and logs is only possible for the system administrator or the system development. 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 the system administrator or by the system development via the administration access of the system.

Backup / Restore

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

5. Principles relating to processing of personal data

Finally, some additional topics need to be mentioned to allow the data controller and data processor to secure personal data and protect access to that personal data.

The protection against physical and logical access to the administration access of the OpenScape 4000 (Expert Access, Assistant/Manager) and all other applications and services mentioned in this document must be realized on site by the operator of the system.

OpenScape 4000 Access Management controls which users are allowed to access a specific server, and which applications and access rights these users may use. For those users, Access Management creates user accounts, manages their passwords, password attributes and other account-related data, and controls their access via a web browser. Five different Security Levels are provided.

Starting and ending sessions, invalid logon attempts, creation and deletion of rights, modifying security settings and even each individual AMO usage (command line interface) are being logged.

Alarms can be generated to immediately inform the responsible people about the attempt to get access to the system so that the processor is able to determine immediately whether a personal data protection breach has taken place.

To ensure an appropriate security level, all interfaces should be encrypted in general. The admin-interfaces via https, voice data via SRTP and the signaling of the voice data via TLS.

The service and administration manuals of the OpenScape 4000 and above all the most recent version of the security checklist of the OpenScape 4000 system and the Manager and if necessary, additionally those for other products included in the solution (like OpenScape UC or devices) as well, serve as support. When setting up/operating the solution, the data processor needs to make sure that all the measures described in this checklist have been implemented.

Those checklists describe in detail how the products can be operated in a secure mode, how to harden the server and operating system, how to configure the firewall and how to implement appropriate password policies.

Details can be found in the documents:

OpenScape 4000 V10, Affiliated Products, Security Checklist

OpenScape 4000 Manager V10, Security Checklist

See chapter 0.

And finally, manual or automatic/periodical backups of configuration data and software are possible as described in the chapters above and need to be considered by the data controller/processor to ensure protection against accidental loss or damage of data.

6. 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 4000 V10 → Documents and

Sell → Products & Services A-Z → OpenScape 4000 Manager V10 → 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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