Privacy Factsheet

Avaya Communications APIs

(Document version 2.1, January 2023)

DISCLAIMER – the processing of personal data by Avaya Communications APIs does not mean (by default) that Avaya (and/or its sub-processors) may have access to such data. Access control and use cases depend on the specific configuration/customization of Avaya Communications APIs. This document is an overview of personal data essential processing activities within Avaya Communications APIs, including, but not limiting to, privacy by design built-in tools and controls made available to protect personal data being processed within Avaya Communications APIs.

1. General Description of Avaya Communications APIs

Avaya Communications APIs enables businesses to integrate communications capabilities quickly and easily like voice, video, and messaging into their own applications without needing to build backend infrastructure and interfaces. It can used as a development platform and/or as a platform to deliver custom Software-as-a-Service applications.

Solutions can be personalized and set up in only a few days by leveraging APIs that can be deployed on top of any existing communications infrastructure which is already in place.

Avaya Communications APIs has the following core features:

- Enable access to SIP Trunking for PSTN telephony services (see Service Description for more information);
- Provide a full Application Programming Interface (API) platform for developers to create applications that can integrate with existing systems/services (see Service Description for more information);
- Support third-party SIP Trunking integration *("BYOC")* with the same capabilities as with Avaya SIP Trunking (see Service Description for more information).

For offer information on our communication APIs, please visit our website.

2. Processing of Personal Data within Avaya Communications APIs

The table below provides overview of personal data categories processed within Avaya Communications APIs.

No.	Personal Data Category	General Description and Purpose	Personal Data Examples	Storage Location
1.	*"Account Holder Identifiers"*	Account Holder Identifiers are bits of information that uniquely identify an account on the system	Email, address phone number, E911 address, employee ID, etc.	Google Cloud Platform
2.	*"Account Identity"*	Account Identity data is required by each telco provider to obtain and access numbers	Account Identity data can be, but is not limited to ID card, passport, copy of utility bill, etc.	ServiceNow
3.	*"CDR"*	Call detail records of inbound and outbound voice calls and metadata associated with a call	Contains time, duration, completion status, source number, destination number, etc.	Google Cloud Platform
4.	*"E911 Addresses"*	Information associated to a number to be sent to upstream carrier when dialing 911 or 112	User address information.	Google Cloud Platform
5.	*"Logs"*	Avaya Communications APIs may generate application-level logs that contain personal data. These logs are securely transmitted to the log destination and stored encrypted. Application logs are used to troubleshoot problems and ensure Avaya Communications APIs	Application logs may contain customer's identifiers used in sessions, engagements and transcripts.	Datadog

		functionality and performance		
6.	*"Lookups"*	Data kept for caching purposes	CNAM, BNA, Caller ID	Google Cloud Platform
7.	*"Call Recordings"*	The call recording is consolidated into a transcript using Avaya Communications APIs for customer's consumption	Full call recording transcription	Google Cloud Platform and Amazon Web Services
8.	*"Traffic"*	Inbound and outbound	The call signaling traffic, API calls, call logs, SMS/MMS (including source, destination and content) and usage history	Google Cloud Platform and Amazon Web Services

Note: the location of datacenters is based on the geographical location where the Avaya Communications APIs Customer is based. For further reference please see the tables below:

Datacenter Location (ServiceNow)	**Provides Avaya Communications APIs services to Customers in…**
United States of America	Worldwide

Datacenter Location (Amazon Web Services)	**Provides Avaya Communications APIs services to Customers in…**
United Stated of America	USA, Canada, Puerto Rico

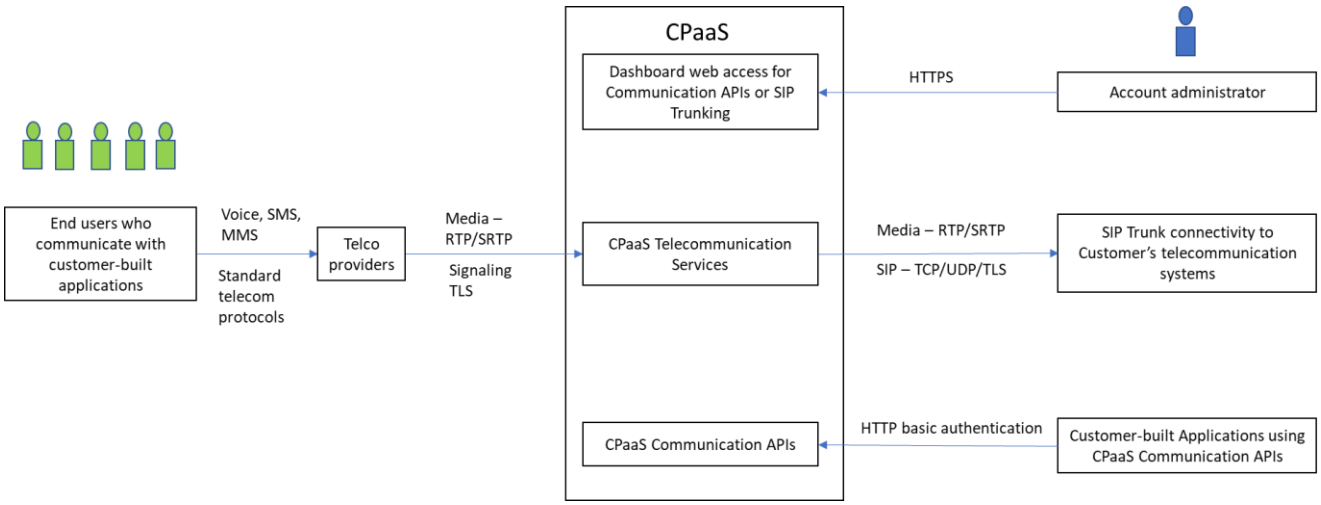
Datacenter Location (Google Cloud Platform)	**Provides Avaya Communications APIs services to Customers in…**

United Stated of America	USA, Canada, Puerto Rico
Germany	UK, Ireland, France, Netherlands, Portugal, Belgium, Italy
Singapore	Singapore, Australia
Brazil	Brazil

Datacenter Location (Datadog)	Provides Avaya Communications APIs services to Customers in…
United States of America	Worldwide

3. Security Overview within Avaya Communications APIs

The visual diagram below identifies the interfaces in which authorized users and external applications communicate with Avaya Communications APIs. The sub-sections following this chart provide more details of the control measures used by Avaya Communications APIs to safeguard Avaya Communications APIs Customer's data.



Encryption Controls

- All personal data at rest uses RDS encrypted by default and is stored on Amazon's S3 cloud. It uses AES 256-bit encryption.

- Confidential data such as passwords and secrets at rest is additionally encrypted using envelope encryption that employs a combination of AES 256-bit encryption and 2048-bit RSA asymmetric encryption.

- All data in transit over external and internal interfaces is secured using TLS protocol (version 1.2+). This applies to common protocols like HTTPS, WSS, POP3, IMAP and SMTP.

- Services consumed by dialing from the PSTN, Avaya Communications APIs can offer TLS encryption, however it is depending on the primary carrier and Avaya cannot guarantee end-to-end encryption of the voice / signaling path across all global server provider networks.

- Voice media encryption using RTP and SRTP with DTLS .

- X509 certificates issued by well-known Public CAs secure Avaya Communications APIs's REST APIs, external interfaces and storage resources hosted by the cloud service provider.

Security Controls

- Edge security to protect Avaya Communications APIs external interfaces from DDoS attacks, bots, and other malware.

- Web application firewall with OWASP and managed rules sets to protect against existing and new web vulnerabilities.

- All storage services are inaccessible from the external network. Restrictive network access control policies further limit access between applications and storage services.

4. Personal Data Human (Manual) Access Controls

- Avaya Communications APIs leverages industry best practices to host and manage its resources. Access to these resources is restricted to a small number of Avaya cloud operations engineers. Our processes are designed to achieve security and compliance certifications.

- Avaya will not access Avaya Communications APIs Customer's content data without permission from Avaya Communications APIs Customer and only for the purposes set out in the underlying customer agreement.

- Access control measures in place include integration with Avaya MFA, when configured, for account holder authentication.

    - The Account Holder has access to the Avaya Communications APIs web-based dashboard containing access to CDRs, the account's SMS messages, platform notifications, recordings, transcriptions and usage history.

5. Personal Data Programmatic (API) Access Controls

- Avaya Communications APIs uses REST APIs to exchange data with its web-based portals and other authorized external applications. Avaya Communications APIs provides access to account data using a combination of Account ID and token pair to access account data using the API.

- Please refer to the Avaya Communications APIs developer website to learn more about Avaya Communications APIs.

6. Personal Data Retention Period Controls

The table below provides personal data retention periods within Avaya Communications APIs.

No.	Personal Data Category	Default Retention Period*
1.	*Account Holder Identifiers*	Per subscription term
2.	*Account Identity*	Until the account is active on Avaya Communications APIs platform or needed for regulatory purposes, whichever is longer
3.	*CDR*	18 months
4.	*E911 Addresses*	Per subscription term
5.	*Logs*	30 days
6.	*Lookups*	30 days
7.	*Call Recordings*	30 days
8.	*Traffic*	30 days

** The Account Holder can reach out to Avaya Communications APIs support team at Avaya by creating a service request via Avaya OneCare portal to request the change of the default retention period.*

7. Personal Data Export Controls and Procedures

Account holders can download .csv files of traffic data and/or data generated from API requests from the Avaya Communications APIs dashboard.

Account holders can also create a request to Avaya via *Avaya OneCare portal* if additional exports are needed.

8. Personal Data View, Modify, Delete Controls and Procedures

- Account holders have (view and/or modify) access to personal data described in Section 2. Access control for these users is implemented through measures set out in Sections 4 and 5.

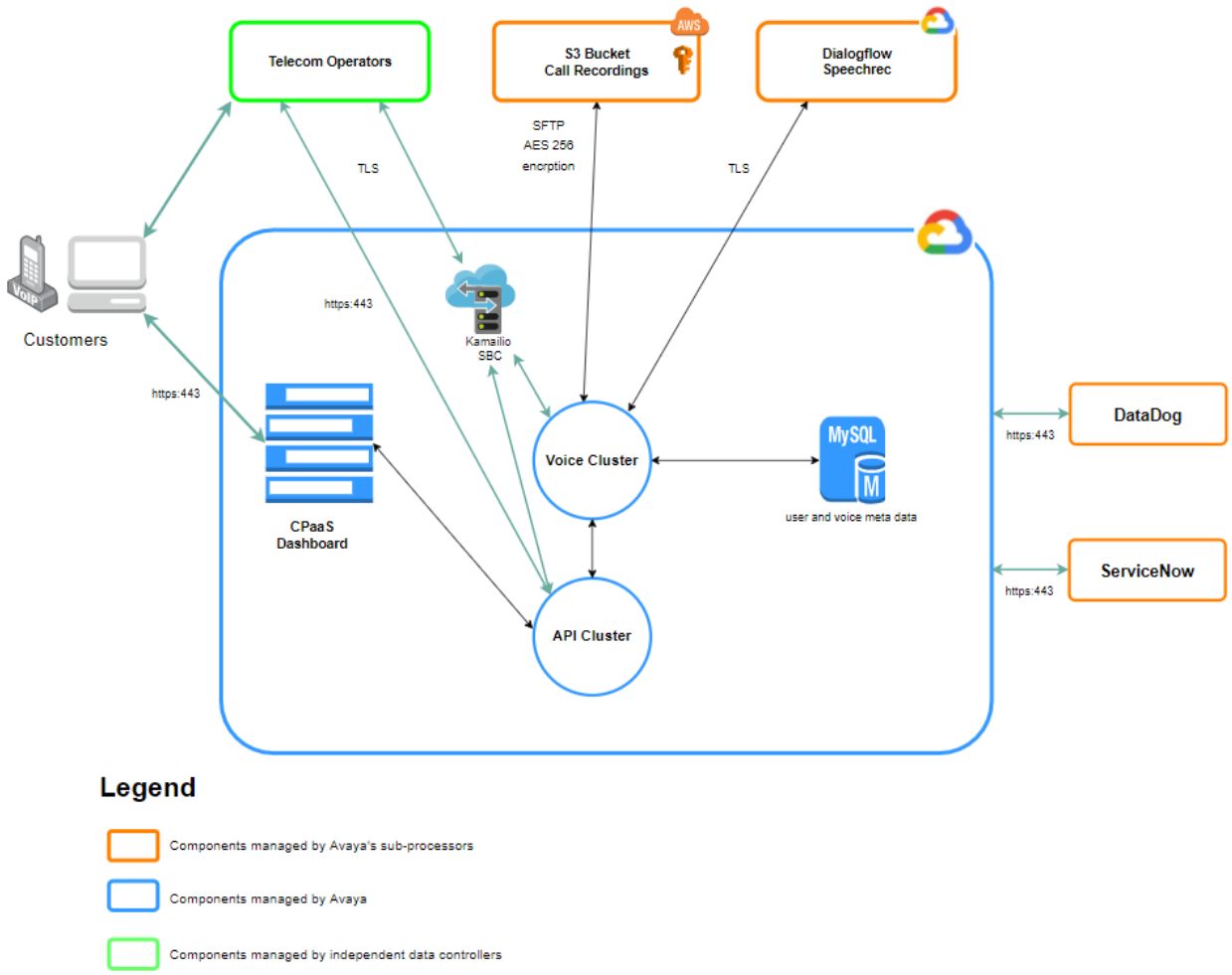
- The account holder can create a service request via *Avaya OneCare portal* to delete personal data within Logs, Call Recordings, and Usage Metrics.

a. The request must contain one or more identifiers of the data subject whose personal data needs to be deleted.

b. Depending on the category of personal data, it will be either deleted or anonymized. Call Recordings, Messages and Logs are deleted/purged. End-User Identifiers and personal data within Engagements and metrics collected in analytics application are anonymized.

9. Avaya Communications APIs Components and Data Flow

The visual below provides a high-level overview of the data flows in Avaya Communications APIs.



Avaya Communications APIs Components managed by Avaya:

- *Avaya Communications APIs Dashboard:* Customers can connect to the Avaya Communications APIs dashboard through a web browser and navigate to add funds, purchase numbers and access APIs;

- *Voice Cluster*: SIP media server that facilitates IVR and API functionality for all traffic (calls, SMS, MMS);

- *API Cluster*: Rest API services and functional microservices housing all business logic and recordings;

- *SBC Cluster (Kamailio)*: Session border control (SBC) layer is the interface for calls into Avaya Communications APIs;

The table below provides a list of Avaya's third-party sub-processors that process personal data within Avaya Communications APIs. Section 2 above sets out where the personal data is hosted.

No.	Full Legal Name	Country of Incorporation	Service Description
1.	Alphabet Inc. (Google Cloud Platform)	United States of America	Cloud platform hosting Avaya Communications APIs and traffic usage analytics service
2.	Amazon Web Services, Inc.	United States of America	Call and conference recordings, call and SMS logs
3.	Datadog Inc.	United States of America	Cloud Monitoring as a Service ("MaaS")
4.	ServiceNow, Inc.	United States of America	Cloud digital workflow and enterprise operations

10. Usage Metering

Avaya Communications APIs Customers are billed for the numbers used for calling, messaging and services such as recording and transcription. The quantity of the services consumed depend on the application created using Avaya Communications APIs. Usage Data contains data such as the user's ID (generated by Avaya Communications APIs when the user's account is created), login time, logout time. Avaya will process such data for billing purposes.

11. Definitions

No.	Term	Description
1.	Account Holder	An Administrator uses Avaya Communications APIs web-based portal to manage accounts, order number, download data and access APIs.
2.	CNAM	Caller Name Delivery
3.	BNA	Backbone Network Architecture
4.	Avaya Communications APIs Dashboard	Web-based application for account holder to manage number and services.
5.	AES	Advanced Encryption Standard is a symmetric block cipher used to encrypt sensitive data.
6.	DDoS	Distributed Denial of Service is a malicious attempt to disable a service's normal operation.

7.	DTLS	Datagram Transport Layer Security is a communications protocol that provides security for datagram-based applications by allowing them to communicate in a way that is designed to prevent eavesdropping, tampering, or message forgery.
8.	E911	A system used to provide the caller's location to PSAP dispatchers.
9.	HTTPS	Hypertext Transfer Protocol Secure used for secure communication over a computer network.
10.	IMAP	Internet Message Access Protocol (IMAP) is a protocol used by email clients to retrieve email messages from a mail server.
11.	MFA	Multi Factor Authentication is an authentication process that requires the user to provide two or more verification factors.
12.	MMS	Multimedia messaging service
13.	OWASP	Open Web Application Security Project is an online community that produces freely available articles, methodologies, documentation, tools, and technologies in the field of web application security.
14.	POP3	Post Office Protocol 3 is a protocol used by email clients to retrieve email messages from a mail server.
15.	Public CA	Public Certificate Authority is a well-known and trusted organization that issues digital certificates.
16.	RDS	RDS encryption uses the industry standard AES-256 encryption algorithm to encrypt your data on the server that hosts your Amazon RDS instance
17.	REST API	A REST API is an application programming interface (API) confirming to RESTful architecture style.
18.	RSA	Rivest, Shamir, and Adleman (RSA) is a public-key cryptosystem that is widely used for secure data transmission.
19.	SIP	The Session Initiation Protocol (SIP) is a signaling protocol used for initiating, maintaining, and terminating real-time voice calls in CCaaS.
20.	SMS	Short message service
21.	SMTP	Simple Mail Transfer Protocol is a standard protocol for sending emails.
22.	SRTP	Secure Real-time Transport Protocol is a profile for Real-time Transport Protocol intended to provide encryption, message authentication and integrity, and replay attack protection.

23.	TLS	Transport Layer Security is a cryptographic protocol designed to provide communications security over a computer network.
24.	X509	X509 is a standard defining the format of public key certificates.
25.	WSS	WebSocket Secure is a computer communications protocol designed over the HTTP protocol, to provide full duplex communication channels.

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