

Privacy Data Sheet

Lumen® Solutions for Microsoft Teams

This Privacy Data Sheet describes the processing of personal data by Voice and Unified Communications' service Lumen® Solutions for Microsoft Teams ("the "Service").

Lumen® Solutions for Microsoft Teams is provided by Lumen to its customers ("Customers") for use by Customer and Customer's end users (each an "End User"). Lumen may process personal data Customers provide regarding Customer and Customer's End Users in the course of providing the Service.

Types of End User personal data

End User personal data may include (Lumen does not link this information to an individual unless Customer purchases Microsoft Tenant Management or requests End User trouble-shooting):

- IPv4 and IPv6 addresses (source/destination)
- MAC addresses
- Device logs
- Domain names
- Operating systems
- Netflow data such as port ID, and packet sizes
- File information (file name, last modification, permissions, size and type)
- Presence status
- User names, titles, and Active Directory information
- User settings, including location
- DDI/DID (direct dial in/direct inward dialing)
- SIP URI (session initiation protocol uniform resource identifier)/email address

Purpose of processing

Necessary to provide services, trouble-shoot, comprehend Customer's needs, optimize service, and provide Customer reports

Authorized personnel with access (and reasons)

- **Lumen:** Troubleshoot and support service
- **Customer** (through Customer's Microsoft 365 tenant, and Unify2 PowerSuite): Troubleshoot and support service
- **SIP Communications, Ltd.** (through Customer's Microsoft 365 tenant, if purchased by Customer): Troubleshoot and administer service
- **Software suppliers** (if product purchased, e.g., analytics, contact center or associated applications for service usage, adoption, and service): Initial configuration, troubleshooting and support service
- **Hardware suppliers** (no direct access to personal data – access only via screenshare session if Lumen opens a trouble ticket with vendor): Troubleshoot and support service

Retention periods

- Lumen does not retain End User personal data in the normal course of providing this Service
- Personal data provided by Customers to allow Lumen to handle trouble tickets may be retained by Lumen for up to 7 years

Transfers of personal data across borders

Data remains within region; however, Lumen uses Standard Contractual Clauses to transfer personal data outside the European Economic Area to countries that have not received a determination of adequacy from the European Commission.

Locations where personal data is processed and stored


Organizations with authorized access to personal data	Storage location	Access location
Lumen Customer	<u>Asia</u> Singapore	Lumen, Customer, and all Sub-Processors: Authorized personnel located anywhere with secure internet access
Resonate	<u>Europe</u> France UK	Lumen: APAC, EMEA, North America
SIP Communications, Ltd.	<u>North America</u> USA	Resonate: UK, Greece, Netherlands, Slovakia
Unify Square (sub-processor to SIP Communications, Ltd.)		SIP Communications, Ltd.: UK and US
WorkStreampeople B.V. (sub-processor to SIP Communications, Ltd.)		Unify Square: Australia, Germany, Ireland, Netherlands, Switzerland, UK, US
		WorkStreampeople B.V.: Belgium, Canada, The Netherlands, UK, US

Lumen and its sub-processors use Microsoft Azure as their cloud service provider for storing data associated with providing Services. Microsoft Azure data is stored within region as described in the [Microsoft Trust Center](#).

Sub-processors used (third party suppliers)

Lumen may share personal data described in this Privacy Data Sheet with Lumen affiliates and suppliers.

Lumen uses the following third-party suppliers who also process personal data to provide the Service to Customers and their End Users.

Third-party vendors	Country	Supplier' privacy statement
Resonate-UCC Holdings Ltd	UK, Greece, Netherlands, Slovakia	 Resonate GDPR readiness statement
SIP Communications, Ltd.	France, United Kingdom, US	SIP Communications, Ltd. Privacy Policy
Unify Square	Australia, Germany, Ireland, Netherlands, Switzerland, United Kingdom, United States	Unify Square Privacy Policy
WorkStreampeople B.V.	Netherlands	https://anywhere365.io/wspstorage/2020/05/Anywhere365-WebAgent-Privacy-Policy.pdf