

# Lumen Voice Direct

Privacy Data Sheet

November 2024

This Privacy Data Sheet describes the Processing of Personal Information by Lumen Voice Direct (the "Service"). Lumen Voice Direct wraps voice, infrastructure, and SIP trunking into a bundled subscription offering. As part of the Service, Customers may choose to connect Lumen Voice Direct with any of the resold UC&C solutions that Lumen is currently reselling such as Zoom®, Microsoft®, and Cisco Webex® cloud services collaboration services, to its Customers for use by Customer and Customer's End Users (each an "End User"). Lumen provides Voice Direct directly for use by Customer and Customer's End Users. Lumen may Process Personal Information Customers provide regarding Customer and End Users in the course of providing the Service.

## Types of End User Personal Information

End User Personal Information may include: (Lumen does not link this information to an individual unless Customer purchases Microsoft Tenant Management or requests End User troubleshooting):

- IPv4 and IPv6 addresses (source/destination)
- MAC addresses
- Device information
- Device interface information
- Device logs
- Call Detail Records (containing phone numbers)
- Text records (SMS/MMS)
- Domain names
- Operating systems
- Usage information
- Account information (including name, address, email and phone numbers)
- Subscription plan information (capacity, calling plan type, add-on features, etc.)
- Billing data (such as losing carrier details, pin, account phone number, and other items covered in a Letter of Agency)
- NetFlow data such as Port ID and packet sizes
- File information (file name, last modification, permissions, size and type)
- Email addresses and names of meeting hosts

## Purpose of processing

Necessary to provide services, troubleshoot, comprehend Customer's needs, optimize service, and provide Customer's reports

## Authorized Personnel with Access

- **Lumen:** To troubleshoot. Implement and support service through the Lumen Control Center and Cloud Calling Service Manager
- **Customer:** Through the Cloud Calling Service Manager and relevant UC&C Portal with access limited to only that Customer's End User information
- **UC&C Partners:** Access to partners administrative portal with access limited to only that Customer's End User information

## Retention Periods

### Lumen:

- Rolling ninety (90) days for monitored data. Data overwritten for monitored data
- Data deleted within ten (10) days of notice upon termination of the contract for monitored data and logs
- IP address deleted after Customer terminates contract

## Service and Applications

Customer may access the Service through certain applications hosted by Lumen to provision and order the Service.

## Lumen Control Center

Portal activity information. If you have placed information in Control Center, we collect information about your interaction with Lumen including monitoring, recording, and analyzing your activity on the site and any changes to your Business Customer Account(s) you are authorized to manage, inquiries you submit, feedback, and similar commercial activity information.

## Cloud Calling Service Manager

In addition to basic order information that is collected during the provisioning process for Lumen Voice Direct, Lumen also collects the following information when Customers order or port their telephone numbers to the Service:

- Service location/company/site address
- Order type (new telephone numbers, new toll-free numbers, bring your own numbers - aka ported telephone numbers)
- CNAM or caller ID
- Calling Plan Subscription Type
- Directory Listing Publishing Information including subscribers name and service address

## Transfer of Personal Information Across Borders

Lumen uses Standard Contractual Clauses to transfer Personal Information outside the European Economic Area to countries that have not received an adequacy determination from the European Commission.

## Locations where Personal Information is Processed and Stored

<b>Organizations with authorized access to Customer Information</b>	<b>Storage location per Customer's instructions</b>	<b>Access location</b>
Lumen	<b>North America</b> USA (Colorado, Virginia)	<b>North America:</b> USA (Arizona, Colorado, Minnesota, Washington, DC)  <b>or</b> <b>Global:</b> Authorized Personnel located anywhere with secure internet access
Customer	<b>North America</b> USA (Colorado, Virginia)	<b>North America:</b> USA (Arizona, Colorado, Minnesota, Washington, DC)  <b>or</b> <b>Global:</b> Authorized Personnel located anywhere with secure internet access

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

## Sub-processors (third party suppliers)

Lumen may copy Personal Information described in this Privacy Data Sheet to Lumen supplier for the purposes of setting up and/or delivering the Service. Lumen uses the following third-party suppliers who may Process Personal Information to provide the Service to Customers and their End-Users.

	<b>Third-party Suppliers and Purposes</b>	<b>Country</b>	<b>Supplier's privacy statement</b>
	Zoom	USA	<a href="#">Zoom Privacy Statement</a>
	Cisco	USA	<a href="#">Cisco Privacy Statement</a>
	Microsoft	USA	<a href="#">Microsoft Privacy Statement</a>