

# Privacy Data Sheet

## Managed UC&C Cloud Services

This Privacy Data Sheet describes the processing of personal data by Lumen Managed Unified Communications and Collaboration (UC&C) Cloud Services (“the “Service”).

Managed UC&C Cloud Services are 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:

- IPv4 and IPv6 addresses (source/destination)
- MAC addresses
- Device information
- Device interface information
- 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)
- CLI (command line interface)
- SIP URI (session initiation protocol uniform resource identifier)/email address

### Purpose of processing

Necessary to provide services, 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 UC&C platform tenant, and Unify2 PowerSuite): Troubleshoot and support service
- **SIP Communications, Ltd** (through Customer’s UC&C platform 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

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> Hong Kong Singapore	<b>Lumen, Customer, and all Sub-Processors:</b> Authorized personnel located anywhere with secure internet access
Resonate SIP Communications, Ltd	<u>Europe</u> France UK	<b>Lumen:</b> APAC, EMEA, North America <b>Resonate:</b> UK, Greece, Netherlands, Slovakia
Unify Square (sub-processor to SIP Communications, Ltd.) WorkStreampeople V.C. (sub-processor to SIP Communications, Ltd.)	<u>North America</u> New York State, USA Washington State, USA	<b>SIP Communications, Ltd.:</b> UK and US <b>Unify Square:</b> Australia, Germany, Ireland, Netherlands, Switzerland, UK, US <b>WorkStreampeople B.V:</b> Belgium, Canada, The Netherlands, UK, US

## 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, and Microsoft Azure cloud locations in any of the following countries: Australia, Brazil, Canada, China, France, Germany, Hong Kong, India, Ireland, Japan, Korea (North & South), Netherlands, Norway, Singapore, South Africa, Switzerland, UAE, UK, US	 Resonate GDPR readiness statement
SIP Communications, Ltd.	France, United Kingdom, US	<a href="#">SIP Communications, Ltd. Privacy Policy</a>
Unify Square	Australia, Germany, Ireland, Netherlands, Switzerland, United Kingdom, United States	<a href="#">Unify Square Privacy Policy</a>
WorkStreampeople B.V.	Netherlands	<a href="https://anywhere365.io/wspstorage/20/05/Anywhere365-WebAgent-Privacy-Policy.pdf">https://anywhere365.io/wspstorage/20/05/Anywhere365-WebAgent-Privacy-Policy.pdf</a>