MiVoice MX-ONE – Personal Data Protection and Privacy Controls

MiVoice MX-ONE Release 7.8

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1 Introduction

1.1 Overview

This document is one in a series of product-specific documents that discuss the product security controls and features available on Mitel products.

This document will be of interest to Mitel MiVoice MX-ONE customers that are putting security processes and security controls in place to comply with data security regulations.

This document is intended to assist Mitel MiVoice MX-ONE customers with their data security regulations compliance initiatives by:

- Identifying the types of personal data that are processed by MiVoice MX-ONE
- Listing the MiVoice MX-ONE Security Features that customers may require to achieve compliance with data security regulations
- Providing a description of the MiVoice MX-ONE Security Features
- Providing information about where the MiVoice MX-ONE Security Features are documented

This document is not intended to be a comprehensive product-specific security guideline. For information about product security guidelines, product engineering guidelines or technical papers, refer to Mitel's Web Site.

1.2 Reference Documents

Following internal documents have been referenced within this document and can be found in the MX-ONE O&M Library:

- SECURITY DESCRIPTION, Doc ID: 19/1551-ASP 113 01.
- SECURITY GUIDELINES, Doc ID: 9/154 31-ASP 113 01.
- PROVISIONING MANAGER DESCRIPTION, Doc ID: 15/1551-ANF 90115.
- SERVICE NODE MANAGER DESCRIPTION, Doc ID: 16/1551-ANF 90115.
- CALL INFORMATION AND QOS LOGGING Operational Description, Doc ID: 20/154 31-ANF 901 14.

Following Mitel public web sites are referenced within this document:

- Mitel's Product Security Policy(<u>https://www.mitel.com/support/security-</u> advisories/mitel-product-security-policy)
- Mitel Product Security Publications(<u>https://www.mitel.com/support/security-advisories</u>)

Following external documents are referenced within this document and can be found at these web sites:

- General Data Protection Regulation (GDPR) (<u>https://eur-lex.europa.eu/eli/reg/2016/679/oj</u>)
- EU Data Protection Directive 95/46/EC (<u>https://eur-</u> lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A31995L0046)

1.3 What is New in this Release

In MX-ONE 7.8 there are no new or changed security features.

2 Personal Data Collected by MiVoice MX-ONE

MiVoice MX-ONE is made available as both on-premises and hosted offerings. Both offerings process only personal data that is required for the delivery of communication services including call control, billing services, and technical support services. There are no end-user opt-in consent mechanisms implemented in MiVoice MX-ONE.

Note: The MiVoice MX-ONE does not collect or store any sensitive personal data.

During the course of installation, provisioning, operation, and/or maintenance, MiVoice MX-ONE collects data related to several types of users, including:

- End-users of MiVoice MX-ONE typically Mitel customer employees using Mitel phones.
- Customers of Mitel customers for example, voicemail recordings might contain personal content of both parties in a call; end-user personal contact lists may contain personal data of their business contacts.
- System administrators and technical support personnel logs and audit trails contain records of the activities of system administrators and technical support personnel.

To summarize what the General Data Protection Regulation (GDPR) means for a technical system like MiVoice MX-ONE, it is to:

- Be able to protect personal data from unauthorized readers, or from being manipulated by unauthorized users.
- Be able to extract personal data for review.
- Be able to erase personal data, on request.

3 Personal Data Processed by MiVoice MX-ONE

MiVoice MX-ONE processes the following types of data to enable its communications features:

- Provisioning Data:
- The end-user's name, business extension phone number, mobile phone number, location, department, and email address.
- Maintenance, Administration, and Technical Support Activity Records:
- o System and content backups, logs, and audit trails.
- End-User Activity Records:
- Call history and call detail records.
- End-User Personal Content:
- Voice mail recordings and personal contact lists.

4 Personal Data Transferred by MiVoice MX-ONE

Depending on the customer's configuration, and specific use requirements, the personal data collected may be processed and/or transferred between the MiVoice MX-ONE and other related systems and applications (such as directory systems, voice mail systems, and billing systems.)

For example:

- User provisioning data such as the user's first name, last name, office phone number, and mobile phone number may be configured to be shared between clustered MiVoice MX-ONE systems, Mitel MiCollab, and management systems such as the Mitel Performance Analytics system.
- Voice quality logs, phone inventory, user name, and phone number may be configured to be read by the Mitel Performance Analytics system and other customer-authorized systems.
- System logs, login and logout audit logs for the desktop tool, voice quality logs, customer databases, call detail records (also known as CDR or SMDR), and voice quality statistics may be configured to be transferred to Mitel product support or transferred to customer-authorized log collecting systems.
- Call Detail Records may be configured to be transferred to third-party call accounting systems.
- When MiVoice MX-ONE is part of a Hospitality solution (hotel/motel) the system may be configured to transfer the end-user's personal data between the MiVoice MX-ONE system and other customer-authorized Property Management Systems.

5 How the Security Features Relate to Data Security Regulations

MiVoice MX-ONE provides security-related features that allow customers to secure user data and telecommunications data and to prevent unauthorized access to the user's data.

Table 1 summaries the security features Mitel customers can use when implementing both customer policy and technical and organizational measures that the customer may require to achieve compliance with data security regulations.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
System and Data Protection, Identification and Authentication	Access to personal data is limited with administrative controls on accounts. Access to the system is limited by allowing only authorized access that is authenticated using user name/password combinations. System administrator users can be associated with different profiles. Failed logins are logged and restricted to a maximum of three attempts. Communication to the system is performed over authenticated connections, using SSH version 2 or HTTPS (TLS).	Details can be found in the <i>MiVoice</i> <i>MX-ONE Security Description</i> and <i>Security Guidelines, Provisioning</i> <i>Manager Description, and Service</i> <i>Node Manager Description,</i> and in the MiVoice MX-ONE Provisioning Manager Help files. User management setup: In the MX-ONE Service Node, go to mxone_maintenance to set up user accounts. In the MiVoice MX-ONE Provisioning Manager go to the Security Profiles to configure administrative access controls users.
	A customer can further limit access over the network using standard network security techniques such as VLANs, access control lists (ACLs) and firewalls. In all cases, physical access to systems should be restricted by the customer.	Call Detail Record (CDRs/SMDR) setup details can be found in the document <i>Call Information and QoS Logging</i> <i>Operational Directions</i> .
	All data stored at rest (system logs, audit files, and backups) are protected with administrative controls on accounts. Personal data	

Table 1: MiVoice MX-ONE Security Features that customers may require to achieve Compliance withData Security Regulations.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	included in Call Detail Records can be masked or anonymized.	
Communication Protection	Encryption is highly recommended to be used for communications protection. The following controls are available in MiVoice MX-ONE: Data protection	Details can be found in the documents, <i>MiVoice MX-ONE Security Description</i> and <i>Security Guidelines, Provisioning</i> <i>Manager Description, Service Node</i> <i>Manager Description</i> and in the MiVoice MX-ONE Provisioning Manager Help files.
	 MiVoice MX-ONE Service Node SSH version 2 is used to access MiVoice MX-ONE. HTTPS is used between MX-ONE and SIP phones to protect VDP (Visitor Desktop/hot-desking) 	Data protection MiVoice MX-ONE Service Node SSH version 2 is enabled by default in MiVoice MXONE. To enable HTTPS to protect VDP data, go to mxone_maintenance > certificate management. MiVoice MX-ONE Service Node Manager and MiVoice Provisioning
	data transmission. MiVoice MX-ONE Service Node Manager and MiVoice Provisioning Manager • HTTPS is used to protect	Manager To enable HTTPS to protect management data, go to mxone_maintenance > webmanagement. After that, enable HTTPS in the proper Provisioning Manager subsystem.
	data transmission in MiVoice MXONE Service Node Manager and MiVoice MX-ONE Provisioning Manager.	Voice Call Signaling, Voice Streaming, and CSTA traffic To enable encryption in the MX-ONE Service Node, go to mxone_maintenance > certificate
	 HTTPS is used to protect data transmission between Provisioning Manager and Mitel applications as well as third party applications 	management. After that, correctly configure the application that will use encryption; for example, SIP extensions, SIP trunks, or CSTA.
	third-party applications. Voice Call Signaling Only authenticated devices may	Call Privacy (Restrict user identity) There are category parameters that are used to configure the following features in MX-ONE Service Node: - Request A-number from the PSTN

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	Regulationsconnect to the MiVoice MX-ONE.Call signaling between theMiVoice MX-ONE and IP phonesmay be secured with TLS. Notethat TLS 1.3 is the preferredoption to encrypt call signalingwhen it is supported by theterminal. Legacy analog anddigital trunks and devices do notsupport encryption.CSTA trafficMiVoice MX-ONE may beconfigured to encrypt all CSTAtraffic with TLS 1.3.Call Privacy (restrict useridentity)Only authenticated devices mayconnect to the MiVoice MX-ONE.MX-ONE offers options to restrictuser identity as well aspresentation of the phonenumber during a call.Other setupsA customer can further limit access	 Use Number Presentation Restriction Number Presentation Restriction is Permitted per Call Calling Line Identification Presentation Restriction Override Never Display Number from PSTN Configure the Common Service Profile or the category as needed. To restrict name presentation (user identity) in calls in the MiVoice MX- ONE Service Node Manager, go to the Telephony > Extension > Common Service Profiles and select/edit a CSP Number Presentation.
	over the network using standard network security techniques such as VLANs, and firewalls.	
Access and Authorization	Access to the MiVoice MX-ONE system is restricted by a login password. All personal data processing is protected with role-based access and authorization controls. This includes personal data processing by data subjects, administrators, and technical support.	Details can be found in the documents, <i>MiVoice MX-ONE</i> <i>Security Description</i> and <i>Security</i> <i>Guidelines, Provisioning Manager</i> <i>Description, Service Node Manager</i> <i>Description</i> and in the MiVoice MX- ONE Provisioning Manager Help files. Linux accounts are managed in the MX-ONE Service Node (mxone_maintenance).
	All system data processing and all	System administrators and technical support personnel can:

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	access to databases, files, and operating systems, are protected with role-based access and authorization controls. A customer can further limit access over the network using standard network security techniques such as VLANs, ACLs, and firewalls. In all cases, physical access to systems should be restricted by the customer.	 Set/reset the password Enable/disable the Login banner Provisioning Manager administrators and end-users can manage their account settings in the end-user information task. They can: Set/reset the password Set/reset PIN for extensions In the MX-ONE Service Node, the following task is used to establish role-based access controls: mxone_maintenance, user task In the MiVoice MX-ONE Provisioning Manager, the following task is used to establish role-based access controls: Security Profile task (when using the System Setup Admin account). This task is used to create, modify, and delete user security profiles that are required to access the following MiVoice MX-ONE management interfaces: Provisioning Manager, Administration Portal Service Node Manager
Data Deletion	The system provides the administrator with the ability to delete a user, or to delete a user and all phone services including MiCollab, CMG, and MiCollab Advanced Messaging services associated with that user.	Details can be found in the document <i>MiVoice MX-ONE</i> Security Description and Security Guidelines, Provisioning Manager Description, Service Node Manager Description and in the MiVoice MX- ONE Provisioning Manager Help files.
	Deleting a User and Phone Services MiVoice MX-ONE allows the administrator to delete a user, the user and all of the user's associated phone services.	Deleting a user in MX-ONE Service Node In the MiVoice MX-ONE Service Node, command line interface (CLI) is used to delete user data; basically, first name, last name,

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	Deleting LogsCertain types of logs cannot be deleted on a per user basis such as Call Detail Record logs.However, MiVoice MXONE provides the administrator with 	extension number, function keys, and VDP (visitor desktop/ hot desking) data. Deleting a user in MX-ONE Provisioning Manager In Provisioning Manager, the extension task is used to delete a user or to delete a user and all associated phone services, including MiCollab, CMG, and MiCollab Advanced Messaging. Deleting Logs The System Administrator can
	logs from these systems, refer to the vendor's documentation.	delete system logs from the MiVoice MX-ONE using the root account or mxone_admin account. However, Linux audit logs cannot, for other security reasons, be deleted.
Audit of logs	The system provides the administrator with the ability to delete a user, or to delete a user and all phone services including MiCollab, CMG, and MiCollab Advanced Messaging services associated with that user.	Details can be found in the document Security Description and Security Guidelines, Provisioning Manager Description, Service Node Manager Description and in the MiVoice MX-ONE Provisioning Manager Help files.
	Deleting a User and Phone Services MiVoice MX-ONE allows the administrator to delete a user, the user and all of the user's associated phone services.	Audit logs In the MX-ONE Service Node, the audit logs are enabled by default and these logs can be accessed only by the root account.
	Deleting Logs Certain types of logs cannot be deleted on a per user basis such as Call Detail Record logs. However, MiVoice MXONE	In the MiVoice MX-ONE Provisioning Manager and Service Node Manager, the Audit Trails Logs task provides a historical record of changes

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	provides the administrator with the ability to delete the entire contents from almost all logs, except the audit log in Service Node.	made to the system from the MX-ONE Management tools.
	Note: Logs that are transferred to external or third-party systems are not deleted by this step. For information about how to delete logs from these systems, refer to the vendor's documentation.	CIL logs In the MX-ONE Service Node, the Call Information Logging is configured via the command-line interface (CLI).
End Customer Guidelines	MiVoice MX-ONE Security Guidelines are available to assist with installation, upgrades, and maintenance.	The MiVoice MX-ONE Security Guidelines provide detailed recommendations on how the MiVoice MX-ONE security-based features can be used within the customer GDPR compliance initiatives. The MiVoice MX-ONE Security Guidelines can be found in the MiVoice MX-ONE CPI documentation.
Communications Protection	Encryption is highly recommended to be used for communications protection. The following controls are available in MiVoice MX-ONE: Data protection MiVoice MX-ONE Service Node	Details can be found in the <i>MiVoice</i> <i>MXONE Security Description</i> and <i>Security Guidelines, Provisioning</i> <i>Manager Description and Service</i> <i>Node Manager Description,</i> and in the MiVoice MX-ONE Provisioning Manager Help files.
	 SSH version 2 is used to access MiVoice MX- ONE. HTTPS is used between MX-ONE and SIP phones to protect VDP (Visitor 	Data protection MiVoice MX-ONE Service Node SSH version 2 is enabled by default in MiVoice MXONE. To enable HTTPS to protect VDP data, go to mxone_maintenance > certificate management

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	-	
	Desktop/hot-desking)	
	data transmission.	Million MAY ONE Constant and
	MiVoice MX-ONE Service	MiVoice MX-ONE Service Node
	Node Manager and MiVoice	Manager and MiVoice
	Provisioning Manager	Provisioning Manager
		To enable HTTPS to protect
	HTTPS is used to	management data, go to
	protect data	mxone_maintenance >
	transmission in	webmanagement
	MiVoice MXONE	After that, enable HTTPS in the
	Service Node Manager	proper Provisioning Manager
	and MiVoice MX-ONE	subsystem.
	Provisioning Manager.	Voice Call Signaling, Voice
	HTTPS is used	Streaming, and CSTA traffic
	to protect data	To enable encryption in the MX-
	transmission between	ONE Service Node, go to
	Provisioning Manager	mxone_maintenance > certificate
	and Mitel applications	management.
	as well as third-party applications. Voice Call Signaling	After that, correctly configure the application that will use encryption; for example, SIP extensions, SIP trunks, or CSTA.
	Only authenticated devices	Call Privacy (Restrict user identity)
	may connect to the MiVoice	There are category parameters
	MX-ONE. Call signaling	that are used to configure the
	between the MiVoice MX-ONE	_
	and IP phones may be secured	following features in MX-ONE Service Node:
	with TLS. Note that TLS 1.3 is	Service node.
	the preferred option to	- Request A-number from the PSTN
	encrypt call signaling when it	- Use Number Presentation
	is supported by the terminal.	Restriction
	Legacy analog and digital trunks and devices do not	- Number Presentation Restriction is
	support encryption.	Permitted per Call
	support end yption.	- Calling Line Identification
		Presentation Restriction
	CSTA traffic	Override
	CSTA traffic	- Never Display Number from PSTN
	MiVoice MX-ONE may be	
	configured to encrypt all CSTA	Configure the Common Service
	traffic with TLS 1.3.	Profile or the category as needed.
	Call Privacy (restrict user	

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	identity) Only authenticated devices may connect to the MiVoice MX-ONE. MX-ONE offers options to restrict user identity as well as presentation of the phone number during a call.	To restrict name presentation (user identity) in calls in the MiVoice MX- ONE Service Node Manager, go to the Telephony > Extension> Common Service Profiles and select/edit a CSP Number Presentation and fill in the following forms.
	Other setups A customer can further limit access over the network using standard network security techniques such as VLANs, and firewalls. Remote Access Security The firewall can also be programmed to allow Virtual Private Network (VPN) tunnels with PPTP and IPSec pass- through and inbound connections with IP Port Forwarding.	 Port Forward Table Form to configure the MiVoice MX- ONE's integral router. IP Routing Form to configure routing capabilities. Firewall Control Form to configure the integral Internet gateway. Embedded UM (Unified Messaging) Settings Form to configure the IMAP Server connection.
	IMAP Server Transmission of user names and passwords between the MiVoice MX-ONE and an IMAP server may be secured with TLS.	
	A customer can further limit access over the network using standard network security techniques such as VLANs, and firewalls.	
	In all cases, physical access to systems should be restricted by the customer.	
Access and Authorization	Role-Based Access MiVoice MX-ONE supports up to 5 System Administration Tool users, 5 Group	Details can be found in the <i>MiVoice</i> <i>MX-ONE Security Guidelines</i> and in the <i>MiVoice MX-ONE System</i> <i>Administration Tool</i> Help files.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	RegulationsAdministration Tool users, and 10 Desktop Tool users at a time.Only the root administrator can program access to the System 	In the MiVoice MX-ONE System Administration Tool, the following forms are used to establish role- based access controls: • User Authorization Profiles Form. This form is to create, modify, and delete user profiles that are required to access the following MiVoice MX-ONE management interfaces: • System Administration Tool • Group Administration Tool • Desktop Tool • The Admin Policies Form. This form is used to add, modify, and delete policies that are used to establish permissions for various user profiles. These permission policies dictate which System Administration Tool forms a user is allowed
Data Deletion	Deleting a User's Embedded Voice Mail Box The MiVoice MX-ONE allows the	to access or modify. Details can be found in the, <i>MiVoice</i> <i>MX-ONE Security Guidelines</i> and in the <i>MiVoice MX-ONE System</i>
	administrator to delete a user's embedded voice mail box. Deleting a User from the Telephone Directory The MiVoice MX-ONE allows the administrator to delete a	Administration Help files. In the MiVoice MX-ONE System Administration Tool, the following forms and procedures are used to erase a personal data:

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	 user from the telephone directory. Deleting Logs Certain types of logs cannot be deleted on a per user basis such as Call Detail Record logs, CESID logs, and HotDesking Logs. However, MiVoice MX-ONE provides the administrator with the ability to delete the entire contents from all logs. Note: Logs that are transferred to external or third-party systems are not deleted by this method. For information about how to delete logs from these systems, refer to the vendor's documentation. 	 The User and Services Configuration Form. This form is used to delete a user or to delete a user and all associated phone services. The User and Services Configuration Form is also used to delete a user's embedded voice mailbox. Alternately, the administrator's mailbox can be used to delete a user's mailbox. The Telephone Directory Form. This form is used to delete a user from the telephone directory.
	Deleting Voicemail Messages The system provides the administrator with the ability to erase a voicemail message that was left in the end-user's voicemail box by a customer. The system administrator can, once authenticated, log in to the shell and locate and delete the file that contains the voicemail message based on the user's extension number and the time that the recording was left in the user's voicemail box.	 MiVoice MX-ONE supports several logs. For a complete list of logs and the forms that are used to manage the logs, refer to the MiVoice MX-ONE System Administration Tool Help files. The System Administrator can delete Property Management System occupancy logs from the MiVoice MX-ONE, for details refer to the MiVoice MX- ONE Security Guidelines, in the section Audits and Logs. In the MiVoice MX-ONE System Administration Tool Help files, look under Property management System (PMS) for additional information about PMS logs.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
Audit	Audit trails are supported to maintain records of data processing activities.Audit Trail Logs Audit Trail Logs provide a 	Details can be found in the document <i>MiVoice MX-ONE Security</i> <i>Guidelines</i> and in the <i>MiVoice MX-ONE System Administration Tool</i> Help files. In the <i>MiVoice MX-ONE System</i> <i>Administration Tool,</i> go to the: • <i>Audit Trails Logs Form.</i> This form provides a historical record of changes made to the system from the System Administration Tool and various other user interfaces and applications. <i>SMDR Options Form</i> (Station Management Detail Recording). This form is used to configure SMDR options.
End Customer Guidelines	based accounting. MiVoice MX-ONE Security Guidelines are available to assist with installation, upgrades, and maintenance.	The MiVoice MX-ONE Security Guidelines provide detailed recommendations on how the MiVoice MX-ONE security-based features can be used within the customer GDPR compliance initiatives. The MiVoice MX-ONE Security Guidelines are available at Mitel online.

6 Query/Printing of Personal Data

6.1 Query/Printing of End-User's Data

Query/printing of an end-user's personal data in an MX-ONE system is done via MX-ONE Provisioning Manager or via MX-ONE O&M commands for the query/printing of extensions, names, PBX operators, voice mailboxes, diversion data, call list data, personal number data, and so on. See applicable Operational Directions and MX-ONE Provisioning Manager online help text. See also third-party documentation if applicable (for example, for Voice Mail systems).

6.2 Query/Printing of Customer's Data

Query/printing of a Mitel customer's personal data for a customer, in an MX-ONE system, is done via MX-ONE Service Node Manager, MX-ONE Provisioning Manager, or via MX-ONE O&M commands for the query/printing of such customer data. The related end-user data for that customer can also be printed. See applicable Operational Directions and MX-ONE Provisioning Manager on-line help text.

6.3 Query/Printing of System Administrators or Technical Support Personnel

Query/printing of a system Administrator's or Technical support personnel's personal data in an MX-ONE system is done via the *mxone_maintenance* tool. See the *mxone_maintenance* tool's on-line instructions.

7 Removal of Personal Data

7.1 Removal of End-User's Data

The removal of an end-user's personal data in an MX-ONE system is done via MX-ONE Provisioning Manager or via MX-ONE O&M commands for the removal of extensions, names, PBX operators, voice mailboxes, diversion data, call list data, personal number data, and so on.

See applicable Operational Directions and MX-ONE Provisioning Manager on-line help text. See also third-party documentation if applicable (for example, for Voice Mail systems).

7.2 Removal of Customer's Data

The removal of a Mitel customer's personal data for a customer, in an MX-ONE system, is done via MX-ONE Service Node Manager, MX-ONE Provisioning Manager, or via MX-ONE O&M commands for the removal of such customer data. Of course, the related end-user data for that customer must have been removed before. See applicable Operational Directions and MX-ONE Provisioning Manager on-line help text.

7.3 Removal of System Administrators or Technical Support Personnel

The removal of a system Administrator's or Technical support personnel's personal data in an MX-ONE system is done via the *mxone_maintenance* tool. See the *mxone_maintenance* tool's on-line instructions.

8 Data Security Regulations

This section provides an overview of the security regulations that MiVoice MX-ONE customers may need to be compliant with.

8.1 The European Union General Data Protection Regulation (GDPR)

The European Union (EU) General Data Protection Regulation (GDPR) effective on 25 May 2018 replaces the previous EU Data Protection Directive 95/46/EC.

The intent of GDPR is to harmonize data privacy laws across Europe so that the data privacy of EU citizens can be ensured. GDPR requires businesses to protect the personal data and privacy of EU citizens for transactions that occur within EU member states. GDPR also addresses the export of personal data outside of the EU. Any business that processes personal information about EU citizens within the EU must ensure that they comply with GDPR. Under GDPR, 'processes personal information' means any operation performed on personal data, such as collecting, recording, erasing, usage, transmitting, and disseminating.

8.1.1 What do Businesses need to know about GDPR?

GDPR applies to businesses with a presence in any EU country, and, in certain circumstances, to businesses that process personal data of EU residents even if the businesses have no presence in any EU country.

In order to achieve GDPR compliance, businesses must understand what personal data is being processed within their organization and ensure that appropriate technical and organizational measures are used to appropriately safeguard such data. Table 1 explains what personal data is processed by Mitel's MiVoice MX-ONE and highlights available security features to safeguard such data.

9 Product Security Information

9.1 Mitel Product Security Vulnerabilities

The Product Security Policy discusses how Mitel assesses security risks, resolves confirmed security vulnerabilities, and how the reporting of security vulnerabilities is performed.

Mitel's Product Security Policy is available at: https://www.mitel.com/support/security-advisories/mitel-product-security-policy

9.2 Mitel Product Security Advisories

Mitel Product Security Advisories are available at:_ https://www.mitel.com/support/security-advisories

9.3 Mitel Security Documentation

Mitel security documentation includes product-specific; Security Guidelines, and Important Information for Customer GDPR Compliance Initiatives and Data Protection and Privacy Controls. Mitel also has Technical Papers and White papers that discuss network security and data centre security.

Mitel Product Security Documentation is available at: <u>https://www.mitel.com/en-ca/document-center</u>

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