

Mitel 6800/6900 Series SIP Phones – Personal Data Protection and Privacy Controls

Mitel 6800/6900 Series SIP Phones SIP Firmware Release 6.0

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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 particular document will be of interest to Mitel MiVoice 6800/6900 Series SIP Phone customers who are putting security processes and security controls in place to comply with data security regulations.

This document is intended to assist Mitel MiVoice 6800/6900 Series SIP Phone customers with their data security regulations compliance initiatives by:

- Identifying the types of personal data that are processed by Mitel MiVoice 6800/6900 Series SIP Phones
- Listing the Mitel MiVoice 6800/6900 Series SIP Phone Security Features that customers may require to achieve compliance with security regulations
- Providing a description of the Mitel MiVoice 6800/6900 Series SIP Phone Security Features
- Providing information on where the Mitel MiVoice 6800/6900 Series SIP Phone Security Features are documented

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

1.2 What is New in this Release

There are no personal data related changes in this release.

2 Personal Data Collected by Mitel MiVoice 6900 Series SIP Phones

During the course of installation, provisioning, operation and maintenance, the Mitel MiVoice 6800/6900 Series SIP Phones **collects** data related to several types of users, including:

- End users of Mitel MiVoice 6800/6900 Series SIP Phones, typically Mitel customer employees using Mitel phones and collaboration tools – for example phone number, email address and location.
- Customers of Mitel customers – for example, call recordings contain personal content of both parties in the call; the end user's personal contact lists may contain personal data of business contacts.
- System administrators and technical support personnel – Logs and audit trails contain records of the activities of system administrators and technical support personnel.

3 Personal Data Processed by Mitel MiVoice 6900 Series SIP Phones

The Mitel MiVoice 6800/6900 Series SIP Phones process the following types of data:

- **Provisioning Data:**
 - Business extension/directory number/mobile phone contacts, and username/password
- **Maintenance, Administration, and Technical Support Activity Records:**
 - Mitel product support logs
- **User Activity Records:**
 - Call history for both calling and called parties, any dialled number including favorites, contact lists and location information.
- **User Personal Content:**
 - Personal phone contact directory, corporate directory, mobile phone contact directory, and speed dial information.
 - Call audio
 - Bluetooth integration may include personal contacts from the attached device

Personal data processed by the Mitel MiVoice 6800/6900 Series SIP Phones is required for the delivery of communication services, technical support services or other customer business interests. For example, call billing and reporting services.

The Mitel MiVoice 6800/6900 Series SIP Phones process only personal data that is required for the delivery of communication services, technical support services, or other customer business interests, for example, call quality and reporting services.

- There are no end user opt-in consent mechanisms implemented in Mitel 6800/6900 Series SIP Phones.

4 Personal Data Transferred by Mitel MiVoice 6900 Series SIP Phones

The types of **personal data transferred** among the Mitel 6800/6900 Series SIP Phones and various applications and services will depend on the specific use requirements of those applications or services, for example:

- Voice quality logs, voice quality statistics, phone inventory, username, and phone number may be configured to be read by the Mitel Performance Analytics system and other customer authorized systems
- Call history, personal phone contact directory, mobile phone contact directory and speed dial information may be transferred to the customer's PBX or Call Server
- In certain situations, the SIP Phone may be configured to duplicate the audio stream in real time to be sent to customer authorized external call recording equipment
- Optionally a Bluetooth handset or headset instead of a wired handset may be utilized, in which case, the audio is transferred between the Bluetooth handset and the 6800/6900 IP Phone
- IEEE 802.1X credentials may be collected, which may or may not be related to personal credentials
- Location information learned via LLDP-MED may be transferred to a third-party system

5 How the Security Features Relate to Data Security Regulations

Mitel 6800/6900 Series SIP Phones provides security-related features which allow customers to secure user data and telecommunications data and to prevent unauthorized access to the user's data

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

Table 1: Mitel MiVoice 6800/6900 Series SIP Phone Security Features which customers 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, and Identity Authentication	<p>Access to personal data is limited with the following controls:</p> <p>Hot Desk Log in The MiVoice 6800/6900 Series SIP Phones may be configured to operate as Hot Desk phones. Configuring is performed using the Configuration file. Access to a Hot Desk phone is limited by only allowing access to a user that is authenticated with a Hot Desk Personal Identification Number (PIN). Hot Desk PIN Security ensures that all hot desk users are mandated to create strong PINs that adhere to a set of strengthening rules.</p> <p>Unauthorized users are prevented from:</p> <ul style="list-style-type: none"> • Receiving incoming calls at the set • Placing outgoing calls • Retrieving voice messages • Programming and using the feature keys <p>Phone Administrator Passcode The advanced options settings on the MiVoice 6800/6900 Series SIP Phones relate to administrator level functions and can be accessed only by the administrator. The advanced options are protected with an administrator's passcode.</p> <p>For an administrator, the default username is 'admin', and the passcode is a numeric passcode. For an end user, the default username is 'user'; the passcode is a numeric passcode.</p> <p>Phone Lock The Phone Lock feature allows the end user to 'lock' and 'unlock' their phone with a Personal Identification Number. Phone Lock prevents</p>	<p>Details are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the section <i>Configuring Advanced Operational Features</i>. Also see <i>Visitor Desk Phone Support</i>.</p> <p>Details related to the Administrator Password are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Administrator Options</i>.</p> <p>Details related to Phone Lock are available in the Mitel 6800/6900</p>

	<p>unauthorized access to all the features on the phone. When a phone is locked, all programmable keys and softkeys are disabled except the feature access keys for Phone Lock, Hot Desk, and Emergency Notification.</p> <p>Network Access Sets can support secured network access through IEEE 802.1X. This feature supports both the EAP-MD5 and EAP-TLS Protocols.</p> <p>Web Access The Mitel Web UI has HTTPS enabled by default on IP phones. When you open a browser window and enter an IP address or host name for a phone using HTTP, a server redirection occurs, which automatically converts an HTTP connection to an HTTPS connection.</p> <p>The configuration file allows specification of SIP Root and Intermediate Certificate files, local certificate files, private key filename, and/or trusted certificate file name when the phone uses the TLS transport (TLS1.2) protocol to set up a call.</p> <p>The System Administrator can disable the Mitel Web UI on a single phone or on all phones, if required, using the configuration files.</p> <p>MiCloud Connect and MiVoice Connect First, the phone establishes a secure channel (SIP TLS1.2) between the phone and the SIP server.</p> <p>Next, the phone receives a URL (from the SIP server) for the CAS server (Client Application Server). This allows the phone to create a second secure channel between (HTTPS) the phone and the CAS server so that the phone may be assigned by sending credentials (username and password) entered by the user.</p> <p>After successful authentication with the CAS server, the SIP server will bind the phone with the credentials entered and fully register the phone (using SIP to send configuration data).</p>	<p>Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p>
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	Secure channels between the phone and servers (SIP and CAS) use HTTPS, a MAC based certificate is used for MTLS (Mutual TLS). (no credential is stored on the phone, and all data are encrypted in transit).	
Communications Protection	<p>Communications protection is provided with the following controls:</p> <p>Voice Streaming Mitel 6800/6900 Series SIP Phones may be configured to encrypt all IP voice call media streams with Secure Real Time Protocol (SRTP) using AES 128/AES 256 encryption.</p> <p>Voice Call Signaling Voice call signaling between the Mitel 6800/6900 Series SIP Phones and the MiVoice Business may be secured with SIP with Transport Layer Security (TLS1.2).</p> <p>Call Privacy Caller privacy is controlled through the set's configuration file or through web server settings, Call Display settings, IP Phone Peripheral settings for Bluetooth, and USB and the PC port settings.</p> <p>Other Setups A customer can further limit access over the network using standard network security techniques such as VLANs, access control lists (ACLs), and firewalls.</p> <p>In all cases, physical access to systems must be restricted by the customer.</p>	<p>Details related to encryption for voice streaming and call signaling are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide and in the product documentation for the PBX to which the phone connects.</p> <p>Call Privacy support depends on the PBX. For details, see the appropriate PBX product documentation.</p>
Data Deletion	<p>The 6800/6900 SIP Phones can be reset to factory default when required. In addition, an end user or an administrator has the ability to erase the end user's personal data.</p> <p>Corporate Contacts Folder The administrator can delete all entries in the Corporate Contacts folder.</p>	<p>6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to the Personal Contacts Folder are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p>

	<p>Personal Contacts Folder The end user can delete all entries in the Personal Contacts folder.</p> <p>Call History The end user can delete all entries in the Call History application regardless of call type, all entries within a call type folder, or individual entries.</p> <p>Mobile Contacts Folder The end user can delete all entries in the Mobile Contacts folder.</p> <p>Speed Call Information The end user can delete all entries in the Speed Call directory.</p>	<p>Details related to the Call History are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to the Mobile Contacts Folder are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to deleting Speed Dial entries are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p>
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6 Data Security Regulations

This section provides an overview of the security regulations that Mitel MiVoice 6800/6900 Series SIP Phones customers may need to be compliant with.

6.1 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.

6.1.1 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 Mitel MiVoice 6800/6900 Series SIP Phones and highlights available security features to safeguard such data.

7 Product Security Information

7.1 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>

7.2 Mitel Product Security Advisories

Mitel Product Security Advisories are available at:

<https://www.mitel.com/support/security-advisories>

7.3 Mitel Security Documentation

Mitel security documentation includes product-specific Security Guidelines, 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:

<https://www.mitel.com/en-ca/document-center>

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