

GTT PRIVACY DATA SHEET

FOR Cloud UC Service

SERVICE DESCRIPTION

This Privacy Data Sheet outlines how and why we process personal data in connection with Cloud UC (the “Service”). It provides details on where we store and transfer that personal data, how we maintain its security, and our compliance with relevant privacy laws and regulations. We will process personal data in accordance with this Privacy Data Sheet and with our [Privacy Policy](#).

The Service is a cloud-based business telephone system made available by GTT to companies or persons who acquire it for use by their authorized users.

The Service description and the applicable service level agreements (collectively “SLA”) can be found in the GTT Enterprise PBX Service Schedule, which is available upon request.



TYPES OF (CLIENT) END USER DATA

Categories of Personal Data	Types of Personal Data
Registration Information	• Authentication Token • Names and Aliases • Email Address • Phone Number • Credentials – User ID, Password, PINs • Cookies • Company Name • Company Contact Name and Title • Company Physical Address • Company Time Zone • Organization ID • Customer Order Information • SIP Identifier • Voicemail Box Number • Device Activation Codes
Host and Usage Information	• Credentials – SIP, Web Interface, XSI • Profile Data – Service Feature Settings • Connectivity Data – IP Address, MAC Address, Device Identifiers (IMEI), MSISDN, Landline Number, SIP Number • Usage Data – Communications, Metadata, Call Logs • Call Detail Records (“CDRs”) • Portal Access Details – Domain Name or IP Address of the User, File Name and URL Requested by the Client, Website from which the User is Visiting the Service • Geolocation – Based on IP Address or Device Location • Contact Lists • Cookies • Billing Files • Log Files Containing Communications Traffic Data • Device Name • Time Zone • Universal Unique Identifier
User – Generated Information	• Uploaded Media Files such as Voice Greetings • Voice Messages • Call Recordings

PURPOSE OF PROCESSING (PROCESSOR)

- Service Provision
- Reporting
- Service Management
- Technical Monitoring
- Customer Support
- Troubleshooting
- Legal and Compliance

DATA RETENTION & DELETION

The table below lists the applicable retention periods for each category of personal data processed by GTT in connection to the Service.

Categories of Personal Data	Retention Period
Client Personal Data	Client may request deletion of personal data retained on the Service by sending a request to GTT, who will inform Cisco. Cisco endeavours to delete the requested data from its systems within 30 days, unless the data is required to be retained under applicable law or for Cisco's legitimate business purposes. If Cisco is required to retain certain categories of data within Webex Calling, the reason why they retain it and the retention period are described in their Cisco Webex Calling Privacy Data Sheet available here .



DATA LOCATION & STORAGE

Storage Location	Access Location
Cisco hosted database in the USA, Germany, UK, Australia, Japan, Canada, Singapore, The Netherlands	GTT Personnel: Authorized personnel located in Bulgaria, India, and USA or other locations with authenticated access into the appropriate management platform.

PERSONAL DATA TRANSFER

To ensure compliant data transfers across jurisdictions, GTT has established an Intra Group Data Transfer Agreement (IGDTA) between GTT's entities. This agreement utilizes the EU Standard Contractual Clauses and other applicable data transfer mechanisms as needed to maintain lawful and secure data processing practices.

For Cisco's Cross-Border Data Transfer Mechanisms, please refer to Cisco Webex Calling Privacy Data Sheet available [here](#).

ACCESS TO PERSONAL DATA

Authorized Users, Client, and GTT can access personal data in connection to the Service as described in the table below.

Parties with Access	Justification	Access Control
GTT Personnel	• Manager users and administer service • Modify, control and delete information	Corporate Credentials and MFA (available)
Client (Users through the End-User Portal)	• Modify, control and delete information • View interaction information and usage history • Update information such as Service Feature Settings and Contact Lists	Client Credentials and MFA (available)
Cisco	• Deliver, support and improve the Service in accordance with Cisco data access and security controls process • Detect and prevent fraud	Cisco access controls in accordance with Cisco Webex Calling Privacy Data Sheet available here .



THIRD-PARTY SERVICE PROVIDERS (SUB-PROCESSORS)

Below is a list of third-party service providers that GTT may use to deliver the service, along with links to their respective privacy policies.

Third-Party Suppliers	Country	Supplier's Privacy Statement
Cisco	Global	https://www.cisco.com/c/en/us/about/legal/privacyfull.html
Cisco Sub-Processors	Global	Please refer to Cisco Webex Calling Privacy Data Sheet available here .