GDPR and MyCalls

Copyright

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WHAT THIS GUIDE CONTAINS

This document is intended to help you fulfil your GDPR obligations.

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Contents

What does GDPR mean

GDPR is an acronym for General Data Protection Regulations and is a set of European regulations that control how personal information is stored and accessed.

Part of these regulations are that a person can request a company to delete all references to themselves. This means that all applications that the company uses must have the ability to remove the personal information relating to that individual from their database.

In the case of this application, that means all the references to that person's name, phone number and call recordings.

The regulations also deal with personal information retained for certain business reasons, such as financial data. This information may be retained for a certain period of time but after that time has expired, it must also be removed.

How to remove Personal Information

Personal information is stored in a variety of places. Some of the information can be removed by simply specifying a phone number and letting the application delete the related database entries. For incoming calls the caller ID is removed, for outbound calls the dialled number is removed. If there is a call recording associated with the call record, this will also be removed.
Other personal information needs to be searched for and deleted on an entry by entry basis.
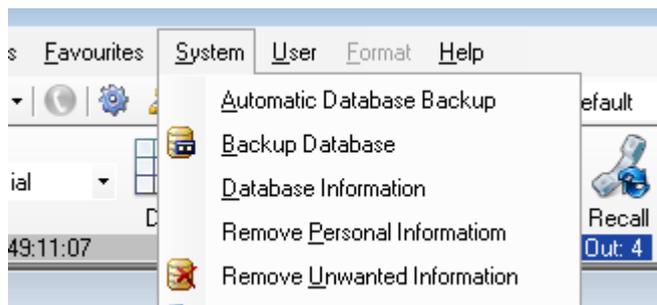
Call Records and Recordings

Removing Personal Information for Individual Callers

The caller information number assigned to calls shown in the call records windows and any associated call recordings can be automatically removed in the following manner.

Log onto the application as a user with PBX Administrator rights

Navigate to the Menu item System->Remove Personal Information

The following dialog will appear

Enter part of the caller number and click the Search button. A list of matching caller numbers will be displayed. Note that at least 5 digits must be entered before a search can be performed.

For each number you want remove from the database and delete the call recording for, click the Delete button.

A message box will appear warning that this action cannot be undone. Click 'Yes' to continue and remove the caller number or 'No' to go back to the dialog.

A confirmation message box will appear detailing how many calls the number has been removed from and the date range these calls spanned. Any call recordings associated to these calls will also have been deleted.

The action will show in the audit log real time window and can be seen in the audit reports. The personal information that was deleted will be partially redacted so that the person cannot be identified.

The dialog will be re-displayed showing the remainder of the matching numbers

Because the same caller number can be presented in several ways, it may be necessary to repeat the delete action for all the variations.

Removing Personal Information for All Callers

As part of the data retention aspects of GDPR, it will be necessary to remove the personal information for all callers once the time limit for keeping that information has expired.

This can be done by using the same dialog as above but searching for the calls to remove using a different filter.

If this is a call centre, for instance, they may be routing their incoming calls using Pilot Numbers - different Pilot Numbers for different classes of call.
In that case, click on Pilot Numbers in the left hand box and select the required Pilot Number from the drop down list.

The same idea would apply if incoming calls were being routed by DID.

Incoming Abandoned calls may or may not have an associated Pilot Number or DID, depending on when they actually were abandoned.
These calls are a special case and have their own Abandoned Calls filter.

For outgoing calls, there would need to be some method of identifying the class of the call. This could be Account Codes or Completion Codes.
Again, select the filter type in the left hand box and then the required code from the drop down list.

If there is no method of tagging the calls in place, then if all the outgoing calls were made by the same set of extensions, these extensions could be placed in a group and then the extension group filter could be used.

Finally, if this was a very simple site that had a blanket policy in place that specified all calls over a certain age should be deleted, then the All Calls filter could be used.
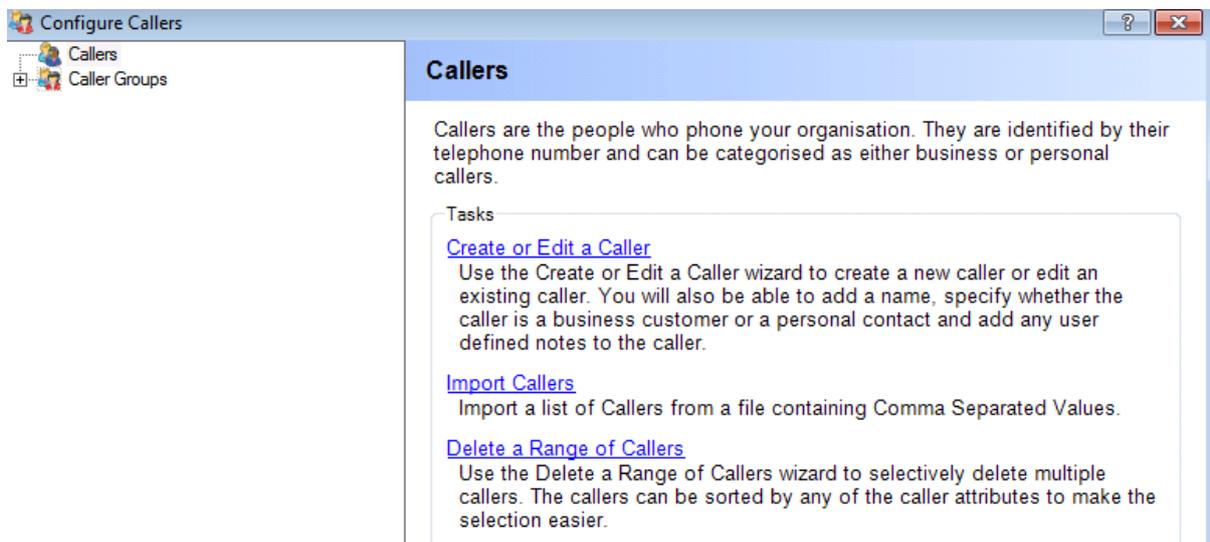
Caller Entries

Log onto the application as a user with PBX Administrator rights
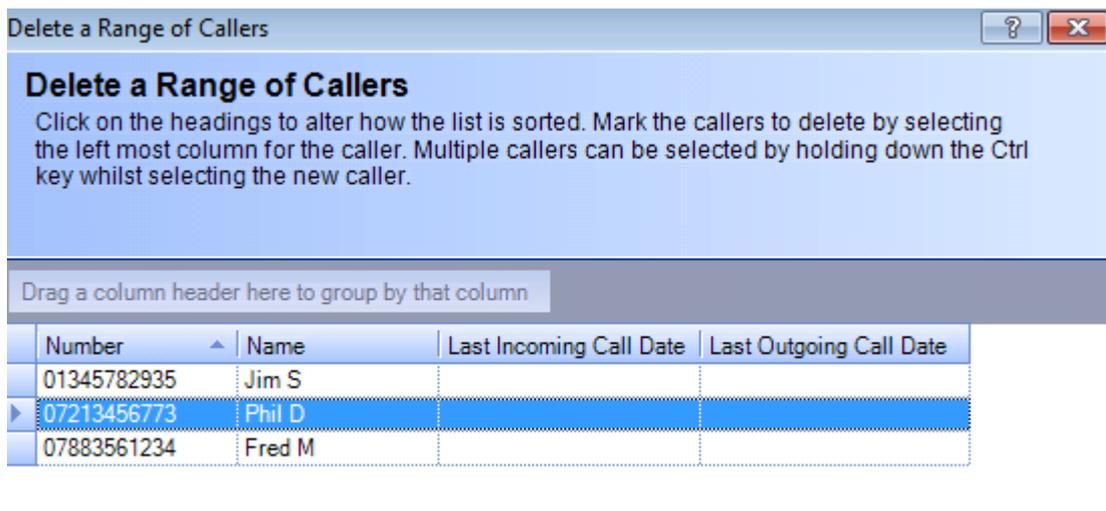
Navigate to the Menu item Configure->Callers
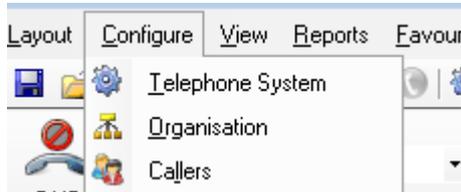
This shows the following dialog.

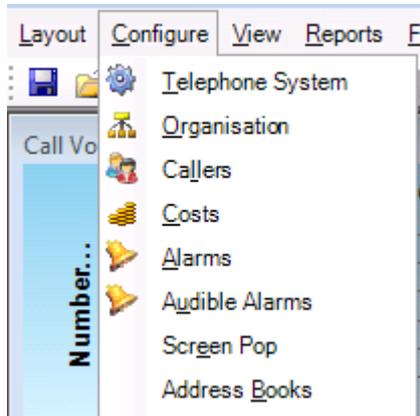Click on Delete a Range of Callers

The entries are sortable by number or name. Select the entries to be deleted and click OK.

This action is not audited as it is a valid everyday action.
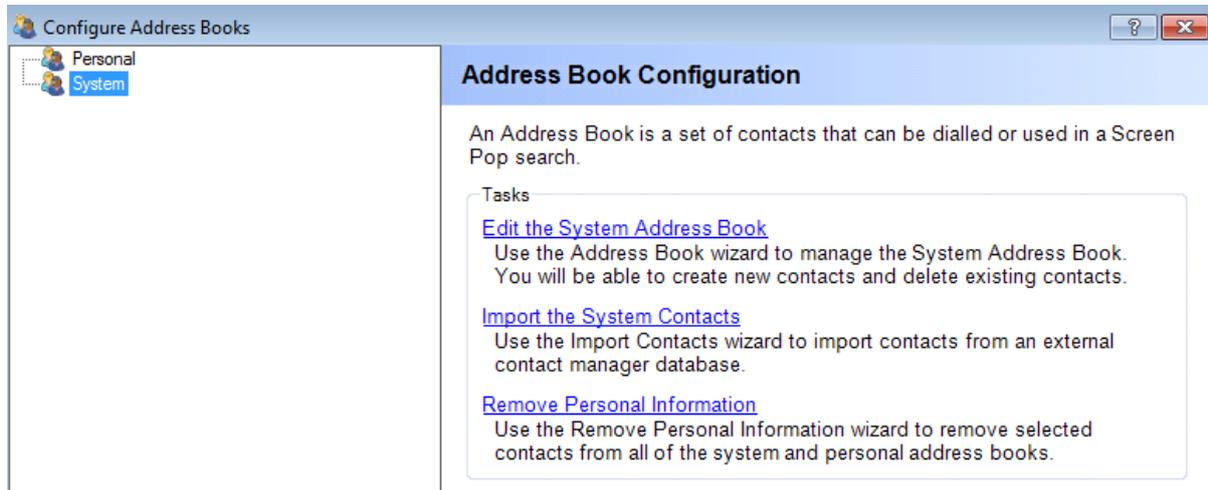
Address Book Entries

Log onto the application as a user with PBX Administrator rights
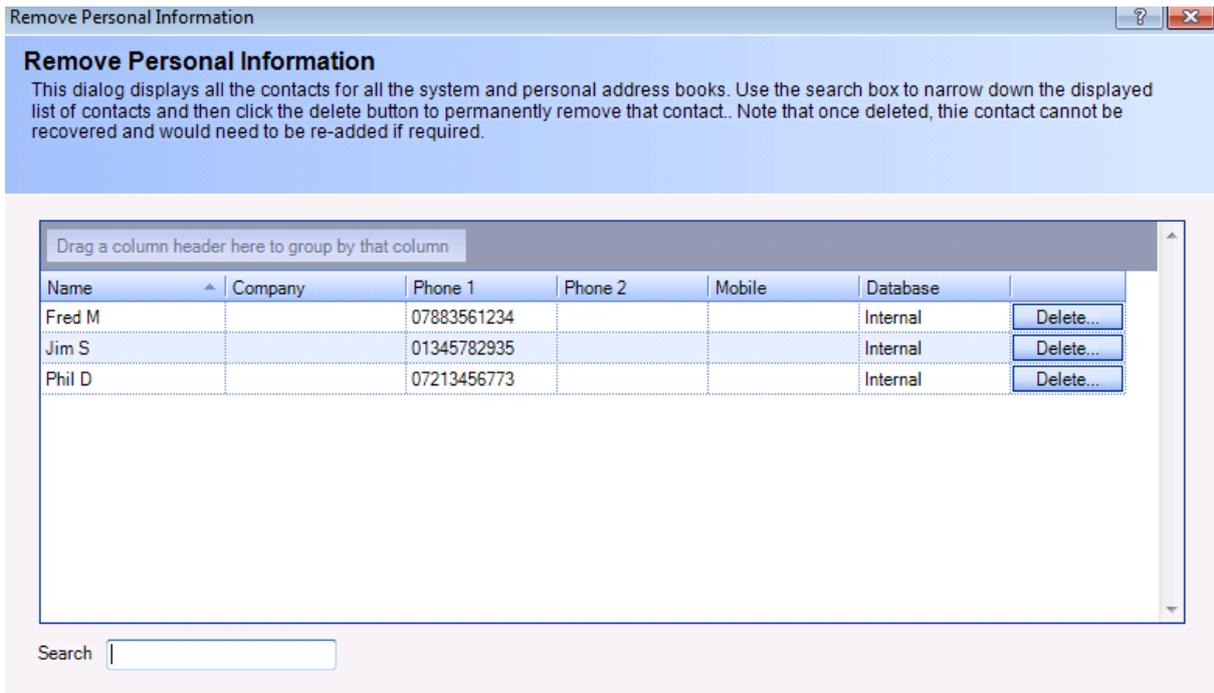
Navigate to the Menu item Configure-> Address Books

This shows the following dialog

Click on Remove Personal Information

Using the search box, the result set can be narrowed down. For each contact to be deleted click the Delete button.

A message box will appear warning that this action cannot be undone. Click 'Yes' to continue and remove the entry or 'No' to go back to the dialog.
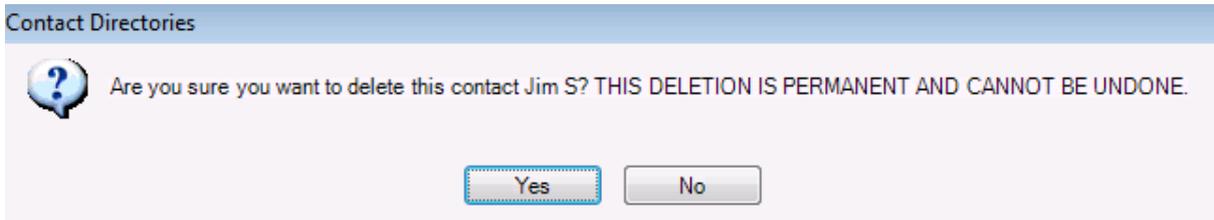
The dialog will be re-displayed showing the remainder of the matching contacts.

The action will show in the audit log real time window and can be seen in the audit reports.

Alarms Entries

It is possible that an alarm was created using a reference to an actual person – using their name or number for example.

Log onto the application as a user with PBX Administrator rights

Navigate to the Menu item Configure-> Alarms
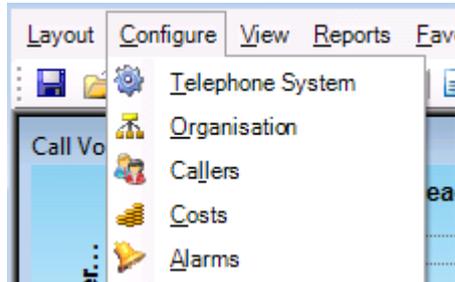
The following dialog will be shown.
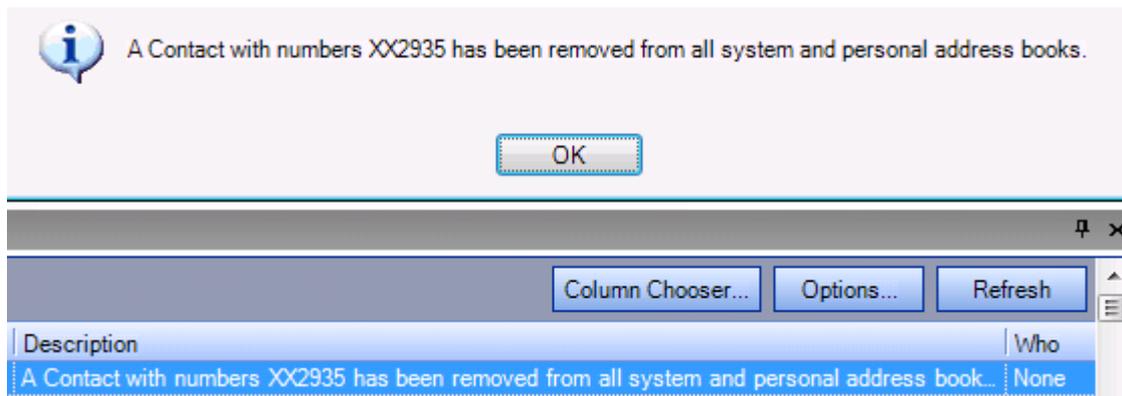

Each '+' sign will need to be clicked on to show the underlying configuration. Any alarms/notifications that refer to the person/number to be deleted will now be visible and a course of action can be taken.

This action is not audited as it is a valid everyday action.

Reports

It is possible that a report was created using a reference to an actual person – using their name or number for example.

Log onto the application as a user with PBX Administrator rights

Navigate to the Menu item Configure-> Reports

The following dialog will be shown
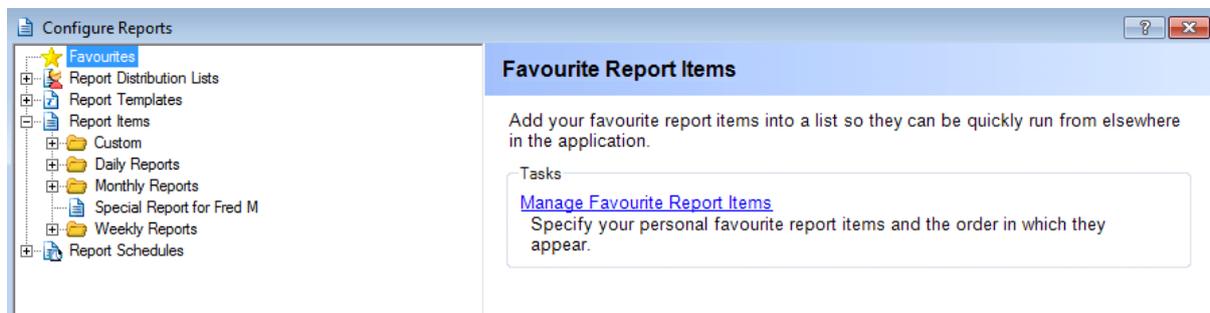
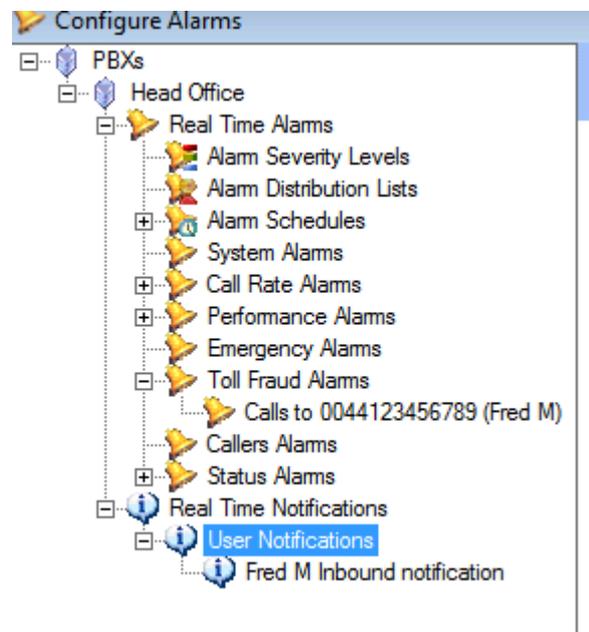Each '+' sign will need to be clicked on to show the underlying configuration. Any reports that refer to the person/number to be deleted will now be visible and a course of action can be taken.

This action is not audited as it is a valid everyday action.

Organisation

A user could have been created for the person to be deleted.

Log onto the application as a user with PBX Administrator rights

Navigate to the Menu item Configure-> Organisation

The following dialog will be shown

Each '+' sign will need to be clicked on to show the underlying configuration. Any users that refer to the person/number to be deleted will now be visible and a course of action can be taken.

This action is not audited as it is a valid everyday action.

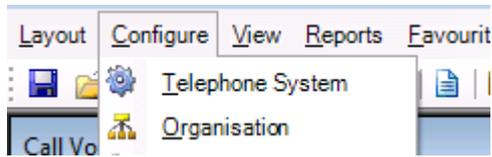## Historical Data Files

Switch SMDR and event data files are kept for a configurable numbers of days. The default is 20 days. Files older than 20 days are deleted automatically. If that is acceptable for your GDPR obligations then no further action needs to be taken.

If 20 days is more than the acceptable threshold for the time taken to remove a person's personal information then the following steps will need to be taken.

The files are kept in a folder called CompressedRecords which is a sub-folder of the main installation folder.
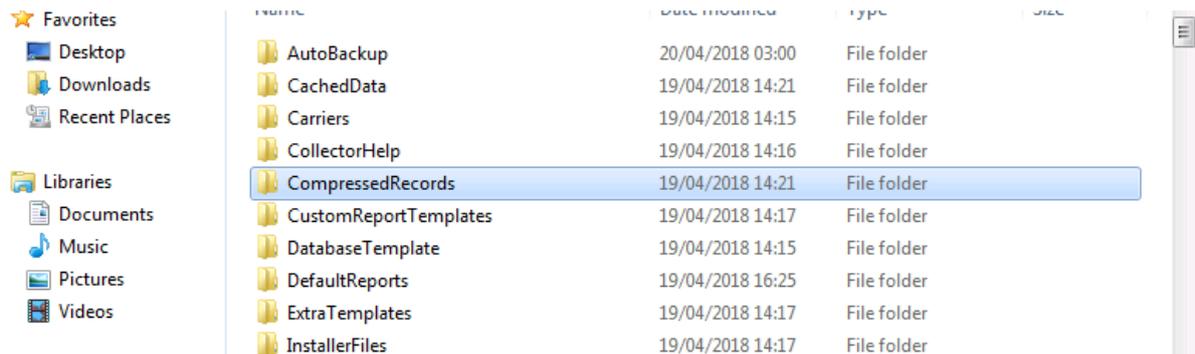
In this folder there are the active files with a .log extension and the archive files with the .zip extension.

The active files cannot be modified as they are in use, so they would need to be modified the following day.

If there is no requirement to keep the historical data, then the zip files can be simply deleted. Be aware, however, that if an issue occurs with the software that happened in the period the historical data would have covered, then that issue would need to be recreated so that new event and SMDR files are generated for it. Typically, deleting the zip files would be the simplest option.

If the files do need to be kept, then any identifying numbers will need to be deleted from these files. This is done in the following manner.

Firstly the files need to be decompressed.
In the SMDR files, the format is as below, the caller number being shown in **bold**

12 IVIN 11:31 065 334333 00:00:06 005V   **441179612300**   0:10
13 IVIN 11:31 005V401   00:00:06 304   **441179632100**   0:07

The caller number digits must be replaced by the character '0'. It is very important that there are the same number of 0s as there were number digits.

In the event files, the format is as below, the caller number being shown in **bold**

P+65 334333 000420103210
P265 4333000420103210

Pt65 **00+441159695700**   0420103210

The number is always part of an event starting with 'Pt'. All of the digits and '+' signs in **bold** must be replaced by the character '0'. It is very important that there are the same number of 0s as there were number digits and '+' signs.

Once the files have been saved, they need to be recompressed with .zip extension. This will allow the automatic delete function to delete them at the appropriate time.