

Service Description for Vonage Contact Center Data Retention

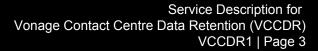
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1. Glossary

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Term	Definition		
Confirmed / Confirm	Means click to confirm by the Administrator which constitutes		
	documented instructions of the Customer.		
Administrator	Means the Authorised User designated or assigned as an		
	Administrator user within VCC.		
Automatic Deletion	Scheduled deletion of Interaction Content based upon a retention		
	policy.		
Retention Policy	A set of rules covering when Interaction Content is to be deleted from the VCC platform.		
Interaction Content	Artifacts that result from and interaction including 1 or more parties.		
Contracted Retention Period	Measured in days, this is the length of time that Interaction Content will be retained on the VCC platform, pursuant to the terms of the		
	Agreement.		
Retention Period	Measured in days, this is the length of time that Interaction		
	Content is to be retained on the VCC platform, as specified by an		
	Administrator.		
VCC/Vonage CC	Vonage Contact Center		
VCC Platform	The Vonage Contact Center platform		
VCC Portal	The interface used to administer and maintain the Customer's VCC		
	Account.		
VCC Account	The Customer's Vonage Contact Center Account		

2. Overview

Vonage establishes and enables retention and destruction procedures for certain data captured during a Customer's use of the Vonage Contact Center (VCC) Platform. Such data is referred to as Interaction Content defined further below.

As part of the VCC subscription, Vonage sets and provides standard retention periods for Interaction Content. The standard retention periods will vary according to the subscription package subscribed to. Vonage also provides Customers with the ability to extend or reduce the standard retention periods because Vonage understands that, for some Customer organizations, it may be important to retain Interaction Content for longer than the standard period (for example, for audit or quality purposes). On the other hand, some Customer organizations will determine that they are unable to justify retaining Interaction Content for the standard retention period and require a shorter period.

As Interaction Content can contain Personal Data, retention periods should be balanced against the storage limitation principle. Vonage's standard retention periods are set with the storage limitation principle in mind.

The availability of extensions and reductions to standard retention periods are further described in this Service Description.

Vonage establishes safe and secure destruction procedures following the expiry of a standard or amended retention period. Vonage also provides Customers with the ability to self-delete Interaction Content sooner than the established retention period.

Ultimately, upon termination or expiry of our Agreement, Interaction Content will be available to retrieve or download for a period of 30 days. Thereafter, Vonage will permanently delete all Interaction Content in accordance with its destruction procedures (see Section 3.3)

This Service Description applies to VCC Accounts in production and sandbox (if applicable).

2.1 Interaction Content

In the ordinary course of usage, the VCC Platform captures the content of certain interactions that take place across the platform. The retained content may be accessed by you or us for a variety of reasons, such as quality management, auditing, delivering or receiving customer or support services and legal or regulatory compliance. The types of content captured and managed on the VCC Platform are:

- Call Recordings;
- Conversation Transcripts; and
- Categorization Results.

(together "Interaction Content")

Interaction Content is managed according to the Contracted / Retention Periods for Interaction Content section below.



3. VCC Data Retention

Note: Data Retention was formerly known as "Call Recording Retention / CR Retention"

3.1 Contracted / Retention Periods for Interaction Content

Contracted Retention Periods and Retention Periods are defined terms (see above).

3.2 Contracted Retention Periods

Contracted Retention Periods for Interaction Content are defined by: (i) the VCC package subscribed to (see <u>Standard Inclusive Retention Periods for Interaction Content</u> below); (ii) any extensions subscribed to; (iii) any reductions formally documented and/or (iv) as may be defined in the Special Conditions section of a relevant Order.

Extensions to the Contracted Retention Periods for Interaction Content are available to purchase (see <u>VCC Data Retention Extension</u>)

It is important to note the following:

- Contracted Retention Periods and Retention Periods are rolling periods and Interaction Content falling outside the relevant period will be deleted from the VCC Platform.
- It is not possible to subscribe to or set multiple retention periods per VCC Account; one retention period applies per VCC Account.
- Any decrease to a Contracted Retention Period or Retention Period will apply across all Interaction Content including historic Interaction Content that was retained under a longer retention cycle prior to the new decreased setting.
- Any increase to Contracted Retention Periods or Retention Periods will apply to Interaction Content moving forward and to historic Interaction Content that is being retained within a current retention cycle.
- Any subscription to an extension to a Contracted Retention Period will require the Administrator to validate the increased Retention Period via the VCC Portal.
- An Administrator is authorised to effect early deletions of Interaction Content (sooner than the Contracted Retention Period).
- Any reduction to a Contracted Retention Period will not entitle the Customer to a refund.

3.3 Interaction Content upon Termination or Expiry of the Agreement

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Upon termination or expiry of the Agreement, Vonage will make Interaction Content available to the Customer as follows:

- All Interaction Content via the Interaction Content API for a period of 30 days; and
- Call Recordings only, upon a written request by Customer made within 30 days after the date of termination or expiry of the relevant Agreement, downloaded via a secure FTP (SFTP) site.

After the 30-day period, Vonage will have no obligation to maintain or provide Interaction Content to the Customer and will thereafter delete such data from the VCC Platform.

3.4 Standard Inclusive Contracted Retention Periods for Interaction Content

For **Vonage Contact Center** user subscriptions Standard Contracted Retention Periods for Interaction Content are:

Package	Express	Essentials	Select	Premium	Unlimited
Number of Days included in package	30	90	180	365	1095 (3 years)

For Vonage Contact Center Bundled with VBC user subscriptions:

Package	VCC Bundled with VBC Express	VCC Bundled with VBC Elevate
Number of Days included in Package	30	90



4. Retention Extension

Retention Extensions are available in subscription in 1 year (365 day) increments. Upon completion of an order with Vonage, increases to the standard inclusive Contracted Retention Periods are applied in accordance with the following examples:

4.1 Legacy Model

For existing Customers whose VCC subscriptions commenced prior to September 14, 2018, extensions are available for 1, 3 or 7 years.

Examples:

Package	Extension required	Included in package (days)	Total retention including extension (days)
Express	1 year	30	395 (30 + 365)
Essential Standard (legacy package)	3 years	90	1185 (90 + 1095)
Select	1 year	180	545 (180 + 365)
Premium Advanced (legacy package)	nced (legacy		1460 (365 + 1095)
Unlimited	1 year	1095	1460 (1095 + 365)



4.2 Yearly Extension Mode

For Customers whose VCC subscriptions first commenced on or after September 14, 2018, the following options are available:

4.3 Retention Extension to 1 Year (1st year only)

For Express, Essentials and Select package levels: to achieve one (1) year's retention, Customers are required to subscribe to an extension to the Inclusive Retention Period (Column A + B = C).

Examples:

	А	В	с
Package	Inclusive Retention Period (days)	To achieve one (1) year	Total Extended Retention Period (days)
Express	30	Subscription to "Data Retention Extension to 1 year (1st year only)"	365
Essential Standard (legacy)	90	Subscription to "Data Retention Extension to 1 year (1st year only)"	365
Select	180	Subscription to "Data Retention Extension to 1 year (1st year only)"	365
Premium	365	Extension to 1 year (1st year) is not required as Premium already includes 365 days of retention	365
Unlimited	1095	Extension to 1 year (1st year) or a total of 3 years are not required as Unlimited already includes 1095 days (3 years) of retention	1095



4.4 Data Retention Extension - 2 or more additional years

To achieve an extension of 2 years or more, Customers are first required to subscribe to an extension for year 1 (as outlined in the previous section), and then subscribe to additional year(s), as needed. (Column A + B + C = D).

Examples:

		А	В	C	D
Package	Desired Retention Period	Inclusive Retention Period (days)	To achieve one (1) year	To achieve desired retention period	Total Extended Retention Period (days)
Express	3 years	30	Subscription to "Data Retention Extension to 1 year (1st year only)"	Subscription to "Retention Extension - two (2) additional years)"	1095
Essential Standard (legacy package)	2 years	90	Subscription to "Data Retention Extension to 1 year (1st year only)"	Subscription to "Retention Extension - one (1) additional year"	730
Select	3 years	180	Subscription to "Data Retention Extension to 1 year (1st year only)"	Subscription to "Retention Extension - two (2) additional years)"	730
Premium	1 year	365	Not required	-	365
Unlimited	2 years	1095	Not required	Not required as Unlimited includes 3 years	730
VCC Bundled wi	VCC Bundled with VBC				
VCC Bundled with VBC - Express	2 years	30	Subscription to "Data Retention Extension to 1 year (1st year only)"	Subscription to "Retention Extension - one (1) additional year"	730
VCC Bundled with VBC - Elevate	2 years	90	Subscription to "Data Retention Extension to 1 year (1st year only)"	Subscription to "Retention Extension - one (1) additional year"	730



4.5 Custom Retention Extension Configuration

As defined in the Special Conditions section of a relevant Order.

4.6 Retention Extension - Rules for Mixed User-Types

If multiple VCC package types or levels are applied to a single VCC Account, then the longest defined Contracted Retention Period applies (subject always to Customer changes made via the VCC Portal) as follows:

Package Levels and Types	Data Retention Applied	Example
Mixed package level for Sales		one sales team uses Express, another sales team uses Select. 180 days of contracted data retention for all sales users.
Mixed package level for Service	Data Retention package of the highest-level package applies	one service team uses Essentials, another sales team uses Premium. 365 days of contracted data recording retention for all service users.
Mixed package level for Sales and Service		service team use Express, sales team uses Select. 180 days of contracted data recording retention for all users on both teams.



5. Enabling Automatic Deletion via VCC Portal

Within VCC Portal, the "Data Retention" configuration component provides the ability to:

- Set alternative Retention Periods for Interaction Content (which may also affect historical Interaction Content)
- Temporarily pause automatic deletion
- Enable deletion sooner than the Contracted Retention Period

5.1 Setting a Retention Period for Automatic Deletion

A Retention Period equal to or less than the Contracted Retention Period can be set by the Administrator (per VCC Account).

The Retention Period set by an Administrator for the purposes of Automatic Deletion does not affect the Customer's ability to later increase Automatic Deletion in line with their Contracted Retention Period. Contractual Retention Periods are unaffected by any VCC Portal setting change.

When Confirming the number of days for Data Retention the following principles and terms apply:

- A value set lower than the Contracted Data Retention does not entitle the Customer to a refund.
- Retention setting changes made by the Administrator will trigger a 30-day verification period, allowing other Administrators (if any) to review the change.
- After the 30-day verification period the Retention Policy configured by the Administrator is final and used for the purposes of deletion. Future and historic Interaction Content will be deleted from the VCC Platform based upon the updated setting.
- Any changes to a Retention Policy during the verification period will reset the 30-day verification period.
- A minimum 2-step Confirmation process will apply when setting or Accepting the Retention Period.
- Customer is fully responsible for the action taken by its Administrator. The set Retention Period will apply across the entire VCC Account and it is the Customer's sole responsibility to ensure that its Authorised Users, parent, affiliated or subsidiary companies locally and abroad are not affected.
- Vonage is not responsible for any action taken by the (Customer's) Administrator whether accidental, negligent, malicious or fraudulent and shall not challenge the Administrator to verify their identity on the assumption that the Administrator is authorised by having access to the VCC Portal.
- Customer holds Vonage harmless against any claims that the Administrator was not authorised to set or Accept the new Data Retention Period.



5.2 Pausing Automatic Deletion

A Customer may 'pause' Automatic Deletion for 30 days via the VCC Portal. Pausing Automatic Deletion is immediate and affords an opportunity to purchase additional Data Retention, or download Interaction Content (examples).

After the 30-day pause, Vonage reserves the right to re-enable Automatic Deletion of Interaction Content in accordance with the Contracted Retention Period associated with the Customer's relevant VCC Account.

5.3 Deletion

A deletion request can be confirmed by 'Click-to-Accept' which shall apply and constitute the Customer's documented instructions to Vonage to perform an Automatic Deletion.

Once deleted from the VCC Platform, it is not possible to retrieve Interaction Content.

Vonage is entitled to decline a request to delete Interaction Content if it is legally obliged by subpoena, legal hold, changes in Applicable Law or regulations requiring Vonage to retain such data.