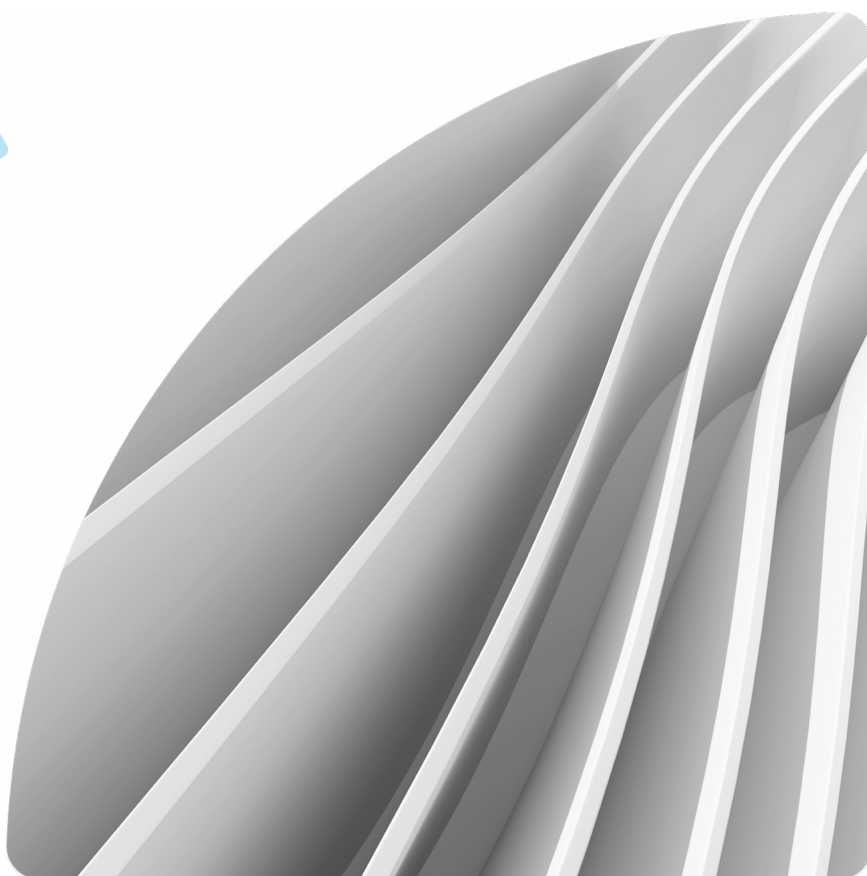


RingCentral as a data controller



Customers often ask for more information regarding our processing activities and whether we process customer data as a data controller or a data processor, as defined by GDPR. We have determined that RingCentral operates as a data controller and a data processor. We operate as a data controller with respect to certain processing activities of usage data. This is necessary for us to comply with applicable laws, to manage our operations including billing purposes, and to improve our services to our customers.



What data does RingCentral process as a data controller?

RingCentral processes usage data as a data controller. Usage data, generally, is metadata relating to communications and could include phone numbers, dates, time, and types of communication (e.g., phone call, message, fax, etc.).

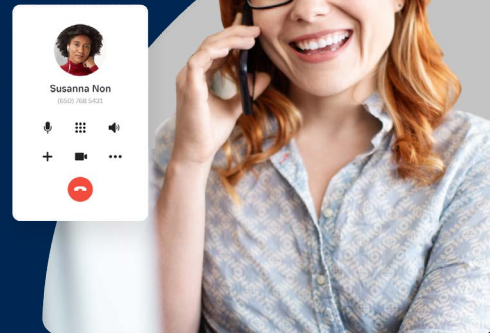
What is usage data?

Usage data is data about the use of the RingCentral services. This may include personal data such as:

- Internet Protocol (IP) address, MAC address, unique device ID (UDID), device type, operating system type and version, client version, type of camera, microphone or speakers, connection type and related information;
- User feedback ratings, internal feature usage analytics, usage logs, cookie identifiers;
- Traffic data about the communications that take place through our platform (such as chat and video conferencing), network monitoring data;
- Call detail records produced by a telephone call or other telecommunications transactions (the record contains various attributes of the call, such as time, duration, completion status, source number, and destination number);
- Fraud data such as blacklist history and security logs;
- Metadata such as session logs and join & leave time of participants;
- Log data including IP address, Internet Service Provider (ISP), browser type, referring/exit pages, operating system, date/time stamp, and/or clickstream data; and
- Publicly available data from customer accounts.

What is the legal basis for RingCentral to process usage data as a data controller?

RingCentral has a legitimate interest to process usage data to provide electronic communications services. It has long been acknowledged and accepted that electronic communications services may process certain personal data as a data controller.



The European Data Protection Board (EDPB) explicitly adopted and deemed as relevant under the GDPR¹ the following, which was previously included in Recital (47) of Directive 95/46/EC:

“Providing an electronic communications service such as an electronic mail service involves processing of personal data. The provider of such services will normally be considered a controller in respect of the processing of personal data that is necessary for the operation of the service as such (e.g., traffic and billing data). If the sole purpose and role of the provider is to enable the transmission of email messages, the provider will not be considered as the controller in respect of the personal data contained in the message itself. The controller in respect of any personal data contained inside the message will normally be considered to be the person from whom the message originates, rather than the service provider offering the transmission service.”

1. See EDPB Guidelines 7/2020 on the concepts of controller and processor in the GDPR, Version 2.0, adopted on 07 July 2021, pages 12–13.

What are the purposes for which RingCentral processes usage data as a data controller?

RingCentral processes usage data as a data controller as necessary for the operation of the services and when required by applicable law. Specifically, RingCentral's purposes for processing usage data as a data controller are to:

- Optimize user experience using RingCentral's website, apps, and services;
- Respond to requests for support;
- Provide customers dashboards and reports;
- Conduct fraud and threat analysis;
- Perform billing for the RingCentral services;
- Monitor performance of data centers and networks;
- Conduct analytics to improve RingCentral's website, app and service performance;
- Personalize users' experience with our websites, apps, and services—for example, providing users with disclosures appropriate to their location; and
- Comply with applicable laws, including those regulating call detail records.

How does RingCentral comply with GDPR Articles 13 and 14 in its role as a data controller?

RingCentral complies with GDPR Articles 13 and 14 through our online privacy notices:

- ringcentral.com/legal/last-update-August-26-2020/privacy-notice
- ringcentral.com/legal/childrens-privacy-notice-school-parental-notification

Are RingCentral and the customer joint controllers of the usage data?

Joint controllers jointly determine the purposes and means of a processing activity, whereas independent controllers separately and independently determine the purposes and means of a processing activity. Even if the processing activities are performed on the same set of data, RingCentral and our customers are independent controllers as each party has a separate and independent legal basis to control the purposes and means of processing. The purposes for which RingCentral processes usage data are necessary for RingCentral's own legitimate business interests and to comply with applicable law. Thus, RingCentral cannot determine the purposes and means for such processing jointly with each of our customers.

As a data controller, does RingCentral have unlimited rights to usage data?

RingCentral does not acquire unfettered rights to the usage data, but instead is bound by our commitments to customers and by the purposes for which we collect, use, and process data as described in our privacy notices. Further, by processing as a data controller, we are bound by the obligations governing data controllers under GDPR, including the requirement to have a legal basis for processing.

What protective measures has RingCentral implemented to protect usage data?

RingCentral complies with applicable laws when processing usage data as a controller. To protect usage data, RingCentral has implemented technical, organizational, and contractual safeguards, including retention policies and encryption, employee training and incident response plans, and data processing agreements with our subprocessors, etc.

For more information, please see RingCentral's [Information Security Addendum](#).

For more information about this white paper, please contact privacy@ringcentral.com.

Please note that the information in this document on legal or technical subject matters is for general awareness only and does not constitute legal or professional advice, or warranty of compliance with applicable laws. The content of this document may be subject to change.

RingCentral

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