RingCentral Data Request Guidelines

Last updated May 9, 2017

This document describes procedures law enforcement authorities and individuals involved in civil litigation should follow to request data from RingCentral, Inc. and its corporate affiliates ("RingCentral").

These guidelines are provided for informational purposes only and do not represent a commitment by RingCentral to provide information. RingCentral also reserves its rights to require reasonable reimbursement in connection with its responses to data requests. RingCentral may revise these guidelines and the underlying processes at any time without notice. Contact RingCentral at subpoenarequest@ringcentral.com to request the latest version of these guidelines.

RingCentral reserves the right to respond or object to any request for data in any manner consistent with applicable law.

Private litigants are strongly encouraged to seek any and all Data directly from the RingCentral Customer or End User, who can use automated account tools to download the relevant Data from their RingCentral Admin Portal.

For your convenience you may download a copy of these RingCentral Data Request Guidelines here.

I. RINGCENTRAL'S COMMITMENT TO ITS ACCOUNT HOLDERS

In order to maintain the privacy and trust of our Customers, we strive to ensure that our policies and practices provide clarity, when it comes to their personal information. In keeping with this commitment to our Customers, we respond to requests for customer data in accordance with our Terms of Service (see https://www.ringcentral.com/legal/eulatos.html) and our Privacy Notice (see https://www.ringcentral.com/legal/privacy-notice.html). RingCentral may not respond to requests for information that violate established legal processes.

II. DATA REQUESTS

RingCentral only considers the following types of requests pursuant to formal legal processes. For Customers or End Users requesting copies of their own data please refer to the RingCentral Individual's Rights and Complaints Handling Procedure.

A. Data Requests:

A Data Request is a request for information relating to a RingCentral customer account in connection with an official criminal or administrative investigation or proceeding, or a filed civil legal action.

Customers or End Users who need copies of their own data should download that data through their Admin Portals, rather than submitting Data Requests to RingCentral. Customers or End Users needing support in navigating their Admin Portals should contact Ring Central Customer Care Center (https://success.ringcentral.com/). RingCentral will comply with a Data Request sent from a Customer or End User only where required by law and after a showing that such data cannot be obtained through the Admin Portal (and RingCentral may require reimbursement as set forth in Section XI).

Except in very limited exigent or emergency situations (see sub-section C below), RingCentral generally will not respond to Data Requests unless they are made through formal legal processes and procedures. Examples of legal processes that may serve as the basis for a Data Request include the following:

- Subpoenas
- Court Orders
- Search Warrants
- Civil Investigative Demands

B. Preservation Requests:

A Preservation Request asks RingCentral to preserve customer account data in connection with an official criminal or administrative investigation or proceeding. Preservation Requests must include all of the information outlined in Section V (Information to Include in Data Requests) below.

In response to a Preservation Request, RingCentral will generally agree to preserve a one-time snapshot of the then-existing account data that the Preservation Request specifies for ninety (90) days, pending service of formal legal process and provided the requestor agrees to the fees schedule set forth herein.

On the ninety-first (91st) day the preserved data may be deleted unless the requestor has provided a formal Data Request in the interim. Any production of preserved data will be subject to the timelines and fees outlined in these guidelines, which may include an additional fee for any such preservation.

A Preservation Request will not result in RingCentral recovering customer data that has already been deleted. RingCentral is not able to recover customer data once it has been deleted.

C. Emergency Requests:

Emergency requests for customer Data will not be considered unless they are made using the Emergency Data Request Form (see attached) or are made in connection with a Court Order. Emergency Requests (if made without a Court Order) are only appropriate in cases involving the risk of serious bodily harm or death, and (absent a Court Order) RingCentral responds to such Requests only when RingCentral believes that such harm may be imminent if we do not respond.

III. SERVICE OF PROCESS FOR DATA REQUESTS

RingCentral will review and respond to properly served request for data as required by law and in accordance with its Terms of Use and Privacy Notice.

RingCentral may object to requests for data for any reason and will object if they are deemed by RingCentral to have been improperly served, are overly broad or vague, or unduly burdensome.

A. Service of Process by Law Enforcement:

As a courtesy to law enforcement, RingCentral accepts service of subpoenas, warrants, court orders, and governmental civil investigative demands or related legal process which do not require the oral testimony or personal appearance of a RingCentral representative, via email at subpoenarequest@ringcentral.com, with a copy by any means authorized under the Federal Rules of Civil Procedure or California State Law on RingCentral's registered agent for service of process: InCorp Services, Inc., 5716 Corsa Ave., Suite 110, Westlake Village, CA 91362-7354. Acceptance of service of process by email is strictly voluntary and may change at any time and without notice.

RingCentral does not consent to service by fax or email for subpoenas, warrants, court orders, and civil investigative demands or related legal process seeking oral testimony or the personal appearance of a RingCentral representative. RingCentral requests personal service on RingCentral's registered agent for service of process of legal process seeking oral testimony or the personal appearance of a RingCentral representative.

D. Service of Process in Civil Matters

All service of process in civil matters should be localized through the California state or federal courts, as applicable, and conform to the laws of the State of California.

IV. ADDITIONAL RESTRICTIONS AND TERMS:

To the extent permitted by law, RingCentral reserves the right to require payment in advance of any production related to a Data Request; to withhold delivery of information until payment is received; and to seek enforcement of charges, including the cost of collection, through collections agencies, and any other means necessary and available under applicable law.

V. INFORMATION TO INCLUDE IN DATA REQUESTS

RingCentral's databases are not designed to enable any kind of search a requestor might desire. In addition, certain features of RingCentral's business make many common search requests virtually worthless. For example, RingCentral allows its customers to add or drop telephone numbers from their accounts through their Admin Portal at any time and as often as they like. As a result, a given telephone number may be assigned to many different users over a comparatively short period of time. Thus a request for information relating to a given telephone number is (unless targeted to a very short period of time) highly likely to relate to more than just the user(s) who are relevant to the Data Request and impinge on the privacy rights of those users. For these reasons, RingCentral cannot reasonably consider a Data Request unless it includes at least the following information:

- Telephone Number or User Identification Number ("UID")
- A specific date or a narrowly tailored date range (generally up to 2 months).
- Any other potentially identifying information (for example a customer's name, physical address, email address) in the possession of the Requestor.
    - Please note that RingCentral customers register through an online portal and their names, addresses and other contact information are not verified or regulated by RingCentral in any way. As a result, (a) in some cases the identifying information provided by a requestor may not be used in a search and (b) searching by user name may be unreasonably overbroad so RC may require the requestor to provide narrower criteria (E.g., RingCentral has thousands of accounts with first name: "Customer" and last name "Service").

A. Law Enforcement Data Requests

To enable RingCentral to verify that a data request is from an official law enforcement agency or authority, RingCentral requires that each law enforcement request include at least the following information:

- Requesting Agency's Name
- Requesting Agent's Name
- Requesting Agent's Badge/Identification Number

- Requesting Agent’s Employer-Issued E-mail Address (RingCentral will not respond to an individual’s private email address or any e-mail address in a domain unassociated with the Requesting Agency)
- Requesting Agent’s Telephone Number (including extension)
- Requesting Agent’s Mailing Address (P.O. boxes will not be accepted)
- Requested Response Date (please allow at least 2 weeks for processing)

E. Civil Data Requests

The following contact information is required for the requesting party and its counsel of record:

- Requesting Party’s Name
- Counsel Name and applicable State Bar Number
- Local Counsel Name and California State Bar Number
- Telephone Number
- E-mail Address
- Mailing Address (P.O. boxes will not be accepted)
- Requested Response Date (please allow at least 4 weeks for processing)

Private litigants are strongly encouraged to seek Data directly from the RingCentral Customer or End User, who can use automated account tools to download the relevant Data from their RingCentral Admin Portal.

F. Time for Response

Requests are generally handled in the order received, subject to other pending expedited requests, with law enforcement requests given priority.

Expedited responses for data, if available resources permit, will be provided on a case-by-case basis and are subject to a fee for expediting the response, where permitted by law.

Response times will be commensurate with the size and complexity of the request; generally a response may be expected within thirty (30) days.

G. Responsive Information

Responsive information is generally returned via e-mail in the form of a compressed, password protected file; however, if the volume of returned data is larger than a few megabytes, we may place the compressed, password protected file for download via a secured RingCentral Box account or FTP server.

VI. TYPES OF INFORMATION AVAILABLE IN RESPONSE TO DATA REQUESTS

A. Information RingCentral Can Provide

Depending on the type of legal process validly issued and served upon RingCentral, we may be able to respond with one or more of the types of data set forth in this Section.

It is important that RingCentral protect its customer information not only as indicated in our Terms of Service and Privacy Notice but also in accordance with state, federal, and international data protection and communications laws. Disclosure of some types of Data is more highly restricted by law and may only be disclosed in response to certain types of entities or with specific types of legal process.

Governmental Requests: in response to a Data Request from a government entity, which is validly served and supported by sufficient legal process, RingCentral may provide Basic Subscriber Information, Billing History Information, Additional Number or Extensions, Call Log Data, Fax Log Data, SMS Log Data, Comment Log Data, and Content of Communications. These types of information are described in more detail below.

Civil Requests: in response to a Data Request from a private litigant, which is validly served and supported by sufficient legal process, RingCentral typically may provide Basic Subscriber Information, Billing History Information, Additional Number or Extensions and Comment Log Data (not Call/Fax Logs, SMS Message Records, or Media) provided that the request is properly limited in scope.

Private litigants: are strongly encouraged to seek Call Logs, Fax Logs, SMS Logs, or the Content of Communications directly from the RingCentral Customer or End User, who can use automated account tools to download the relevant Data from their RingCentral Admin Portal.

Each of these classes of information is described further below. Keep in mind that while RingCentral is often able to provide the sorts of data above, it cannot guarantee that this will be the case for your data request. Each customer’s circumstances are unique; information that is readily accessible or useful in some cases may not be in others.

The production of Call Logs, Fax Logs, and SMS Logs is frequently unduly onerous, and RingCentral may object to the production of these records to private litigants. Additionally, RingCentral is typically prohibited from producing the Content of Communications to private litigants.

The Fees associated with the production of each of these categories of records is outlined in Section XI (Cost Reimbursement).

B. Basic Subscriber Information

A report which shows basic subscriber information including, to the extent RingCentral's customer completed the fields upon registration, the following information:

- Customer's First and Last Name
- Contact Telephone Number
- Company Name, if applicable
- Physical or Mailing Address (Street, City, State, and Zip Code)
- Email Address(es)
- Date of Account Signup and Next Billing or Deactivation Date

H. Billing History Information

A report which gives very basic information in the form of line items transactions:

- Date of Transaction
- Transaction Reference Number
- Amount of Transaction
- Payment Method (including the last 4 digits of a credit card1 or Indication of Invoice Billing)
- State of Transaction (Success or Failure)

I. Additional Numbers or Extensions

A list of all other phone numbers associated with the same account. This report shows the number and the date it was added to the customer's account; it also shows the underlying provider of the number (for example, Level3 or Bandwidth).

J. Comment Logs

A "comment log" report lists of activities that are associated with an account and are logged by RingCentral employees. Each logged activity has a date/time stamp and a brief description of the activity performed. Note that there is substantial variation in the quality and content of comment logs.

K. Call/Fax Log Records

A document in substantially the same format as traditional call detail records, although there are slight differences because RingCentral's systems are cloud-based. RingCentral delivers Call and Fax Log Records in the form of a comma-separated value (CSV) file.

L. SMS Log Records

A report that includes substantially the same information as Call/Fax Log Reports. RingCentral delivers SMS Message Logs in the form of a CSV file.

M. Content of Communications

Depending on the scope of the request), RingCentral may be able to provide various communications content (listed below):

- Faxes
- Incoming Voice Messages
- Content of SMS Messages
- Call Recordings
- Glip data

RingCentral delivers the Content of Communications in multiple formats as follows:

- Faxes will be delivered as PDF formatted files
- Incoming Voice Messages and Call Recordings will be delivered as either MP3 or WAV format files, depending on how our customer has their account setup
- Content of SMS Messages will be delivered in a CSV file
- Glip Data will be delivered in JavaScript Object Notation (JSON) format

VII. RINGCENTRAL'S DATA RETENTION PERIODS

RingCentral takes reasonable and appropriate steps to guard against inadvertent or malicious deletion or destruction of data in its systems. RingCentral provides information about its data retention policies for general informational purposes only, and does not commit to retaining all information as described below. For more information please refer to RingCentral Records Retention Policy.

RingCentral's retains information related to our customers' accounts in accordance with the following data retention schedules and subject to the automated deletion cycles listed below. RingCentral normally deletes or de-identifies all data from a customer's account within 30-45 days of account closure. In addition, customers have the ability to delete numerous types of data for their accounts, such as voicemails and faxes. The following retention periods generally assume the customer has not deleted the data from its account. RingCentral is not able to recover customer data once it has been deleted.

RingCentral retains data for all accounts as follows:

Basic Subscriber Information	For as long as needed to provide services to the customer and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Billing History Information	
Additional Numbers of Lines Associated with a Given Account	
Comment Log and Records of Activity	
Call/Fax Log Records	

Other data is retained depending upon whether the customer's account is set up as a HIPAA account.

Data Retention for Accounts

Incoming Faxes and Voice Messages	200 Total, then begin deleting oldest Message
Outgoing Faxes	30 Days
SMS Messages	5,000 Messages, then begin deleting oldest SMS Message
Call Recordings	90 Days
Sent Faxes	30 Days
Glip Data	Set by individual customers at any interval between twenty-four (24) hours and up. Notwithstanding the forgoing, RingCentral only maintains such information for as long as needed to provide services to the customer and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

VIII. NOTIFICATION OF CUSTOMERS

RingCentral's notifies its customers of Data Requests unless precluded from doing so by law or court order. Law enforcement officials who believe that notification would jeopardize an investigation should obtain an appropriate court order or other valid legal process that

specifically prohibits customer notification **prior** to sending a Data Request or Preservation Request to RingCentral. When a Data Request is accompanied by a nondisclosure order, RingCentral will notify the affected customer(s) as soon as the order is overturned or expires.

Please note that nondisclosure orders should be as narrow in scope and duration as circumstances permit, and that RingCentral does not provide advance notice to the requesting party that a nondisclosure order is expiring; it is up to the requesting party to calendar the nondisclosure period and to keep RingCentral apprised of any modifications or extensions.

If your Data Request draws attention to an ongoing violation of our Terms of Service, or Privacy Notice we may take action to prevent any further abuse in order to protect the network, comply with our legal obligations and/or protect other RingCentral customers. This may include actions that could (explicitly or implicitly) notify the customer that we are aware of his or her misconduct.

IX. NON-US REQUESTS

At the present time, a Mutual Legal Assistance Treaty (MLAT) Request or letter interrogatory is typically required for disclosure of Data in connection with a non-United States Data Request.

X. QUESTIONS/STATUS REQUESTS:

Questions regarding the RingCentral Data Request Guidelines should be directed to: subpoenarequest@ringcentral.com. For security reasons, RingCentral will only respond to questions submitted in writing.

To prevent delays in response to your Data Request and those of others, please allow RingCentral ten (10) business days to respond to your request before you inquire as to its status.

XI. COST REIMBURSEMENT:

To cover the cost of compliance to RingCentral, RingCentral requires payment of the following fees, to the extent allowable by law, for all Data Requests, regardless of format or requesting party. RingCentral may charge additional fees for especially burdensome requests or requests not covered in the tables below

$50.00	Per account for any combination of the following: • Basic Subscriber Information • Billing History Information • Additional Number or Extensions

	• Comment Logs
$100.00	Per account for: • Preservation, and/or • Expedited Handling, if available
$40.00/Month	Call/Fax Log Records per account
$40.00/Month	SMS Log Records per account
$80.00/Month	Per Content of Communications Type: • Faxes • Content of SMS Messages • Voice Messages ◦ Call Recordings
$250.00/hour/Engineer	Glip Data • Requests requiring more than 0.5 hours will be billed at a one- (1-) hour minimum
$0.25/Page	Photocopies and facsimiles exceeding ten pages
$60.00 for travel and $10 per signature	Per notarized document request (i.e. affidavit)
$190.00/hour/Paralegal Time $250.00/hour/Engineer Time $450/hour/Attorney Time	Requests requiring more than 0.5 hours will be billed at a one- (1-) hour minimum.
Pen Register/Trap and Trace	RingCentral's actual cost
Wiretap	RingCentral's actual cost

Payment methods	
Check:	Make payable to RingCentral, Inc. (Tax ID # 94-3322844)

	Mail to: • RingCentral, Inc. • Attn: Subpoena Response • 20 Davis Drive, • Belmont, CA 94002 Please indicate “Subpoena Request” and your Invoice Number on the check. *A $45 fee will be charged for any returned checks.
ACH or Wire Transfer	Contact RingCentral Accounts Payable Monday through Friday between the hours of 9:00 am and 4:00 pm Pacific Time. Telephone: 415-649-6735 Please have your Invoice Number ready to provide to the RingCentral representative.