

# RingCentral AI Conversation Expert Service Privacy Data Sheet

At RingCentral, we take the protection of personal data seriously and have created this document to describe how RingCentral processes personal data when providing AI Conversation Expert and AI Quality Management (collectively, the “Service” or “AI Conversation Expert”). The purpose of this document is to help our customers and partners understand how the Service complies with privacy requirements and to provide background information that may be helpful to perform privacy reviews or privacy impact assessments of our Service.



## Service Description

AI Conversation Expert can be added to the RingCentral services, including RingEX and RingCX. The Service leverages generative artificial intelligence (AI) to deliver AI-driven enhancements on recorded calls between AI Conversation Expert users and external participants. AI Conversation Expert can integrate with recording sources of the customer’s choice, including RingEX or RingCX.

## Data Subjects

The Service is optional and configurable. Customer system administrators activate AI Conversation Expert and can add or remove AI Conversation Expert users, which includes RingCentral customers’ agents and managers (“AI Conversation Expert Users”), to and from the Service. The other data subject category is the AI Conversation Expert guest, (“AI Conversation Expert Guest”) which includes the external participants such as the end prospect or customer speaking with a AI Conversation Expert User.

## Data Collection

The Service collects and analyzes customer-recorded meetings between our customers and their external guests directly from the recording sources chosen by the customer. For example, if the customer chooses to integrate AI Conversation Expert with RingEX, then AI Conversation Expert will create a copy of the recordings directly from RingEX. The Service then converts the meeting from voice or video to text, and performs an analysis on the recording and the resulting text transcript to generate the AI Conversation Expert insights.

The Service processes only the recordings of AI Conversation Expert Users enrolled in the Service. The customer admin can choose certain settings to determine which calls of AI Conversation Expert Users are processed. For example, customer admins can disable processing of recordings with a certain domain. Moreover, AI Conversation Expert Users may pause or stop a recording upon request of any participant and that meeting will not be processed by AI Conversation Expert.

## Categories of Personal Data Processed by the Service and Purpose of Processing



Categories of personal data processed include Service account data, Service usage data, and customer-generated content. The details of these data categories, including the AI inputs and outputs, for each category of data subject and the purposes of processing are provided in Annex 1.

### **Special Categories of Data Processed by the Service**

The Service is not designed to process or use biometric data or voiceprints. The Service uses a RingCentral User's ID, where available, to associate the content of the communication and does not rely on voiceprint or other biometric identifiers to identify the participants.

The Service is not designed to recognize and/or classify data as:

- special categories of data or sensitive data (as defined in the GDPR or in other applicable data protection laws)
- personal data concerning children or minors
- data related to criminal convictions and offenses

Insofar as customers process special categories of personal data, customers undertake to process these categories of personal data lawfully, and in particular to rely on a valid legal basis in accordance with applicable data protection laws.

### **Use of Artificial Expert**

AI Conversation Expert uses its own proprietary AI models in combination with third-party AI services to provide the Service. Please see our [subprocessor list](#) for more information about third-party AI services and our [AI whitepaper](#) for more information regarding RingCentral's approach to trustworthy AI.

RingCentral does not use customer personal data to train its models. RingCentral does not allow third parties to use customer personal data to train their AI models. Where available (including through the subprocessor), RingCentral implements a zero data retention policy, whereby the requests and responses are not persisted to any logging mechanism and exist only in memory in order to serve the request. Where available, customers may fine-tune the output of the AI model for their account by providing direct feedback to the AI model.

AI Conversation Expert provides conversational intelligence which, once applied to the data in Annex 1, generates the outputs described in Annex 1. For example, AI Conversation Expert processes the meeting recording and resulting transcript to (1) create metrics including rate of filler words used, ratio of talk vs. listen, etc. to allow AI Conversation Expert Users to identify coaching opportunities (2) suggest follow-up activities or automate tasks, and (3) categorize questions and answers. For more information on the logic used to generate each particular output, please refer to the "tooltips" (i) in the AI Conversation Expert dashboard. AI Conversation Expert provides managers the ability to edit outputs such as scorecards and feedback.

Once the outputs have been generated, AI Conversation Expert aggregates and clusters these outputs (i.e., metrics) for each AI Conversation Expert User to create coaching insights based on the User's metrics for the preceding month. Managers are also able to edit the aggregated insights generated for each AI Conversation Expert User.

### **Data Sharing and Third-Party Integrations**



The customer may elect to implement a third-party integration in which case the customer administrators can configure what data is pushed to and pulled from the third-party integration.

## **Access**

### *Restricted Administrative Access by RingCentral*

Access to personal data is restricted to provide the Service (i.e., for customer support troubleshooting and remediation, Service monitoring, product improvement, network management, network monitoring, and to provide customer analytics). Strong access control mechanisms are employed which limit access to personal data to only those trained and authorized RingCentral and subprocessors' personnel who have a business need to access said data to enable RingCentral Services. Such controls include multi-factor authentication (MFA), which is implemented for administrative access to the production environment, and Identity Access Management (IAM), which tightly controls access to RingCentral production environments.

### *Access by Customer Administrators and End Users*

Customers can access data regarding the Service, including personal data, directly through the dedicated portal to administer user accounts and retrieve, update, or delete end users' personal data. AI Conversation Expert Users may access certain personal data on the Service from the ServiceWeb portal.

## **How RingCentral Service Data Processing Fits with Data Protection Laws**

### *Data Subject Rights*

The Service provides technical means to enable customer administrators to take appropriate actions in response to requests from data subjects exercising their privacy rights. In addition, if end users submit a request through the [RingCentral Data Subject Request Center](#), we will direct them to contact the customer to exercise their rights.

### *Subprocessors*

RingCentral uses other RingCentral affiliates and third-party service providers to assist in delivering the Service. RingCentral contracts only with third-party service providers that provide equivalent levels of data protection and security as provided by RingCentral.

Please see the [RingCentral Subprocessor List](#) for more detailed information.

### *Data Minimization*

AI Conversation Expert administrators can enable redaction capabilities whereby when AI Conversation Expert transcribes a call recording from speech to text, AI Conversation Expert redacts the following personal data attributes from the transcript: credit card number, email address, bank account number (IBAN code), and phone number. For the US, AI Conversation Expert also redacts the following attributes from the transcript: bank account number, driver's license, taxpayer ID number, passport number, social security number.

### *Data Retention*



Unless deleted by the Customer in the platform, personal data will be retained for up to 12 months during the term of the Service, or as otherwise required by law or agreed with the customers. Upon termination an account will be disabled on the last day of the billing cycle. Once the account is disabled, the account will be deleted within 30 days, unless otherwise agreed with the customers.

### *Transparency*

RingCentral processes personal data both as a controller and as a processor for the purpose of the Service.

The processing activities performed by RingCentral acting as a data controller are subject to the [RingCentral Privacy Notice](#). Additional information related to RingCentral acting as a data controller is provided in our [RingCentral as a Data Controller Whitepaper](#).

The processing activities performed by RingCentral acting as processor on behalf of our customers are governed by the [RingCentral Data Processing Addendum](#) (DPA) incorporated into the RingCentral Master Service Agreement (MSA).

### *Location of Data Storage*

<b>Customer account location*</b>	<b>Service account data</b>	<b>Usage data</b>	<b>Customer-generated content</b>
United States	United States	United States	United States
United Kingdom	United States and United Kingdom	United States and United Kingdom	United Kingdom
Canada	United States and Canada	United States and Canada	Canada
EU	United States and Germany	United States and Germany	Germany
Australia	United States and Australia	United States and Australia	Australia
India	United States and India	United States and India	India

\* The customer account location is determined by the customer's contracting entity.

### *Cross-Border Transfers*

RingCentral may transfer and process customer personal data outside the European Economic Area (EEA), Switzerland, or the United Kingdom, to locations where RingCentral, its affiliates or its subprocessors maintain data processing operations. To the extent that RingCentral processes (or causes



to be processed) any personal data originating from the EEA, Switzerland, or the United Kingdom in a country that has not been recognized by competent authorities as providing an adequate level of protection for personal data, RingCentral relies on the European Commission's Standard Contractual Clauses, its additional safeguards, and the additional Swiss and UK-specific clauses, to transfer such personal data. Please see the [RingCentral Personal Data Transfer FAQ](#) for more information.

With respect to transfers out of the EEA, United Kingdom, and Switzerland to the United States, RingCentral has self-certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles), the UK Extension to the EU-U.S. DPF (UK Extension), and the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles), respectively. Please see our [Notice of Certification](#) for more information.

#### *Automated Decision-Making*

The Service is not designed to make decisions based solely on automated processing, particularly those that produce legal effects on individuals.

#### **Security Measures**

RingCentral is committed to security and has implemented technical, organizational and contractual safeguards to protect customers' data. Please see the RingCentral [Security Addendum](#), [Security Trust Portal](#), and [Security Trust Center](#) for information on the commitments we make to our customers about security.

#### **About This Datasheet**

The information provided in this Datasheet does not constitute legal or professional advice, warranty of fitness for a particular purpose or compliance with applicable laws. RingCentral reserves the right to update this Data Sheet from time-to-time.

## Annex 1 - Categories of Personal Data Processed by the Service and Purpose of Processing

Category of Data Subject	Category of Personal Data	AI Processing	Purpose of Processing
AI Conversation Expert User (customer agents and managers)	<b>Account Data</b> <ul style="list-style-type: none"> <li>Name, email address, phone number, job title</li> <li>Manager's email</li> <li>Profile picture (if provided)</li> <li>User ID</li> <li>AI Conversation Expert account role (e.g., admin vs. non-admin)</li> <li>License type</li> <li>Application settings</li> </ul>	None	<ul style="list-style-type: none"> <li>Set up AI Conversation Expert User accounts</li> <li>Provide access to the Service and associated features</li> <li>Enable provision of the Service</li> <li>Communicate with AI Conversation Expert Users</li> <li>Generate analytics reports as requested by AI Conversation Expert Users</li> </ul>
	<b>Usage Data</b> <ul style="list-style-type: none"> <li>Approximate location (city, region, state)</li> <li>Language</li> <li>Last activity date</li> <li>First-party cookie identifiers</li> <li>Device and OS information (such as device and OS type, operations system and client version, etc.)</li> <li>Account extension ID</li> <li>Meeting metadata (e.g., call queue, whether call was transferred)</li> <li>Call logs (originating and terminating, numbers called date and time)</li> </ul>	None	<ul style="list-style-type: none"> <li>Set up AI Conversation Expert User accounts</li> <li>Provide access to the Service and associated features</li> <li>Enable provision of the Service</li> <li>Communicate with AI Conversation Expert Users</li> <li>Generate analytics reports as requested by AI Conversation Expert Users</li> </ul>

	<p>Activity on AI Conversation Expert Platform</p> <ul style="list-style-type: none"> <li>• Comments, feedback, scorecards</li> <li>• User feedback ratings provided by AI Conversation Expert Users (managers only)</li> </ul>	<ul style="list-style-type: none"> <li>• Comments (input)</li> <li>• User feedback ratings (input)</li> <li>• Human-generated scorecards (input)</li> <li>• AI-generated scorecards (output)</li> <li>• Insights (output)</li> </ul>	<ul style="list-style-type: none"> <li>• Enable provision of the Service</li> <li>• Generate analytics reports as requested by AI Conversation Expert Users</li> <li>• Respond to support requests and provide notifications</li> <li>• Monitor and improve the Service</li> </ul>
	<p>Customer-generated content</p> <ul style="list-style-type: none"> <li>• Customer participants' names</li> <li>• Meeting recordings</li> <li>• Avatars and profile pictures</li> <li>• Meeting name</li> </ul>	<ul style="list-style-type: none"> <li>• Customer participants' names (input)</li> <li>• Meeting recordings (input)</li> <li>• Call logs (input)</li> <li>• Meeting name (input)</li> <li>• Transcription (output)</li> <li>• Summaries (output)</li> <li>• Action items (output)</li> <li>• Highlights (output)</li> <li>• Insights (output)</li> </ul>	<ul style="list-style-type: none"> <li>• Enable provision of the Service</li> <li>• Respond to support requests and provide notifications</li> <li>• Monitor and improve the Service</li> <li>• Generate analytics reports as requested by AI Conversation Expert Users</li> </ul>
	<p>Integration-dependent</p> <ul style="list-style-type: none"> <li>• Calendar events, title, organizer, date, time, location, description, participant list</li> <li>• Email metadata and content</li> </ul>	<ul style="list-style-type: none"> <li>• Email metadata and content (input)</li> </ul>	<ul style="list-style-type: none"> <li>• Enable provision of the Service</li> <li>• Respond to support requests and provide notifications</li> <li>• Monitor and improve the Service</li> <li>• Generate analytics reports as requested by AI Conversation Expert Users</li> </ul>

Category of Data Subject	Category of Personal Data	AI Processing	Purpose of Processing
AI Conversation Expert Guest (external participants)	Guest Data <ul style="list-style-type: none"> <li>Name (if provided)</li> </ul>	<ul style="list-style-type: none"> <li>Name (input)</li> </ul>	<ul style="list-style-type: none"> <li>Enable provision of the Service</li> </ul>
	Guest-generated content <ul style="list-style-type: none"> <li>Meeting recordings</li> <li>Meeting names</li> </ul>	<ul style="list-style-type: none"> <li>Meeting recordings (input)</li> <li>Meeting names (input)</li> </ul>	<ul style="list-style-type: none"> <li>Enable provision of the Service</li> <li>Respond to support requests and provide notifications</li> <li>Monitor and improve the Service</li> <li>Generate analytics reports as requested by customer</li> </ul>
	Usage data <ul style="list-style-type: none"> <li>Call logs (originating and terminating, numbers called date and time)</li> <li>Meeting metadata (e.g., call queue, whether call was transferred)</li> </ul>	None	<ul style="list-style-type: none"> <li>Enable provision of the Service</li> <li>Respond to support requests and provide notifications</li> <li>Monitor and improve the Service</li> <li>Generate analytics reports as requested by customer</li> </ul>
	Integration-dependent <ul style="list-style-type: none"> <li>Customer participants' names</li> <li>Meeting recordings</li> <li>Avatars and profile pictures</li> <li>Meeting name</li> </ul>	<ul style="list-style-type: none"> <li>Email metadata and content (input)</li> </ul>	<ul style="list-style-type: none"> <li>Enable provision of the Service</li> <li>Respond to support requests and provide notifications</li> <li>Monitor and improve the Service</li> <li>Generate analytics reports as requested by AI Conversation Expert Users</li> </ul>