# Mitel MiVoice 6900 Series IP Phones (MiNET) – Personal Data Protection and Privacy Controls

Mitel MiVoice 6900 Series IP Phones – MiNET Release 1.7

Version 1.0

September 2021

#### NOTICE

The information contained in this document is believed to be accurate in all respects but is not warranted by Mitel Networks<sup>TM</sup> Corporation (MITEL®). The information is subject to change without notice and should not be construed in any way as a commitment by Mitel or any of its affiliates or subsidiaries. Mitel and its affiliates and subsidiaries assume no responsibility for any errors or omissions in this document. Revisions of this document or new editions of it may be issued to incorporate such changes.

No part of this document can be reproduced or transmitted in any form or by any means – electronic or mechanical – for any purpose without written permission from Mitel Networks Corporation.

#### **Trademarks**

The trademarks, service marks, logos and graphics (collectively "Trademarks") appearing on Mitel's Internet sites or in its publications are registered and unregistered trademarks of Mitel Networks Corporation (MNC) or its subsidiaries (collectively "Mitel") or others. Use of the Trademarks is prohibited without the express consent from Mitel. Please contact our legal department at legal@mitel.com for additional information.

For a list of the worldwide Mitel Networks Corporation registered trademarks, please refer to the website: http://www.mitel.com/trademarks.

# **Contents**

1	Intro	oduction	1
	1.1	Overview	1
	1.2	What is New in this Release	
2	Pers	sonal Data Collected by Mitel MiVoice 6900 Series IP Phones	
3		sonal Data Processed by Mitel MiVoice 6900 Series IP Phones	
4		sonal Data Transferred by Mitel MiVoice 6900 Series IP Phones	
5		v the Security Features Relate to Data Security Regulations	
6		a Security Regulations	
-	6.1	The European Union General Data Protection Regulation (GDPR)	
	6.1.		
7		duct Security Information	
	7.1	Mitel Product Security Vulnerabilities	
	7.2	Mitel Product Security Advisories	
	7.3	Mitel Security Documentation	
8		claimer	
_			

# **List of Tables**

Table 1: Mitel Mivoice 6900 Series IP Phones Security Features that customers may require to ach	ieve
Compliance with Data Security Regulations.	4

## 1 Introduction

#### 1.1 Overview

This document is one in a series of product-specific documents that discuss the product security controls and features available on Mitel products. This particular document will be of interest to Mitel MiVoice 6900 Series IP Phone customers that are putting security processes and security controls in place to comply with data security regulations. This document is intended to assist Mitel MiVoice 6900 Series IP Phone customers with their data security regulations compliance initiatives by:

- Identifying the types of personal data that are processed by Mitel MiVoice 6900 Series IP Phones
- Listing the Mitel MiVoice 6900 Series IP Phone Security Features that customers may require to achieve compliance with security regulations
- Providing a description of the Mitel MiVoice 6900 Series IP Phone Security Features
- Providing information on where the Mitel MiVoice 6900 Series IP Phone Security Features are documented

This document is not intended to be a comprehensive product-specific security guideline. For information on product-security guidelines, product engineering guidelines or technical papers, refer to Mitel's Web Site.

#### 1.2 What is New in this Release

MiVoice Business now supports a Class of Service (CoS) option that can be used to disable the Bluetooth interface on the 6930, 6940 and 6970 IP phones.

Document has been updated to list the personal data that may be transferred between the 6930, 6940 or 6970 IP phones and a mobile phone via MobileLink.

# 2 Personal Data Collected by Mitel MiVoice 6900 Series IP Phones

During the course of installation, provisioning, operation, and maintenance, the Mitel MiVoice 6900 Series IP Phones **collects** data related to several types of users, including:

- End-users of Mitel MiVoice 6900 Series IP Phones, data Collected may include:
  - o call history
  - o favourite dialled numbers
  - o and contact lists.
- Optionally, the user can connect Bluetooth devices such as, the Mitel Cordless Bluetooth
  Handset, the Mitel S720 Bluetooth Speakerphone, or a Bluetooth headset as an alternate audio
  device to some models of 6900 series IP phones. If this is done, it requires that the phone
  collects and stores the Bluetooth credentials.
- The 6930, 6940 and 6970 IP phones support MobileLink, a feature that allows for integration with iOS based mobile phones and Android based mobile phones. When a 6930, 6940 and 6970

- IP phone is synched with a mobile phone, the 6900 phone will collect the mobile phone's contact list and call history.
- Customers of Mitel customers for example the end-user's personal contact lists may contain personal data of business contacts.
- System administrators and technical support personnel logs may contain records of error conditions that may be viewed by system administrators and technical support personnel.
- Voice quality statistics are also collected by the 6900 series IP phone and include telephone numbers, IP address and TCP/UDP port numbers used.

## 3 Personal Data Processed by Mitel MiVoice 6900 Series IP Phones

The Mitel MiVoice 6900 Series IP Phones process the following types of data:

#### • Provisioning Data:

- o Business extension/directory number/Mobile phone contacts
- Maintenance, Administration, and Technical Support Activity Records:
  - o Mitel product support logs
  - o IP Phone Analyzer

#### • User Activity Records:

 Call history for both calling and called parties, any dialled number including favorites and contact lists

#### User Personal Content:

- Personal phone contact directory, mobile phone contact directory, and speed dial information
- o Call audio

Personal data processed by the Mitel MiVoice 6900 Series IP Phone is required for the delivery of communication services, technical support services or other customer business interests. For example, call billing and reporting services.

The Mitel MiVoice 6900 Series IP Phones do not have an end-user opt-in consent mechanism.

# 4 Personal Data Transferred by Mitel MiVoice 6900 Series IP Phones

The types of personal data transferred among the Mitel MiVoice 6900 Series IP Phones and various applications and services will depend on the specific use requirements of those applications or services, for example:

- Voice quality logs, voice quality statistics, phone inventory, username, and phone number may be configured to be read by Mitel Performance Analytics system and other customer authorized systems.
- Call history, personal phone contact directory, mobile phone contact directory and speed dial information may be transferred to the MiVoice Business system.
- In certain situations, the IP Phone may be configured to duplicate the audio stream in real time to be sent to external call recording equipment such as MiVoice Call Recording.
- Optionally a DECT headset instead of a wired handset may be utilized in which case the audio is transferred between the DECT headset and the 6900 IP Phone.
- Optionally a Bluetooth handset instead of a wired handset may be utilized in which case the audio is transferred between the Bluetooth handset and the 6900 IP Phone.
- The 6930, 6940 and 6970 IP phones support MobileLink, a feature that allows for integration with iOS and Android mobile phones. MobileLink provides the ability to:
  - Sync the mobile phone's contact list and call history with the Mitel IP phone.
  - Answer a mobile phone call using the Mitel IP phone, in which case the audio from the mobile call is transferred between the mobile phone and the 6900 IP Phone.

## 5 How the Security Features Relate to Data Security Regulations

Mitel MiVoice 6900 Series IP Phones provide security-related features which allow customers to secure user data and telecommunications data and to prevent unauthorized access to the user's data

Table 1 summaries the security features Mitel customers can use when implementing both customer policy and technical and organizational measures which the customer may require to achieve compliance with data security regulations.

Table 1: Mitel MiVoice 6900 Series IP Phones Security Features that customers may require to achieve Compliance with Data Security Regulations.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
System and Data	Access to personal data is limited with the	Details are available in the <i>MiVoice</i>
Protection, and Identity	following controls:	Business System Administration
Protection, and Identity and Authentication	Hot Desk Login on MiVoice Business The MiVoice 6900 Series IP Phones may be configured to operate as Hot Desk phones. Configuring is performed via the MiVoice Business System Administration tool.  Access to a Hot Desk phone is limited by allowing access only to a user that is authenticated with a Hot Desk Personal Identification Number (PIN). Hot Desk PIN Security ensures that all hot desk users create strong PINs by forcing them to create PINs that adhere to a set of strengthening rules.  Unauthorized users are prevented from:	In the MiVoice Business System Administration Tool, go to the following Forms:   • Multiline IP Sets Form: used by the administrator to assign directory numbers and user PINs to Hot Desk users
	<ul> <li>Receiving incoming calls at the set</li> <li>Placing outgoing calls</li> <li>Retrieving voice messages</li> <li>Programming and use feature keys</li> </ul> Phone Administrator Passcode The advanced options settings on the MiVoice 6900 Series IP Phones relate to administrator level functions and should be accessed only by the administrator. The advanced options may be protected with an administrator passcode.	

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	Phone Lock The Phone Lock feature allows the end-user to 'lock' and 'unlock' their phone with a Personal Identification Number. Phone Lock prevents unauthorized access to all the features on the phone. When a phone is locked, all programmable keys and softkeys are disabled except for the Phone Lock, Hot Desk, and Emergency Notification feature access keys.	• System Security Management Form: used by the administrator to set the Phone Administrator Passcode
		For details on Phone Lock refer to Mitel MiVoice 6940 IP Phone User Guide and the MiVoice Business System Administration Tool Help files.  In the Mitel MiVoice 6940 IP Phone User Guide, refer to Other Features.  In the MiVoice Business System Administration Tool Help files, refer to Phone Lock.
Communications Protection	Communications protection is provided with the following controls.  Voice Streaming	In the MiVoice Business System Administration Tool:
	Mitel MiVoice 6900 Series IP Phones may be configured to encrypt all IP voice call media streams with either Mitel SRTP or SRTP using AES 128 encryption.  Voice Call Signaling  Voice call signaling between the Mitel MiVoice 6900 Series IP Phones and the MiVoice	See the System Options Form and also see the information entry on Voice Streaming Security.

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	Business may be secured with Secure MiNET.  Call Privacy	See the information entry on     Call Signaling Security.
	Additional Caller privacy is controlled through the Mitel call control (PBX) settings:	
	Call Display settings	
	IP Phone Peripheral settings for Bluetooth, and the USB and the PC port.	See the Class of Service     Options Form and the Calling     Line ID Restriction Form.
	Bluetooth	
	During pairing between a 6930, 6940 or a 6070 IP phone and a mobile phone, an initialization key or master key is generated, using the E22 algorithm. The E0 stream cipher is used for encrypting packets, granting confidentiality, and is based on a shared cryptographic secret, namely a previously generated link key or master key.	• See the <i>Class of Service Options Form</i> and the <i>Blue Tooth Control Form</i> .
	The Bluetooth interface on the 6930, 6940 and 6970 IP phones can be disabled by the Administrator on a per DN basis with a CoS setting on the MiVB.	
	When the Bluetooth interface is disabled, it is not possible for the user to reenable the interface from the phone.	
Data Deletion	The 6900 IP phones have the ability to be reset to factory default. In addition, an enduser or an administrator has the ability to erase the end-user's personal data.	Details are available in the document <i>Mitel MiVoice Business</i> System Administration Tool help files.
	Corporate Contacts Folder	
	The administrator can delete all entries in the Corporate Contacts Folder.	See Telephone Directory

Security Feature	Relationship to Data Security Regulations	Where the Feature is Documented
	Personal Contacts Folder	
	The end-user can delete all entries in the	
	Personal Contacts Folder.	Dataile and available in the
	Mobile Contacts Folder	Details are available in the document <i>Mitel MiVoice 69xx</i>
	Woone Contacts Folder	Phone User Guides.
	The end-user can delete all entries in the	
	Mobile Contacts Folder.	
	Call History	See Managing Calls
	The end-user can delete all entries in the Call History application regardless of call type, all entries within a call type folder, or individual entries.	See Deleting Call History
	Speed Call Information	
	The end-user can delete all entries in the Speed Call and Private Speed Call directories.	See Speed Call.
	Other settings that are stored in the Mitel Call Control are deleted through the Call Control administration.	

## 6 Data Security Regulations

This section provides an overview of the security regulations that Mitel MiVoice 6900 Series IP Phones customers may need to be compliant with.

### 6.1 The European Union General Data Protection Regulation (GDPR)

The European Union (EU) General Data Protection Regulation (GDPR) effective on 25 May 2018 replaces the previous EU Data Protection Directive 95/46/EC.

The intent of GDPR is to harmonize data privacy laws across Europe so that the data privacy of EU citizens can be ensured. GDPR requires businesses to protect the personal data and privacy of EU citizens for transactions that occur within EU member states. GDPR also addresses the export of personal data outside of the EU. Any business that processes personal information about EU citizens within the EU must ensure that they comply with GDPR. Under GDPR, 'processes personal information' means any operation performed on personal data, such as collecting, recording, erasing, usage, transmitting, and disseminating.

#### 6.1.1 What do Businesses need to know about GDPR?

GDPR applies to businesses with a presence in any EU country, and, in certain circumstances, to businesses that process personal data of EU residents even if the businesses have no presence in any EU country.

In order to achieve GDPR compliance, businesses must understand what personal data is being processed within their organization and ensure that appropriate technical and organizational measures are used to adequately safeguard such data. Section 3 of this document explains what personal data is processed by Mitel's MiVoice 6900 Series IP Phones and highlights available security features to safeguard such data.

# 7 Product Security Information

## 7.1 Mitel Product Security Vulnerabilities

The Product Security Policy discusses how Mitel assesses security risks, resolves confirmed security vulnerabilities, and how the reporting of security vulnerabilities is performed.

Mitel's Product Security Policy is available at: <a href="https://www.mitel.com/support/security-advisories/mitel-product-security-policy">https://www.mitel.com/support/security-advisories/mitel-product-security-policy</a>

## 7.2 Mitel Product Security Advisories

Mitel Product Security Advisories are available at: <a href="https://www.mitel.com/support/security-advisories">https://www.mitel.com/support/security-advisories</a>

## 7.3 Mitel Security Documentation

Mitel security documentation includes product specific Security Guidelines, and Important Information for Customer GDPR Compliance Initiatives and Data Protection and Privacy Controls. Mitel also has Technical Papers and White papers that discuss network security and data centre security.

Mitel Product Security Documentation is available at: https://www.mitel.com/en-ca/document-center

## 8 Disclaimer

THIS SOLUTIONS ENGINEERING DOCUMENT IS PROVIDED "AS IS" AND WITHOUT WARRANTY. IN NO EVENT WILL MITEL NETWORKS CORPORATION OR ITS AFFILIATES HAVE ANY LIABILITY WHATSOEVER ARISING FROM IN CONNECTION WITH THIS DOCUMENT. You acknowledge and agree that you are solely responsible to comply with any and all laws and regulations in association with your use of Mitel MiVoice 6900 Series IP Phones and/or other Mitel products and solutions including without limitation, laws and regulations related to call recording and data privacy. The information contained in this document is not, and should not be construed as, legal advice. Should further analysis or explanation of the subject matter be required, please contact an attorney.