

FAQs General Data Protection Regulation (GDPR)

Questions and answers concerning regulation EU
2016/679 (GDPR) in correlation with ASC products

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General Data Protection Regulation (GDPR)

The Regulation (EU) 2016/679 short GDPR, took effect on May 25th, 2018. This regulation affects companies and organizations that process personal data. Consequently, the voice recording sector is affected as well. To support our partners and customers, we have created this document to answer the most important questions regarding our recording solutions.

However, we cannot give any justiciable opinion in this document as this would otherwise be legal advice which we are not authorized to give under German Legal Advice Law (RBERG). In general, and on an informative basis, it can be stated, though, that the question of the requirement for recording or, by inverse implication, the admissibility of recording as well as of possibly applicable storage and deletion periods can only be answered when taking the specific field of activity into full account. Those affected must check and answer for themselves under which conditions they must operate in compliance with the law; ASC only provides the necessary technology to do so. It would be possible to approach the respective requirements via relevant legal requirements (e. g. from the German Code of Criminal Procedure StPO for the preservation of evidence in criminal matters), regulatory directives (e. g. MiFID II), and other requirements (e. g. in occupational safety, environmental protection or competition law).

Generic questions

Data protection and security is an important pillar of ASC's product portfolio. Therefore, many measures that are now obligatory had been implemented long before GDPR took effect.

What is GDPR?

GDPR stands for General Data Protection Regulation which is short for the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC. This regulation is an EU-wide legal framework for the collection and storage of and the access to personal data with the primary objective of giving citizens and customers control over their data.

Which data is affected?

Personal data. Information serving to identify natural persons on the basis of e. g. their name, unique ID, location data, online ID, other special characteristics, and information which allow drawing conclusions about a person's genetic, economic, cultural, and social identity.

Is communications recording affected by GDPR?

Communications recording and analyzing recorded content is a way of processing data and is therefore affected by GDPR.

What is defined as "processing"?

Processing means any operation that is performed on personal data such as collecting, capturing, saving, reading out, retrieving, using, distributing or any other form of providing the respective data.

Does the Neo software utilize personal data?

Personal data may be processed throughout the system at different locations. For one thing, there are the users and employees (agent, trader, etc.). Depending on the software configuration, a certain amount of personal data concerning users is stored. The employee's name is the only mandatory field; all other information is optional. For another thing, there is the data of the customers or clients who are recorded. Part of the data set is the phone number which as a pseudonym belongs to personal data. Also depending on the system configuration and the use, further customer data may be tagged to the recording file.

What about other legal regulations?

Every organization must consider whether other legal regulations might have priority. In addition to the regulations at European level, national laws must be observed. Regulation (EU) 2016/679 has been translated into national law where country-specific deviations may occur. Therefore, it will be necessary to additionally examine which national law must be observed. For Germany this would be the new German Federal Data Protection Act (BDSG).

How to implement limited storage periods?

According to art. 47 GDPR, every organization must set up binding corporate rules regarding, for example limited storage periods. Within the System Configuration, a retention period or time to live can be set. Users with corresponding rights are allowed to define certain periods for how long conversations are kept.

Questions on the right to erasure (“to be forgotten”)

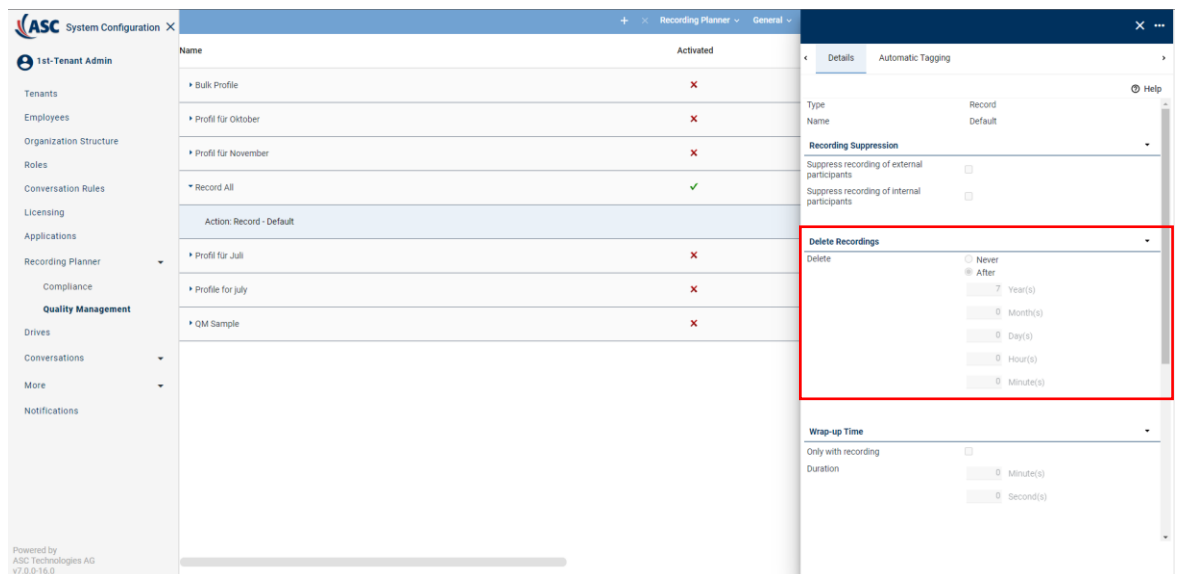
According to art. 17 GDPR, “the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay”.

How do I delete data?

Since Neo version 5.3 ASC provides the possibility of deleting conversations on tenant level. A corresponding professional service had to be inquired and executed. Now that deleting a conversation is no longer an individual exception, a license is available to enable the administrator to give certain users the right to delete conversations. Only the authorized user has a button in POWERplay Web to delete selected conversations. Further improvements will be implemented with the next versions of Neo.

General deletion process in the Neo Suite

System Configuration offers the possibility to opt for one of two different recording plans in the Recording Planner: a compliance recording plan or a recording plan for quality management purposes. Both plans allow defining different retention periods for calls with different criteria.



This setting is decisive for the automatic deletion of recordings and their corresponding meta data. A continuous deletion job is applied to the system’s database. As soon as it discovers a call with a retention period of 0 minutes, it will delete this call. If the retention period for a call in the system has

expired but no job has been applied in the meantime and thus has not found this job yet, the call may still be displayed in the system but can no longer be replayed.

Deletion process in INSPIRATIONneo

Depending on their authorization, certain users may delete calls in the Sessions module of INSPIRATIONneo. However, this deletion only affects the respective session which has been recorded in the course of the quality management recording plan. If the call has been recorded due to the settings of the compliance recording plan, then it will not be deleted.

The situation is different, though, if the deletion process is triggered by the categorization of a session and as a consequence by changing the retention period of the recording. The new retention period is decisive for sessions and for the conversations of both recording plans.

What are the steps in the deletion process?

The deletion process must be defined by the company working with the Neo Suite. Thus, the answer aims exclusively at the programmed process within the system. In general, an individually configured retention period is configured for each recorded conversation, indicating the maximum time until a conversation including its additional data will be deleted. However, if customers want to have their data deleted before this time and no other legal regulation is violated, conversations and additional data can be deleted manually as required. In these cases, the retention period is set to 0 and the data is deleted directly.

Which data is deleted?

The selected conversation and all corresponding additional data are deleted from the Neo system and cannot be retrieved again.

Is deletion logged?

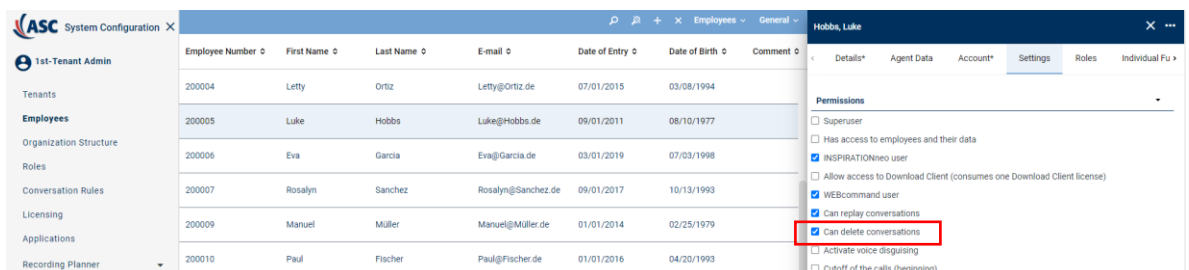
The deletion will be logged in the Audit Log protocol.

Detailed description of the deletion process

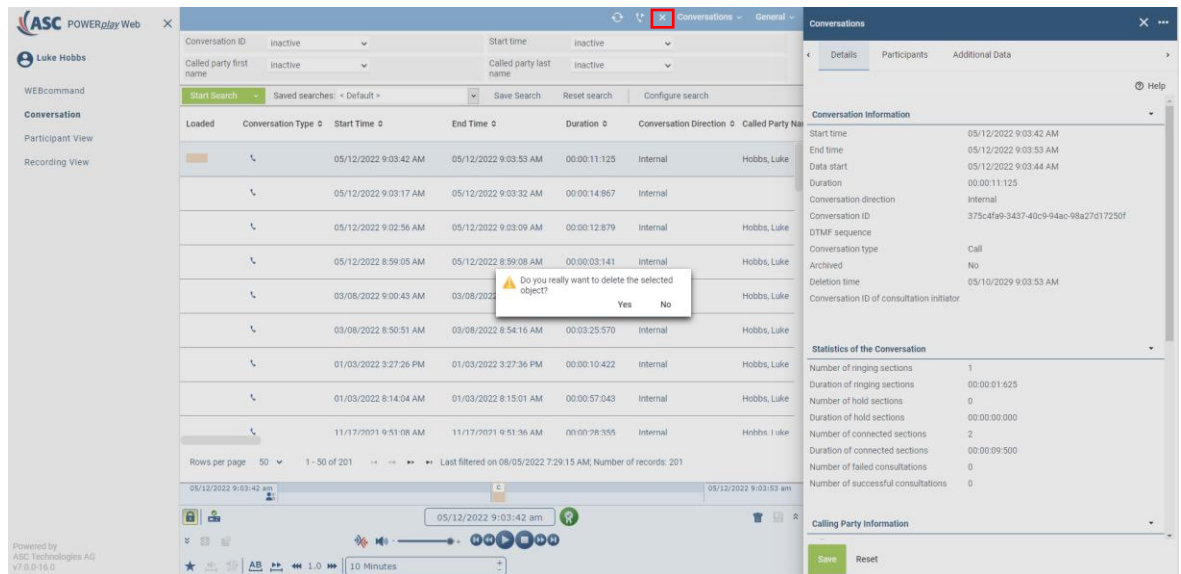
Once the license for deleting a conversation has been obtained, the corresponding right can be assigned in the System Configuration.

The right to delete a conversation must be assigned specifically to the individual authorized employees within the System Configuration.

The following figure shows where in the System Configuration, in the tab “Settings”, the respective function right can be assigned to the employee.

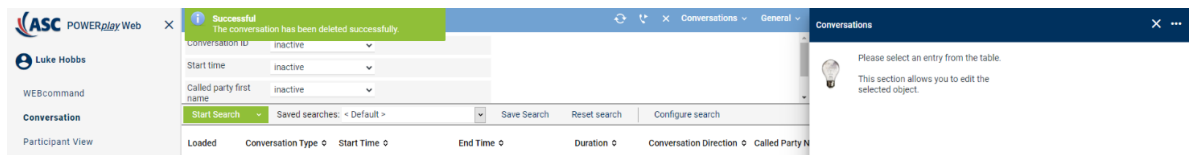


Once the right has been assigned successfully, the employee can see the additional button in the toolbar of POWERplay Web:



To delete a conversation, the conversation must be selected in the main view before clicking on the button "Delete". Upon clicking on the button "Delete", a security prompt appears which must be confirmed to irretrievably delete the conversation.

In the background the retention period ("time to live") of the conversation is set to 0 so that the conversation and all corresponding information are deleted from the system.



The deletion process is implemented in the background depending on the capacities. It may occur that the conversation continues to be displayed for a few minutes, but it cannot be replayed anymore. Once the entire deletion process has been completed, it can be tracked in the audit logs.

Questions regarding data protection and security

Neo offers various measures for data protection. Due to former data protection regulations, a large variety of security precautions can be implemented during the configuration of the system. Besides roles with various permissions, the administrator can assign password-protected user profiles. Furthermore, ASC systems are equipped with their own firewall. The firewall checks the data traffic continuously and blocks unauthorized access attempts. The firewall can be switched off upon request.

How is the access to Neo protected?

A sophisticated access authorization makes it possible to assign individual rights to all system users. This ensures that each user can only access the data and execute the function he is allowed to. System-inherent user management differentiates between access to data (e. g. to all calls from a specific agent group) and to functions (e. g. access to the function "Save as WAVE" or "Save as MP3"). This allows user profiles which perfectly fit all different customer requirements.

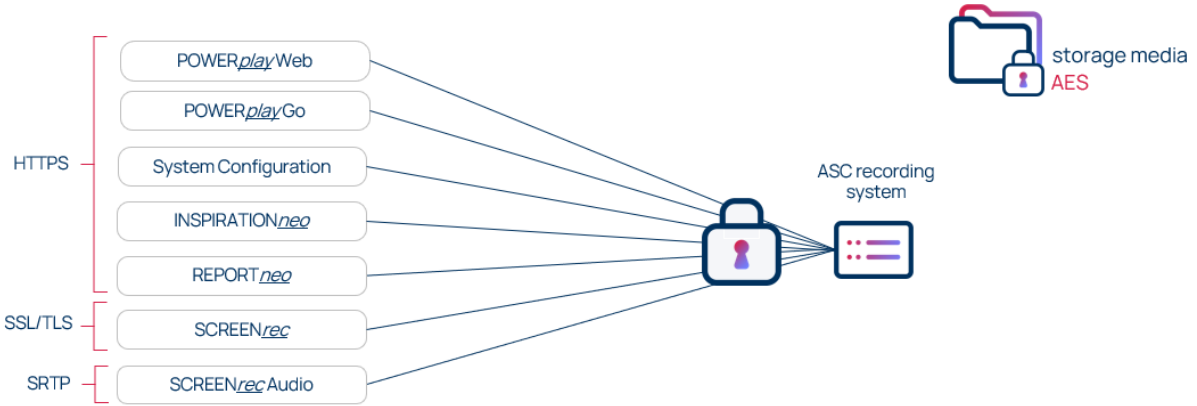
For further customer requirements, a key management system can be used to encrypt recorded conversations. Such a system offers several additional features, e. g. the usage of customer-specific keys or periodic changes of the keys used.

All user interfaces, such as the System Configuration and POWERplay Web provide an automatic log-off function. After a determined period of time during which no user interaction could be registered, the application is closed.

The best possible data protection is an important prerequisite for voice recording systems. Therefore, ASC systems have been equipped with their own firewall. The firewall checks the data traffic continuously and blocks unauthorized access attempts.

How is security of browser-based applications achieved?

In closed network environments (LAN), access protection is usually a topic of minor concern, because the IP network is protected against unauthorized external access by firewalls, intrusion detection systems, and other safety components. In public networks, though, data encryption is strongly recommended to increase the security of data. All browser-based access procedures are therefore performed in SSL-encrypted mode via the HTTPS protocol.



How is the replay of conversations secured?

All calls which are searched and replayed via the application POWERplay Web are transferred in SSL-encrypted mode. Data which is transferred to other computers to be stored there is transmitted in a proprietary ASC file format via FTP or SFTP.

Is there protection against accidental loss?

An essential point for recording enterprise communication is the high availability of hardware and software components within the recording system. ASC offers different options to guarantee system availability and protect recorded data against loss. The recording can either be used in failover operation or parallel recording can be implemented. Besides the possibility of parallel recording on two identical systems, ASC offers further options for protecting the recorded data. The internal online storage supports RAID 1 with a simple data mirroring on two hard disks where the entire data pool always exists twice. Also RAID 10 with four hard disks and thereby increased speed with additionally increased data security and enlarged storage capacity are supported.

Can data be manipulated unlawfully or by accident?

Recorded conversations cannot be modified. All call data/audio data is automatically encrypted with AES (Advanced Encryption Standard) before it is stored. Encryption with AES guarantees high data security and protects it against unauthorized access. For every saved conversation there is additional data to provide further information. Up to 30 freely definable fields are available. This data can be modified depending on individually assigned user rights.

Questions on the right of access and the right to data portability

As per art. 15 GDPR 'the data subject shall have the right to obtain ... access to the personal data', ASC enables organizations to quickly retrieve information and conversations. According to art. 20 GDPR, 'the data subject shall have the right to receive the personal data concerning him or her, ... in a structured, commonly used and machine-readable format...'., therefore the secure ASC format cannot be used.

However, ASC offers export of recorded conversations in standard formats to fulfill this requirement. Conversations can be exported as WAV, MP3, MP4 or XML, depending on the recorded content. Different methods for individual or bulk export of conversations are available. Exported files can be replayed with standard applications as well as imported into other server systems for further processing.

Questions on the right to data portability and the right to information

Export of recordings with POWERplay Web

With a license of POWERplay Web and respective user rights it is also possible to export single, several conversations or only a fragment of a selected conversation. It is also possible to export the conversations in a password secured ZIP-file. Select the conversation you would like to export in the main view and select Export under the Conversation tab. A dialog window appears to adjust several settings and conclude the export.

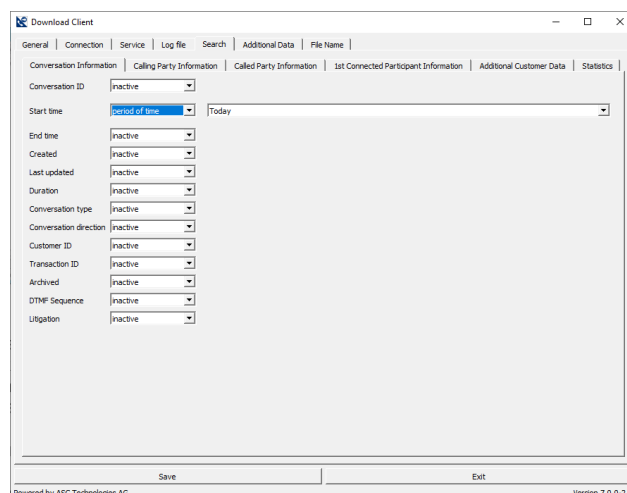
Export of recordings in System Configuration

As administrator of the tenant, you can go to the Export module of the application System Configuration and configure export jobs to export selected recordings. The audio data of the conversations is exported in WAVE or MP3 format and the additional data in XML format. The file names of the corresponding WAVE/MP3 files and XML files are identical.

Export of recordings with the Conversation Download Client

The Download Client is a new client application which can be installed on a standard computer. It offers fast and easy export of conversations, with only a few clicks. Audio conversations are exported as WAVE or MP3 files and their corresponding additional data as CSV files. Several features are available for the Download Client:

- Manual or automatic continuous download job
- Conversations can be deleted from the recording server after download
- Filter criteria for conversations to be downloaded can be set
- Filter criteria for additional data to be downloaded can be set
- For easy identification, the additional data can be indicated in the file name
- ...and more



Is there a log file that records every download?

The application System Monitoring registers all logins to the system with so-called audit messages. All user activities and interactions with the ASC systems are stored and can be retrieved in the Portal as notifications. The information that a conversation has been exported can be traced back in the Audit Log.

Implementation of GDPR-relevant features with Neo (as of August 1st, 2018)

The following features have been implemented with Neo 5.3:

POWERplay Web

- Deleting a conversation and corresponding additional data
- Security prompt to confirm deletion process
- Overview of deleted conversations by means of audit messages

The following features have been implemented with Neo 5.4:

POWERplay Web

- Deletion of multiple conversations at a time

The following features have been implemented with Neo 6.0:

POWERplay Web

- New field displaying the retention time (TTL)
- Save-as-wave dialog with several options
- Adjustments for generating a wave file for download

The following features have been implemented with Neo 6.1:

Web Service API

- The retention time (TTL) can be set for single recordings by all users with respective function rights, not only by superusers

The following features have been implemented with Neo 6.3:

POWERplay Pro

- Search of conversations by the retention time (TTL)
- Deleting a conversation and corresponding additional data
- Security prompt to confirm deletion process
- Deletion of multiple conversations at a time

The following features have been implemented with Neo 6.5:

System Configuration and Web Service API

- Export of conversations in MP3 format

The following features have been implemented with Neo 6.6:

Download Client

- Audit message for generated downloads

POWERplay Web

- Export of conversations in MP3 format
- Export of call fragments

The following features have been implemented with Neo 6.7:

System Configuration

- Import/Export of audio and video conversations from and to ASC Recording Insights
- Import/Export of audio and video conversations with attached Cloud drives such as S3, Azure and Google Cloud

Web Service API

- Enhancement to allow bulk change of the retention time (TTL) for all conversations

POWERplay Web

- Export of the search result list as CSV-file. The CSV includes all column information and available metadata

The following features have been implemented with Neo 7.0:

Neo Suite

- Recording of Cisco Webex Meetings communication
- Digital signature for recordings, utilizing a SHA256 hash key
- 2-Factor-Authentication for logins via authenticator app
- Support of TLS 1.3 for web access
- Audit message for deletion of conversations once the retention time (TTL) is reached

The following features have been implemented with Neo 7.1:

Neo Suite

- Enhancements for Tenant Specific Configuration to apply for new Tenants
- New Info and Audit Messages
- Export of Notification configuration from System Configuration
- Recording notification enhancements for agents with Recording Control
- Support of OAuth2 for SMTP
- Windows settings in Neo setup to automate maximum password
- Web Service support for SCREENrec start/stop and export of video recordings
- Enhancements for export to Recording Insights
- Support of Chat and Attachment import from Recording Insights
- Support of new Amazon S3 regions
- Enhancement to allow the configuration of a bucket for S3
- Support of Resilient File System (ReFS) for drives

INSPIRATIONneo

- New search framework
- Quality alarm notification for Supervisor

POWERplay Web

- Export of Participant list under Export Tab
- Enhancement for read-only default search
- Display of participant and PBX names within the detail tab

CLIENTcommand

- Push function to apply configuration

Download Client

- Automatic routing of downloads to folders according to customCP or content
- Enhancement of a delimiter for configurable export of CSV files
- Enhancement for download of video/screen (MP4) and chat (XML)

The following features have been implemented with Neo 7.3:

Neo Suite

- Direct access to recordings via URL link
- Media Converter
- Enhancements to apply defined minimum password requirements by default
- Enhancements for separation of the TTL between SCREEN~~rec~~ and voice recordings
- Enhancements to inherit 2FA configuration from tenants to employees
- Enhancements for configurable database backup
- Enhancements for export to Recording Insights (G.711)
- Enhancements to import notes, stop reason and RoD tags from Recording Insights
- Enhancements to set monitor points via phone import
- Enhancements for import from Azure cloud drive
- No display of the Neo Suite version on the log-in page

INSPIRATIONneo

- Enhancements of quick search for Sessions module
- Rights management of Recording Planner Profiles for Sessions module

POWERplay Web

- Conversation Safe

Download Client

- Enhancement to allow batch change of TTL

REPORTneo

- New Template-based and Custom Reports

The following features have been implemented with Neo 8.0:

Neo Suite

- Technical refresh and enhanced security
- Logging of TTL deletions within a log-file
- Recording volume validation
- DTMF support for MiVoice MX-ONE recording (CSTA)
- Support of Mitel CX SIP add-on
- Enhancement to support the import of Dubber recordings
- Enhancement to support the import of Redbox archives
- Enhancement to support containers for Azure drives
- Enhancement to support Proxy Authentication for cloud storages



INSPIRATION_{neo}

- Enhancements of the Session module to export search results as CSV
- Enhancement to automatically forward evaluation results to specific email addresses

POWER_{play} Web

- Enhancement for display of conversation origin
- Conversation Safe: display of the user who added the conversation

The following features are expected to be released with a later Neo version:

POWER_{play} Web

- Implementation of a rights concept for users. It will be possible to mark conversations for deletion; the actual deletion can be done by the compliance officer after

Document History

Date	Version	Autor(s)	Status	Amendments
11.04.25	05	J. Fountain	Released	New design layout, add of Neo 7.1, 7.3
07.04.26	06	J. Fountain	Released	Adjustments of design and for Neo 8.0, removal of POWER _{play} Pro