SUTH: CHECKLIST FOR COMPLIANCE WITH THE RIGHTS OF DATA SUBJECTS TO INFORMATION, DATA PORTABILITY, ERASURE AND CORRECTION UNDER THE GDPR

NOTE	This checklist is intended to be an aid for the operators of a Swyx communication solution in connection with the General Data Protec- tion Regulation (GDPR) to enable data controllers to satisfy the rights of data subjects as they are asserted. This checklist does not claim to be complete in terms of scope or content.
APPLICABILITY	This checklist applies to all SwyxWare and Swyx Client versions available as of May 2018 (SwyxIt!, Swyx Desktop for macOS, Swyx Mobile for iOS/Android). Other default settings and other limitations on functionality may apply to legacy versions. Please note the following in relation to updates: Changes to software behavior do not apply retroactively, but from the time of installation!
RIGHTS OF DATA SUBJECTS UNDER THE GDPR	 Under the General Data Protection Regulation (GDPR), data subjects have the following rights in dealings with data controllers regarding the following personal data relating to the data subject: Right of access, Right to rectification or erasure, Right to restrict processing, Right to object to processing, Right of data portability. They also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of their personal data.
USAGE INFORMATION	Where a data subject exercises their right to information, the necessary information is provided under the "Data" columns. Where a data subject exercises their right to rectification or erasure, please follow the instructions under the column "Rectification" or "Erasure". The rights to object to and restrict processing must be satisfied by means of manual processes. If the data subject wishes to exercise their right to data portability, please follow the instructions under the column "Export".

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SWYXWARE

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA SwyxWare change log • Name of the user that made the change PURPOSE Documentation of changes and assistance with troubleshooting STORAGE LOCATION SwyxWare Database	In SwyxWare Administration Context menu for the correspond- ing time period "Export List" Set save location; the file can be saved as a tab-separated or comma- separated file.	In SwyxWare Administration SwyxWare Administration Mark the desired time period and select "Delete" in the context menu.	Not permitted! Violates the integrity and confidentiality of the data.
	DATA User/administrator accounts and user account details • real name of the user • user name • numbers of the user • user email address(es) • user passwords PURPOSE Use of software STORAGE LOCATION SwyxWare Database	Note: For reasons of data protec- tion, it is not possible to export sensitive data or data entered by the user!	SwyxWare Administration Select SwyxServer Select "User" folder Right-click on corresponding user or administrator name: "Delete"	SwyxWare Administration Select SwyxServer Select "User" folder Double-click on corresponding user or administrator name Click on "Administration" Click "Authentification" tab

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Run protocols for SwyxWare services: SwyxServer SwyxConfigDataStore SwyxPhoneManager SwyxQueueManager SwyxQueueManager SwyxQueueManager SwyxGate SwyxGate SwyxGate SwyxRemoteConnector SwyxConferenceManager SwyxConferenceManager SwyxCTI+ SwyxFax Server SwyxFax Server SwyxFax Server SwyxFax Printer Gateway SwyxReporting Swyx help program Swyx help program Swyx Push Notification Service PURPOSE Assistance with troubleshooting STORAGE LOCATION On Windows Server: C:\ProgramData\Swyx\Traces C:\ProgramData\T-Com\Traces C:\ProgramData\T-Com\Traces C:\ProgramData\T-Com\MemoryDumps	Open corresponding folder in Windows Explorer, open .log files and copy desired content into file.	Data is deleted automatically after seven days by default. TraceTool can be used to manually delete data (e.g. older data that was already present before automatic deletion was enabled).	Not permitted! Violates the integrity and confidentiality of the data.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Personal Phonebook • Name of the conversation partner • Number of the conversation partner PURPOSE Use of software STORAGE LOCATION SwyxWare Database	SwyxWare Administration Select SwyxServer Select "User" folder Open context menu of desired user Click on "Phone book Export" Execute Export Wizard Save as *.CSV file	SwyxWare Administration Open SwyxServer Right-click on desired user Click on "Phone book Open" Click on "Personal Phone book" Right-click on desired entry Click on "Delete Entry" Confirm query with "Yes"	Done by the users themselves in the configura- tion menu of their phone book in Swyxlt! Client.
	 DATA Faxes & configuration files User name and numbers (internal, fax) Address (business) User email address User department Forwarded faxes PURPOSE Use of software Overview of forwarded faxes of SwyxWare users for the administrator STORAGE LOCATION Configuration data: SwyxWare Database Fax documents: SwyxWare Database or local server HDD 	 Note: For reasons of data protection, it is not possible for the administrator to export sender data or faxes! SwyxWare Administration Export function for users - Swyx-Fax Client Fax folder Click on corresponding entry Right-click "Export" SwyxWare Administration Exporting forwarded faxes Select SwyxServer Select "SwyxFax" folder Right-click "Forwarding Overview" Select "Export List" Save as "*.txt" file 	 SwyxWare Administration - Deleting sender information Select SwyxServer Select "User" folder Double-click on corre- sponding user name "Settings" tab Fax Client "Sender" tab Delete corresponding fields SwyxWare Administration - Deleting faxes: Select SwyxServer Select "SwyxFax" folder Active faxes and stored faxes for the user on the selected SwyxServer Right- click "Delete" Export function for users - SwyxFax Client: Fax folder Click on corresponding entry Right-click "Delete" 	Note: It is not possible to correct faxes! • Correction of sender data - SwyxWare Administration: Select SwyxServer Select "User" folder Double-click on corresponding user name Fax Client "Sender" tab Delete cor- responding fields

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	 DATA Call Detail Records (CDR) Originating caller name and number Destination caller name and number (may be anonymized where appropriate) Name and number of the person who actually accepted the call (may be anonymized depending on user-defined selection) PURPOSE Billing purposes Assistance with troubleshooting STORAGE LOCATION Either SwyxWare CDR Database or Directory defined by user as text file 	Note: If you select the database as the storage location, it is your responsibility to observe applica- ble statutory regulations, as we are not in a position to influence database hosting. SwyxWare Administration Select SwyxServer Open properties "Call Detail Records" tab Activate "Call Detail Records into Text File" checkbox	Note: If you select the database as the storage location, it is your responsibility to observe applicable statutory regulations, as we are not in a position to influence database hosting. Note: in the case of size-based storage, the corresponding deletion periods are not taken into account. A manual deletion is necessary! Note: When activating automatic deletion mechanisms, all data prior to the time of activation will need to be deleted manually! • From the user defined folder: Automatically after 7 days or after user-defined time, define time under SwyxServer properties "Call Detail Records" tab	Not permitted! Violates the integrity and confidentiality of the data.
	DATA SwyxFax Server fax forwarding Internal number Public number real name of the user User email address PURPOSE Overview of forwarded faxes of SwyxWare users STORAGE LOCATION SwyxWare Database	Note: For reasons of data protec- tion, it is not possible to export sender data or faxes! • SwyxWare Administration Exporting forwarded faxes Select SwyxServer Select "SwyxFax" folder Right-click "Forwarding Overview" Select "Export List" Save as "*.txt" file	SwyxWare Administration Open SwyxServer Click on "SwyxFax Forwarding Overview" Right-click on desired entry Click on "Proper- ties" Mark desired entry in "Internal Number" section Click on "Delete" Mark desired entry under "Number mappings" Click on "Remove" Click on "OK"	Done by the users themselves in the fax forwarding configu- ration menu in the SwyxFax Client.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	 DATA User credentials for the Microsoft Teams account used for synchronization E-mail addresses of Microsoft Teams users (non-persistent) PURPOSE Display user presence information from Microsoft Teams STORAGE LOCATION Encrypted entry in the SwyxWare database 	Note: For data protection reasons the export is not possible!	User credentials: Corresponding 'Delete' function in SwyxWare Administration Email addresses: Restart of the server, since only in volatile memory	User credentials: Via the cor- responding SwyxWare Administration function Email addresses: Can only be corrected on the part of Mic- rosoft teams

SWYXON

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA SwyxON Web Portal change log • Name of the user that made the change PURPOSE Documentation of changes and assistance with troubleshooting STORAGE LOCATION SwyxON database	Individual UC tenants and RMS SwyxON Web Portal "UC Tenant" menu Change log UC tenant or "RMS" Click on "Export"	An automatic deletion takes place after a preset time. Deletion deadlines can be adjusted in SwyxON Portal. Default: 90 days	Not permitted! Violates the integrity and confidentiality of the data.
	DATA Run protocols for SwyxWare services: • SwyxServer • SwyxConfigDataStore • SwyxPhoneManager • SwyxQueueManager • SwyxQueueManager • SwyxQueueManager • SwyxGate • SwyxGate • SwyxGate • SwyxGate • SwyxGate • SwyxConferenceManager • SwyxConferenceManager • SwyxConferenceManager • SwyxConferenceManager • SwyxCTI+ • SwyxCTI+ • SwyxFax Server • SwyxFax Server • SwyxFax Printer Gateway • SwyxReporting • SwyxReporting • SwyxReporting • Swyx help program • Swyx Push Notification Service PURPOSE Assistance with troubleshooting STORAGE LOCATION SwyxON Server	Launch Remote Admin Connector Connect to corresponding UC tenant Select "Download Trace Files" in widget.	Data is deleted automatically after seven days by default.	Not permitted! Violates the integrity and confidentiality of the data.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA User/administrator accounts and user account details • real name of the user • user name • numbers of the user • user email address(es) • user passwords PURPOSE Use of software STORAGE LOCATION SwyxWare Database	For reasons of data protection, it is not possible to export sensitive data or data entered by the user.	SwyxON Portal administrators Web Portal "Platform" or "Partner" menu Select relevant partner as appropriate Select "Administrators" in menu Select corresponding user "Delete"	SwyxON Portal administra- tors Web Portal "Platform" or "Partner" menu Select relevant partner as appropri- ate Select "Administrators" in menu Select correspond- ing user "Edit"
	DATA SwyxON Portal reporting emails PURPOSE Billing for usage STORAGE LOCATION SwyxON database	SwyxON Portal "Partner Report- ing" menu Click on "Create New Report" (report will be sent as email attachment to service provider)	 An automatic deletion takes place after a preset time. Deletion dead- lines can be adjusted in SwyxON Portal. Default: 90 days In the service provider's email inbox: Please ensure deletion 	Not permitted! Violates the integrity and confidentiality of the data.
	DATA Personal Phonebook • Name of the conversation partner • Number of the conversation partner PURPOSE Use of software STORAGE LOCATION SwyxON database	SwyxON Administration Select SwyxServer Select "User" folder Open context menu of desired user Click on "Phone book Export" Execute Export Wizard Save as *.CSV file.	SwyxON Administration Open SwyxServer Right-click on desired user Click on "Phone book Open" Click on "Personal Phone book" Right-click on desired entry Click on "Delete Entry" Confirm query with "Yes"	Done by the users themselves in the configura- tion menu of their phone book in Swyxlt! Client.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	 DATA Faxes & configuration files User name and numbers (internal, fax) Address (business) User email address Forwarded faxes PURPOSE Use of software Overview of forwarded faxes of SwyxON users for the administrator STORAGE LOCATION SwyxON database	 Note: For reasons of data protection, it is not possible to export sender data or faxes! Export function for the user - SwyxFax Client: Fax folder Click on corresponding entry Right-click "Export" SwyxON Administration Exporting forwarded faxes Select SwyxServer Select "SwyxFax" folder Right-click "Forwarding Overview" Select "Export List" Save as "*.txt" file 	 SwyxON Administration Deleting sender information Select SwyxServer Select "User" folder Double-click on corre- sponding user name "Settings" tab Fax Client "Sender" tab Delete corresponding fields SwyxON Administration - Deleting faxes Select SwyxServer Select "Swyx- Fax" folder Active faxes and stored faxes for the user on the selected SwyxServer Right-click "Delete" Export function for the user -SwyxFax Client Fax folder Click on corresponding entry Right-click "Delete" 	Note: It is not possible to correct faxes! • Correction of sender data - SwyxON Administration Select SwyxServer Select "User" folder Double-click on corresponding user name Fax Client "Sender" tab Delete cor- responding fields
	DATA SwyxFax Server fax forwarding Internal number Public number real name of the user User email address PURPOSE Overview of forwarded faxes of SwyxON users STORAGE LOCATION SwyxON database	Note: For reasons of data protec- tion, it is not possible to export sender data or faxes! • SwyxON Administration Exporting forwarded faxes Select SwyxServer Select "SwyxFax" folder Right-click "Forwarding Overview" Select "Export List" Save as "*.txt" file	SwyxON Administration Open SwyxServer Click on "SwyxFax Forwarding Overview" Right-click on desired entry Click on "Proper- ties" Mark desired entry in "Internal Number" section Click on "Delete" Mark desired entry under "Number mappings" Click on "Remove" Click on "OK"	Done by the users themselves in the fax forwarding configuration menu in the SwyxFax Client.

SWYX CLIENTS

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyx clients (Swyxlt!, Swyx Desktop for macOS, Swyx Mobile for iOS/Android) call journal and events • Contact telephone number • Contact name • Calls recorded via Swyxlt! PURPOSE Use of software STORAGE LOCATION • SwyxWare Database • on the relevant device	 Call journal: For SwyxWare administrators: Copy call journal & entries manually from the database using export command For SwyxON administrators: Please contact the Support For calls recorded using SwyxIt!: On the user's local system: Export from SwyxIt!: SwyxIt! Open SwyxIt! Click on "Call Journal" Select tab "Recorded Conversa- tions": Click on "Next Export" Follow the export wizard. The recordings will be saved as WAV files. 	 Call journal: Swyxlt! On the user's local system: Swyxlt! Open Click on "Call Journal" Right-click desired entry Click on "Delete Entry" or click on "Delete List" to clear the entire call journal. macOS: Context menu - Delete all displayed events iOS: Edit - "Delete all" Android: Long-Press Select all "Delete" icon For calls recorded using Swyxlt!: On the user's local system: Delete the relevant WAV file Note: Data will not be deleted automatically by uninstalling, please delete manually. 	Not permitted! Violates the integrity and confidentiality of the data.
	DATA User image in Swyx clients (Swyxlt!, Swyx Desktop for macOS, Swyx Mobile for iOS/Android) PURPOSE Software personalization STORAGE LOCATION • SwyxWare Database • Directory defined by user	 For SwyxWare administrators: Export from SwyxWare Database For SwyxON administrators: Please contact the Support 	 For SwyxWare administrators: Delete from SwyxWare Database For SwyxON administrators: Please contact the Support 	Done by the users themselves in the configura- tion menu of the respective Swyx client.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Favorites in Swyx clients (Swyx Desktop for macOS, Swyx Mobile for iOS/Android) • real name of the user • Various Number of User • Various User email address PURPOSE Storage of frequently used numbers STORAGE LOCATION • SwyxWare Database • Locally on the smartphone	The favorites synchronized by SwyxServer for the Swyx contacts can be exported from the SwyxWare Database. Local contact details remain on the device.	 For SwyxWare administrators: With a corresponding SQL DELETE com- mand in the SwyxWare Database For SwyxON administrators: Please contact the Support For the user of the relevant Swyx cli- ent: In the menu of the relevant cli- ent Note: Data will not be deleted automatically by uninstalling, please delete manually. 	Only by the user of the relevant Swyx client.
	DATA SwyxFax Client address book (personal address book) User company real name of the user user fax numbers user E-mail address (business: internal, possibly public, possibly mobile, possibly private: landline, mobile) User department user address PURPOSE Use of software STORAGE LOCATION Default setting: "C:\Users\[User]\AppData\Roaming\Swyx\SwyxFax Client\private.dta"; storage location can be customized under the menu "Extras Options General". 	On the user's local system "C:\Users\[User]\AppData\Roamin g\Swyx\SwyxFax Client\private.dta"; storage location can be customized under the menu "Extras Options General".	On the user's local system Open SwyxFax Client Click on "Quick Fax" icon "General" tab Click on "Address Book" in the "Send Fax" window Select entry Click on "Delete" Click on "OK"	On the user's local system Open SwyxFax Client Click on "Quick Fax" icon "General" tab Click on "Address Book" in the "Send Fax" window Select entry Make changes Click on "Change" Click on "OK"

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyx Outlook add-in Phone Dialer cache PURPOSE Faster access to contact details STORAGE LOCATION On the client PC: • Outlook • User's temporary directory	Enter "%Temp%" in Windows Explorer address bar Confirm with Enter Select "Swyx" folder Open corresponding .log files and copy desired content into file	Enter "%Temp%" in Windows Explorer address bar Select "Swyx" folder Delete corresponding .log files Deletion only recommended if appli- cation is no longer being used. Note: Data will not be deleted automatically by uninstalling, please delete manually	Correction is performed automatically when corre- sponding contact details are amended in Outlook.
	DATA User-specific telephone data (call journal) in SwyxPhones PURPOSE Use of SwyxPhones STORAGE LOCATION Internal device storage and SwyxWare Database	Export from SwyxWare Database, as the data is synchronized there.	Reset telephone to factory settings.	Can only be done by the user.
	DATA User-specific telephone data (conversation list) in SwyxPhones PURPOSE Use of SwyxPhones STORAGE LOCATION Internal device storage	Export not possible for technical reasons.	Select "Conversations" in the default view of the SwyxPhone and press "OK". Then press the ">" key. Select the entry "Delete all conversations" using the navigation wheel. Press "OK". Select the entry "Delete" using the navigation wheel. Confirm your selection by pressing "OK".	Can only be done by the user.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA User-specific telephone data (conversation list) in DECT devices PURPOSE Usage of DECT devices STORAGE LOCATION Internal device storage	Export not possible for technical reasons.	In the menu of the DECT device	In the menu of the DECT device
	DATA Swyxlt! Speed dial buttons • Contact name • Contact number PURPOSE Use of software STORAGE LOCATION SwyxWare Database	In Swyxlt! "File" in Swyxlt! Menu Name/shortcut keys Export	Swyxlt!: Import empty *.key file or delete individual entries manually	Overwrite data manually in Swyxlt! or add other contacts, contact informa- tion is managed centrally in the phonebook.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyxlt! Swyxlt! user data User • Trace files • Files in user directory of the operating system PURPOSE Simplified operation STORAGE LOCATION User's temporary directory: %temp%\Swyx\Traces\Swyxlt!.log or %temp%\T-Com\Traces\NetPhone Client.log Files in user directory of the operating system C:\Users\[User]\AppData\Local\Swyx or	Copy from the temporary files of the operating system	As long as Swyxlt! is installed, an automatic deletion process is given by the application and the operating system. If Swyxlt! is uninstalled a manual deletion of the files is neces- sary!	A correction should gener- ally only be made via the user interface. Manual correction of the files is not recommended.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyxlt! Traces (disabled by default), consisting of: • Swyxlt! Traces • CDSClient CLMgr Traces • CDSClient Swyxlt! Traces PURPOSE Assistance with troubleshooting STORAGE LOCATION User's temporary directory: %temp%\Swyx\Traces\Swyxlt!.log or %temp%\T-Com\Traces\NetPhone Client.log, %temp%\Swyx\Traces\CDSClient.CLMgr.log or %temp%\Swyx\Traces\CDSClient.Swyxlt!.log, %temp%\T-Com\Traces\CDSClient-CLMgr.log or %temp%\T-Com\Traces\CDSClient.NetPhone Client.log	Copy from the text files	Text files can be deleted manually at any time. Note: Data will not be deleted automatically by uninstalling! Please remove manually.	Not permitted! Violates the integrity and confidentiality of the data.
	DATA Swyx Connector for Skype for Business Traces PURPOSE Traceability of errors STORAGE LOCATION User's temporary directory: C:\ProgrammData\Swyx\Traces\LyncPlugin or C:\ProgrammData\T-Com\Traces\LyncPlugin	Copy from the text files	Text files can be deleted manually at any time. Note: Data will not be deleted automatically by uninstalling! Please remove manually.	Not permitted! Violates the integrity and confidentiality of the data.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	 DATA Swyx Desktop for macOS - local user data, consisting of: Offline database (contact and traffic data) traces, if applicable User settings & key chain (passwords and account information) PURPOSE Offline use of the client simple traceability in the event of an error easy usability of the client STORAGE LOCATION Hidden user directory of the operating system 	Relevant content is synchronized with the server and can be exported from there. Traces can be exported via the "Share" function of the client.	Hidden user directory can be deleted manually. Attention: Deletion is only recom- mended during deinstallation due to considerable usage restrictions!	Except for protocols, the correction is possible via the user interface.
	DATA Personal phone book of the user • telephone book maintained manually by the user with any contacts PURPOSE Simplification of use STORAGE LOCATION Server database	Swyxlt! Export Assistant (function accessible via the personal phone- book)	Deletion via the server database possible	Correction by the user directly possible.
	DATA Swyx Mobile error reports (Swyx Mobile for iOS/ Android), can optionally be activated in the mobile clients PURPOSE Simple traceability in the event of an error STORAGE LOCATION Hidden application folder	Error reports can be exported via the "Share" function of the client.	Recording generally only takes place for 7 days. Data is deleted automati- cally by deactivating the function.	Not permitted! Violates the integrity and confidentiality of the data.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyx Meeting Premium credentials PURPOSE Use of Swyx Meeting STORAGE LOCATION In the Windows Credential Manager	For reasons of data protection, it is not possible to export sensitive data or data entered by the user.	The Swyx Meeting credentials are not deleted by uninstalling. The credentials remain encrypted.	Rectification is not possible.
	DATA Swyx Meeting Basic version credentials PURPOSE Use of Swyx Meeting STORAGE LOCATION Swyx Meeting Server	For reasons of data protection, it is not possible to export sensitive data or data entered by the user.	The Swyx Meeting credentials are not deleted by uninstalling. The credentials remain encrypted. For administrators: Please contact the Support.	Rectification possible by changing the Swyx user data in SwyxServer.
	DATA Swyx Meeting user data See also the Swyx Meeting Privacy Policy: https:// www.swyx.com/data-privacy.html PURPOSE Use of Swyx Meeting STORAGE LOCATION Swyx Meeting Server (only for the duration of the meeting)	Export is not possible as the data is only persistent for the duration of the meeting.	The data is deleted automatically by terminating the meeting.	Rectification is not possible as the data is only persistent for the duration of the meeting.
	DATA Swyxlt! user data User PURPOSE Use of Swyxlt! STORAGE LOCATION Computer\HKEY_CUR- RENT_USER\Software\Swyx\CommonLogin\Current- Version\Options\	Export is not possible.	The relevant folder is deleted when uninstalling Swyxlt!. The credentials remain encrypted.	Rectification is not possible.

DONE	DATA	EXPORT	ERASURE	RECTIFICATION
	DATA Swyx Messenger ("Chat") usage data (Swyxlt!, Swyx Desktop for macOS, Swyx Mobile for iOS/Android): IP address Login data Chat messages Chat partner Read status of chat messages Files and pictures sent PURPOSE Use of the messaging service StORAGE LOCATION Swyx Messenger Server Files in local user directory Swyxlt!: C:\Users\[User]\%appdata%\Swyx\SwyxMessen- ger\chatSettings.json macOS: Hidden user directory of the operating system iOS/Android: Hidden application folder	Export is not possible.	On the server: Please contact the Support Local user data: Please delete Swyxlt! and Swyx Desktop data manually after uninstalling iOS/Android: Data is deleted when uninstalling the app	Login data can be corrected by the administrator.