

Mitel 6800/6900 Series SIP Phones – Important Product Information for Customer GDPR Compliance Initiatives

Mitel 6800/6900 Series SIP Phones- SIP Firmware Release 5.0

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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 6800/6900 Series SIP Phone customers that are putting security processes and security controls in place to comply with GDPR.

This document is intended to assist Mitel MiVoice 6800/6900 Series SIP Phone customers with their GDPR compliance initiatives by:

- Identifying the types of personal data that are processed by the Mitel 6800/6900 Series SIP Phones
- Listing the Mitel MiVoice 6800/6900 Series SIP Phone Security Features that customers may require to achieve GDPR compliance
- Providing a description of the Mitel MiVoice 6800/6900 Series SIP Phone Security Features
- Providing information on where the Mitel MiVoice 6800/6900 Series SIP 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 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, 'processing personal data' means any operation performed on personal data, such as collecting, recording, erasing, usage, transmitting, and disseminating.

1.2.1 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. This document explains what personal data is collected, processed and transferred by the Mitel MiVoice 6800/6900 Series IP Phones and highlights available security features to safeguard such data.

2 Personal Data Collected by Mitel MiVoice 6900 Series SIP Phones

During the course of installation, provisioning, operation and maintenance, the Mitel 6800/6900 Series SIP Phones collect data related to several types of users, including:

- End users of Mitel MiVoice 6800/6900 Series SIP Phones – data collected may include:
 - Call history
 - Favourite dialled numbers, speed dial numbers
 - Contact lists
 - 802.1X credentials, which may or may not be related to personal credentials
 - Username/password combination for set registration, which may or may not be related to personal credentials
- Optionally the user can connect Bluetooth devices to some models of 6900 series SIP Phones. When this is done, it is required that the phone collects and stores the Bluetooth credentials. Personal contact lists may be shared at this point between a mobile device and the Mitel SIP set.
- 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 6800/6900 series SIP Phones and include telephone numbers, IP address, and TCP/UDP port numbers used.

3 Personal Data Processed by Mitel MiVoice 6900 Series SIP Phones

The Mitel 6800/6900 Series SIP Phones process the following types of data:

- **Provisioning Data:**
 - Business extension/directory number/mobile phone contacts, and username/password
- **Maintenance, Administration, and Technical Support Activity Records:**
 - Mitel product support logs
- **End User Activity Records:**
 - Call history for both calling and called parties, any dialled number including favorites and contact lists

- **End User Personal Content:**
 - Personal phone contact directory, corporate directory, mobile phone contact directory, and speed dial information.
 - Call audio
 - Bluetooth integration may include personal contacts from the attached device

The Mitel MiVoice 6800/6900 Series SIP Phones process only personal data that is required for the delivery of communication services, technical support services, or other customer business interests; for example, call quality and reporting services.

- There are no end user opt-in consent mechanisms implemented in Mitel 6800/6900 Series SIP Phones.

4 Personal Data Transferred by Mitel MiVoice 6900 Series SIP Phones

The types of personal data transferred among the Mitel 6800/6900 Series SIP Phones and various applications and services depend on the specific use requirements of those applications or services. For example:

- Voice quality logs, voice quality statistics, phone inventory, user name, and phone number may be configured to be read by the 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 customer's PBX or Call Server
- In certain situations, the SIP Phone may be configured to duplicate the audio stream in real time to be sent to customer authorized external call recording equipment
- Optionally a Bluetooth handset or headset instead of a wired handset may be utilized, in which case, the audio is transferred between the Bluetooth handset and the 6800/6900 IP Phone
- IEEE 802.1X credentials may be collected, which may or may not be related to personal credentials

5 How Mitel MiVoice 6900 Series SIP Phone Security Features Relate to GDPR

Mitel 6800/6900 Series SIP Phones provide security-related features that allow customers to secure user data and telecommunications data and prevent unauthorized access to the user's data

Table 1 summarizes the security features Mitel customers can use when implementing both customer policy and technical and organizations measures which the customer may require to achieve GDPR compliance.

Table 1: Mitel MiVoice 6900 Series SIP Phone Security Features that Customers May Require to Achieve GDPR Compliance

Security Feature	Feature Details	Where the Feature is Documented
Identity and Authentication, and Access and Authorization	<p>Access to personal data is limited with the following controls:</p> <p>Hot Desk Log in The MiVoice 6900 Series SIP Phones may be configured to operate as Hot Desk phones. Configuring is performed using the Configuration file.</p> <p>Access to a Hot Desk phone is limited by only allowing access to a user that is authenticated with a Hot Desk Personal Identification Number (PIN). Hot Desk PIN Security ensures that all hot desk users are mandated to create strong PINs that adhere to a set of strengthening rules.</p> <p>Unauthorized users are prevented from:</p> <ul style="list-style-type: none"> • Receiving incoming calls at the set • Placing outgoing calls • Retrieving voice messages • Programming and using the feature keys <p>Phone Administrator Passcode The advanced options settings on the MiVoice 6900 Series SIP Phones relate to administrator level functions and can be accessed only by the administrator. The advanced options are protected with an administrator's passcode.</p> <p>For an administrator, the default username is 'admin', and the passcode is a numeric passcode. For an end user, the default username is 'user'; the passcode is a numeric passcode.</p> <p>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 the feature</p>	<p>Details are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the section <i>Configuring Advanced Operational Features</i>. Also see <i>Visitor Desk Phone Support</i>.</p> <p>Details related to the Administrator Password are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Administrator Options</i>.</p> <p>Details related to Phone Lock are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p>

	<p>access keys for Phone Lock, Hot Desk, and Emergency Notification.</p> <p>Network Access Sets can support secured network access through IEEE 802.1X. This feature supports both the EAP-MD5 and EAP-TLS Protocols.</p> <p>Web Access The Mitel Web UI has HTTPS enabled by default on IP phones. When you open a browser window and enter an IP address or host name for a phone using HTTP, a server redirection occurs, which automatically converts an HTTP connection to an HTTPS connection.</p> <p>The configuration file allows specification of SIP Root and Intermediate Certificate files, local certificate files, private key filename, and/or trusted certificate file name when the phone uses the TLS transport protocol to set up a call.</p> <p>The System Administrator can disable the Mitel Web UI on a single phone or on all phones, if required, using the configuration files.</p>	
<p>Communications Protection</p>	<p>Communications protection is provided with the following controls:</p> <p>Voice Streaming Mitel 6800/6900 Series SIP Phones may be configured to encrypt all IP voice call media streams with Secure Real Time Protocol (SRTP) using AES 128 encryption.</p> <p>Voice Call Signaling Voice call signaling between the Mitel 6800/6900 Series SIP Phones and the MiVoice Business may be secured with SIP with Transport Layer Security (TKS).</p> <p>Call Privacy Caller privacy is controlled through the set's configuration file or through web server settings,</p>	<p>Details related to encryption for voice streaming and call signaling are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide and in the product documentation for the PBX to which the phone connects.</p> <p>Call Privacy support depends on the PBX. For details, see the appropriate PBX product documentation.</p>

	<p>Call Display settings, IP Phone Peripheral settings for Bluetooth, and USB and the PC port settings.</p> <p>Other Setups A customer can further limit access over the network using standard network security techniques such as VLANs, access control lists (ACLs), and firewalls.</p> <p>In all cases, physical access to systems must be restricted by the customer.</p>	
<p>Data Deletion</p>	<p>The 6900 SIP Phones can be reset to factory default when required. In addition, an end user or an administrator has the ability to erase the end user's personal data.</p> <p>Corporate Contacts Folder The administrator can delete all entries in the Corporate Contacts folder.</p> <p>Personal Contacts Folder The end user can delete all entries in the Personal Contacts folder.</p> <p>Call History 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.</p> <p>Mobile Contacts Folder The end user can delete all entries in the Mobile Contacts folder.</p> <p>Speed Call Information The end user can delete all entries in the Speed Call directory.</p>	<p>Details related to all of the supported Corporate Contact Folders are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to the Personal Contacts Folder are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to the Call History are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to the Mobile Contacts Folder are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p> <p>Details related to deleting Speed Dial entries are available in the Mitel 6800/6900 Series SIP Phones Administrator Guide in the chapter <i>Operational Features</i>.</p>

6 Product Security Information

6.1 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:

www.mitel.com/support/security-advisories/mitel-product-security-policy

6.2 Mitel Product Security Publications

Mitel Product Security Publications are available at:

www.mitel.com/support/security-advisories

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