

Privacy and Data Protection at RingCentral

April 2022



RingCentral and the Global Data Privacy Landscape

RingCentral takes the responsibility to protect our customers' data privacy and security seriously. In keeping with this responsibility, we commit to comply with applicable local and regional laws and regulations. As a leading global communications and collaboration cloud service provider, RingCentral's services are designed to help our customers meet their compliance obligations.

In this whitepaper, we provide information to help customers understand our data protection practices and how they fit with RingCentral services. We also offer information regarding the data protection policies, processes, and controls established and operated by RingCentral.

Our Privacy Program

RingCentral has a robust global privacy program led by our Chief Privacy Officer.

Our privacy program is designed to implement the following principles:

- Accountability
- Transparency
- Data Minimization
- Privacy by Design and Default
- Protection of Data Subject Rights
- Data Security
- Safeguards of Data Transfers

For more information about our privacy program, visit our <u>Trust</u> <u>Center</u>.

Our Data Protection Officer

RingCentral's registered Data Protection Officer:

HewardMills Ireland Ltd. Fitzwilliam Hall, Fitzwilliam Place, Dublin 2 DO2 T292 Ireland

privacy@ringcentral.com

How our services fit with the General Data Protection Regulation

RingCentral processes personal data on behalf of our customers as a data processor on the basis of a data processing addendum (DPA) that aligns with the requirements of Article 28 of the General Data Protection Regulation (GDPR).

We act as a data controller for certain personal data, such as usage data, when we provide electronic communications services. It has long been acknowledged and accepted that electronic communications service providers may process certain personal data as data controllers. This is necessary for us to comply with applicable laws, to manage our operations, including billing, and to improve our services to our customers.

Usage data, generally, is metadata relating to communications and could include phone numbers, dates, time, and types of communication (e.g., phone call, message, fax, etc.).

For more information about our data processing as a data controller, please see our whitepaper, RingCentral as a Data Controller.

As a data controller, RingCentral complies with our transparency obligations through our online privacy notices:

- RingCentral Privacy Notice
- RingCentral Video Privacy Notice
- RingCentral Children's Privacy Notice and School/Parental Notification

Global Privacy Legislation Compliance

For more information on how we comply with privacy laws around the world, please visit our <u>Trust Center.</u>

Data Transfers

RingCentral is a global company and we may need to transfer personal data out of the customer's home region. We store communication content, such as voicemail, messages, video recording, and fax messages in the region where the RingCentral account is established.

RingCentral is committed to comply with applicable data protection laws on the transfer of personal data from the following areas:

- The European Economic Area (EEA)
- Switzerland
- The United Kingdom (UK)
- Any country that has implemented data transfer restrictions

We have put measures in place to ensure these data transfers are conducted in compliance with applicable data protection laws. When transferring personal data out of the EEA, UK, and Switzerland we rely on the applicable EU Standard Contractual Clauses (SCCs).

RingCentral has performed and maintains data transfer risk assessments relating to the transfer and remote access of personal data from outside the EEA, UK, and Switzerland. As a result, RingCentral implements additional security measures to ensure that the personal data we need to transfer are being adequately protected.

For more information about how RingCentral protects the personal data it transfers, please refer to the following:

Personal Data Transfer Impact Assessment: FAQ

Transparency Report

RingCentral is committed to maintaining the privacy and trust of our customers by giving full visibility into required disclosures to government agencies. Our <u>Transparency Report</u> describes how we respond to requests for customer data submitted by law enforcement and government agencies around the world.

For any questions related to our Transparency Report, please contact transparency@ringcentral.com.

Subprocessors

We rely on subprocessors to provide some of our services. We have an established process to inform our customers and partners whenever we add new subprocessors. For more information, please visit our RingCentral Subprocessor List.

RingCentral requires all its subprocessors to sign a data processing agreement equally protective as those it enters into with its customers. Our subprocessors have also signed the applicable SCCs for the transfer of personal data out of the EEA, UK, and Switzerland.

Data Subject Rights

Under applicable data protection laws, individuals have rights with respect to their personal data. These rights include the right to

download and access personal data, the right to correct inaccurate data, and the right to data deletion. Generally it is the responsibility of organizations who use our services to respond to data subject requests. Some RingCentral services may provide means for organizations using those services to respond to requests from data subjects. If the organizations are unable to address the data subject's request, RingCentral will provide reasonable assistance. If a data subject request is made directly to RingCentral, RingCentral promptly directs the data subject to contact the organization acting as the data controller. RingCentral Data Subject Request Center enables data subjects to submit requests to exercise their rights. Additionally, RingCentral has a designated email address, privacy@ringcentral.com, to assist data subjects in their requests. Please visit RingCentral's Data Subject Request Center to learn more. **Data Protection Impact** RingCentral endeavors to assist its customers in conducting data Assessments protection impact assessments (DPIAs) in relation to RingCentral's services. RingCentral will also assist as part of customer's consultations with data protection authorities as required. Security Incidents and RingCentral has processes in place that allow us to notify without Data breaches undue delay our customers of any security incident that impacts the confidentiality, integrity or availability of the data we process as part of our services. RingCentral will deploy every effort to contain, mitigate, and remediate such security incidents. Security is a MUST at RingCentral has invested in implementing the highest standards of security as evidenced by the list of our certifications available at RingCentral https://www.ringcentral.com/trust-center/compliance.html. Contact Us Privacy Department: privacy@ringcentral.com More Resources Trust Center: https://www.ringcentral.com/trust-center.html#privacy

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