

Data regulation

Data collection by ALE DECT Solutions:

- Handsets: 8214 DECT, 8234 DECT, 8244 DECT, 8254 DECT, 8262/EX DECT
 - With ALE DECT Bases 8378, 8379, 4070
- Handsets: 8214 DECT, 8234 SIP-DECT, 8244 SIP-DECT, 8254 SIP-DECT, 8262/EX SIP-DECT
 - With ALE SIP-DECT Bases 8328, 8368

The manufacturer bears sole responsibility for issuing this declaration.

The manufacturer **ALE International**
 32 avenue Kleber, Colombes 92700 FRANCE

hereby declares that the above listed products comply with the relevant harmonization legislation of the European Union:

2023/2854 Data Act: Regulation on harmonized rules for fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Regulation)

The following local data may be generated, collected or logged by the above listed ALE products:

Data Output	Data type (Data Act: product data)	Description	Format	Access Method	Storage Location	Retention Period	GDPR Considerations
Operational logs: boot logs, firmware state, system events, diagnostics	Machine data automatically produced	Not enabled by default. May be accessed solely upon customer request for troubleshooting purposes.	Text	Base: WBM admin Handset: specific tool via serial port	Local in base (except if syslog server is setup by admin) and in handset	Local: limited circular storage External: until admin deletes	Can include personal data
Telemetry: CPU/memory load, device health, uptime	Machine data automatically produced	May be accessed solely upon customer request for troubleshooting purposes.	Text	Base: WBM admin Handset: UI	Local in base and in handset	Limited circular storage	No personal data
Product data: Base: Ethernet mac@, S/N, HW version, RFPI Handset: IPEI, Serial Number, HW version, BT@	Product data	Product components identification	Text	Base: WBM admin Handset: UI	Local	Cannot be changed/deleted	Can include personal data
Network info: IP@, VLAN ID, LLDP, DNS, DHCP	User-created data	Used for network connection for the base	Text	Base: WBM admin	Local	Until admin changes/deletes	Can include personal data

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Data Output	Data type (Data Act: product data)	Description	Format	Access Method	Storage Location	Retention Period	GDPR Considerations
QoS metrics: Base: latency, jitter, packet loss, MOS Handset: radio metrics	Machine data automatically produced	Used to monitor Quality of Service	Text	Base: WBM Admin Handset: UI	Local	Base: limited circular buffer (24h) Handset: transient	No personal data
Call metadata: call start/end time, dialled number, caller ID, call duration	User-created data	Used for Call log feature	Text	Base: WBM Admin Handset: UI	Local (SIP) Call Server (AGAP)	Limited circular buffer or until user deletes	Can include personal data
Contacts: corporate or user-provided lists	User-created data	Used for Contact feature	Text	Base: WBM Admin Handset: UI	Corporate: Server or Base User: Local (SIP), Call Server (AGAP)	User contacts: until user deletes Corporate contacts: until admin deletes	Can include personal data
Preferences: display language, ringtones, shortcuts (Prog keys)	User-created data	User personal settings	Text	Base: WBM Admin Handset: UI	Local handset & base (SIP) or Call Server (AGAP)	Until user deletes or changes	Can include personal data
Call signalling	User-created data	Call exchanges identifying devices, users or states (forwarding, DND, ...)	Binary	None (transient, except for states)	Local base (SIP), Call server (AGAP)	Until call ends or until user deletes or changes	Can include personal data
Audio incoming & outgoing	User-created data	Audio information	Binary	Handset: UI	Audio or payload data is not persistently stored	Until call ends	Can include personal data
User account: pin code, phone number, full name	User-created data	Used for access control and user identification	Text (clear/hashed)	Base: WBM Admin Handset: UI	Pin code is local handset, others are Local base (SIP) or Call Server (AGAP)	Until admin deletes or changes	Can include personal data
Admin account: credentials (login/pass)	User-created data	Used for admin access control	Text (clear/hashed)	Base: WBM admin	Local base	Until admin changes	Can include personal data
Configuration	User-created data	Corporate level configuration	Text (clear/hashed)	Base: WBM Admin Handset: UST external tool	Local handset (AGAP) Local base (SIP) or Call Server (AGAP)	Until admin deletes or changes	Can include personal data
SW version	User-created data	Software version running	Text	Base: WBM admin	Local	Until admin changes	No personal data
Alarm / Notification	User-created data	Alarm generation (number, location)	Text	Handset: UI	Local (SIP) Call Server (AGAP)	Limited circular buffer or until user deletes	Can include personal data
Location	Machine data automatically produced	Location generation (number, RFPI, BT Beacon)	Text	None (transient, not exposed via UI)	Transient	Transient	Can include personal data
Messaging	User-created data	Used for Messaging service	Text	Handset: UI	Local (SIP) Call Server (AGAP)	Limited circular buffer or until user deletes	Can include personal data

The presence of personal data within certain datasets does not alter their qualification as product data under Regulation (EU) 2023/2854. Personal data processing remains subject to Regulation (EU) 2016/679 (GDPR).

Signed on behalf of the manufacturer:

Nicolas Brunel President of ALE International

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Nicolas Brunel
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1/20/2026

Data regulation

Data collection by:

- ALE Essential Desk Phones: ALE-20/20h/30/30h
- ALE Enterprise Desk Phones: ALE-300/400/500

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2023/2854 **Data Act: Regulation on harmonized rules for fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Regulation)**

The following local data may be generated, collected or logged by the above listed ALE products:

Data Output	Data type (Data Act: product data)	Description	Format	Access Method	Storage Location	Retention Period	GDPR Considerations
Operational logs: boot logs, firmware state, system events, diagnostics	Machine data automatically produced	Not enabled by default. May be accessed solely upon customer request for troubleshooting purposes.	Text	Admin command line	Local: default External syslog server: if setup by admin	Local: limited circular storage (data overwritten) External: Until admin deletes	Can include personal data
Telemetry: CPU/memory load, device health, uptime	Machine data automatically produced	Not enabled by default. May be accessed solely upon customer request for troubleshooting purposes.	Text	Admin command line	Local	Transient data	No personal data
Product data: Ethernet/Wifi/BT mac@, Serial Number, HW version, BT handset mac@	Product data	Product components identification	Text	UI or Admin command line	Local	Cannot be changed/deleted	No personal data
Network info: IP@, VLAN ID, LLDP, DNS, DHCP, VPN, Wifi credentials	User-created data	Used for network connection	Text (clear/hashed)	UI or Admin command line	Local	Until user or admin changes/deletes	No personal data

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Data Output	Data type (Data Act: product data)	Description	Format	Access Method	Storage Location	Retention Period	GDPR Considerations
QoS metrics: latency, jitter, packet loss, MOS, ...	Machine data automatically produced	Used to monitor Quality of Service	Text	Admin UI or command line	Local	Transient data	No personal data
Call metadata: call start/end time, dialled number, caller ID, call duration	User-created data	Used for Call log feature	Text	User UI	Local (SIP) Call Server (NOE)	Until user deletes	Can include personal data
Contacts: corporate or user-provided lists	User-created data	Used for Contact feature	Text	User UI	Corporate: Server User: Local (SIP), Call Server (NOE)	User contacts: until user deletes Corporate contacts: until admin deletes	Can include personal data
Preferences: display language, display skin, ringtones, shortcuts (Prog keys)	User-created data	User personal settings	Text	User UI	Local (SIP) or Call Server (NOE)	Until user deletes or changes	Can include personal data
Call signalling	User-created data	Call exchanges identifying devices, users or states (forwarding, DND, ...)	Binary	None (transient, not exposed via UI)	Local (SIP) Call Server (NOE)	Until call ends or until user deletes or changes	Can include personal data
Audio incoming & outgoing	User-created data	Audio information	Binary	User UI	Audio or payload data is not persistently stored. Temporary recording may occur exclusively upon explicit user or administrator action for diagnostic purposes.	Transient data	Can include personal data
User account: credentials, phone number, full name, pin code	User-created data	User access control and user identification	Text (clear/hashed)	Admin command	Local (SIP) or Call Server (NOE)	Until admin deletes or changes	Can include personal data
Admin account: credentials	User-created data	Admin access control	Text (clear/hashed)	Admin command	Local (SIP) or Call Server (NOE)	Until admin changes	Can include personal data
Phone global configuration	User-created data	Corporate level configuration	Text (clear/hashed)	Admin command	Local (SIP) or Call Server (NOE)	Until admin deletes or changes	Can include personal data
SW version	User-created data	Software version running	Text	Admin command	Local	Until admin changes	No personal data
Messaging	User-created data	Messaging service	Text	User UI	Local (SIP) or Call Server (NOE)	Limited circular buffer or until user deletes	Can include personal data

The presence of personal data within certain datasets does not alter their qualification as product data under Regulation (EU) 2023/2854. Personal data processing remains subject to Regulation (EU) 2016/679 (GDPR).

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Nicolas Brunel President of ALE International

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1/20/2026

Data regulation

Local data collection by:

Alcatel-Lucent OmniPCX Enterprise Communication Server

The manufacturer bears sole responsibility for issuing this declaration.

The manufacturer **ALE International**
32 avenue Kleber, Colombes 92700 FRANCE

hereby declares that the product OmniPCX Enterprise Call Server complies with the relevant harmonization legislation of the Union:

2023/2854 Data Act: Regulation on harmonized rules for fair access to and use of data and amending Regulation (EU) 2017/2394 and Directive (EU) 2020/1828 (Data Regulation)

The following local data is collected and logged by the OmniPCX Enterprise Call Server:

Data	Call Detail Records (accounting tickets)
Data Act Category	Product data
Description	Reference: 8AL91048ENAD - OXE System: Advanced Configuration §11 Accounting CDR are automatically generated data log produced for every call including time, duration, source/destination numbers, status and billing information. CDR are filtered out according to the system configuration.
Format	Compressed ASCII files SQL database
Access method	Real time export over ethernet (legacy protocol) to an external accounting application Download over SSH/SFTP Local tools: account, accview, accreport
Storage location	Local hard drive: /DHS3dyn/account/TAXxxxxx.DAT
Retention period	Retention period of compressed ASCII files is configurable (default 31 days, max 99 days)
Data volume	Capacity for database storage is configurable up to 3049 Mo At most 4572 compressed ASCII files

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GDPR consideration	System can be configured to mask: <ul style="list-style-type: none"> • user PIN code • last digits of called numbers
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Data	Alarms / Incidents
Data Act Category	Product data
Description	<p>Reference: 8AL91011ENBD - OXE System: Maintenance §6 Management of incidents and alarms</p> <p>The system collects and store incidents mainly for troubleshooting. Incidents include:</p> <ul style="list-style-type: none"> • Timestamp • Equipment identifiers • Severity • Incident identifier • Text description <p>Incidents can be stored or routed in real time to different channels: SNMP traps, SYSLOG, Console...</p> <p>Incidents are filtered out and routed according to the system configuration.</p>
Format	Compressed ASCII files
Access method	Real time export over SNMP (traps), SYSLOG Download over SSH/SFTP Local tools: incvisu, incinfo
Storage location	Local hard drive: /DHS3dyn/incid
Retention period	No limit
Data volume	<p>Storage of incidents is configurable with tool inconf</p> <p>Refer to 8AL91011ENBD - OXE System: Maintenance §2.17 inconf</p> <ul style="list-style-type: none"> • Max number of incidents per file • File size • Number of files • Number of backup sessions
GDPR consideration	

Data	System statistics
Data Act Category	Product data
Description	<p>Reference: sysstat(5) Linux manual page</p> <p>The system collects raw statistics about system performance and usage activity such as CPU load, memory usage, hard disk usage, network interfaces...</p> <p>The data are provided by the sysstat's set of tools commonly available in Linux. These data can be analyzed by external applications like ksar, SARchart.</p>
Format	Compressed ASCII file
Access method	Download over SSH/SFTP
Storage location	Local hard drive: /var/log/sa
Retention period	1 year
Data volume	<p>1 file per day (# 20 Mo)</p> <p>Files are archived and compressed at the end of the month (# 30 Mo)</p> <p>12 months => # 360 Mo</p>
GDPR consideration	No personal data

Data	Audit logs (telephony application)
Data Act Category	Related service data
Description	Reference: 8AL91012ENBD - OXE System: Security §2.3 Logging

	Configuration changes of the telephony application. All modifications of the application's data model are logged including: <ul style="list-style-type: none"> • Timestamp • Initiator • Type of action (Create, Update, Delete) • Modified values
Format	ASCII files ASN1 files (mao_hdet)
Access method	Local tool: maohist Download over SSH/SFTP Real-time export over UDP (format?)
Storage location	Local hard drive: /DHS3data/mao/mao_log_hist /DHS3data/mao/mao_hist /DHS3data/mao/mao_ch_hist /DHS3data/mao/mao_hdet /DHS3data/mao/list_fhdet.txt
Retention period	
Data volume	10000 last actions / 1 backup # 2,5 Mo x 2
GDPR consideration	Sensitive data are masked (secret code, email address...)

Data	Backup Telephony application & Linux
Data Act Category	Related service data
Description	Periodic backup of mao data and Linux data.
Format	Binary
Access method	Download over SSH/SFTP Can be stored on a remote server
Storage location	Local hard drive: /DHS3dyn/BACKUP Remote server over SSH/SFTP
Retention period	3 months (rotation)
Data volume	# 70 Go (12 backups, # 6 Go each)
GDPR consideration	

Data	Traffic observation
Data Act Category	Product data
Description	Statistics of system performance and usage of resources (trunks, trunk groups, attendants, call distribution...)
Format	Compressed ASCII files
Access method	Download over SSH/SFTP
Storage location	Local hard drive: /DHS3dyn/pmm
Retention period	Configurable Max 1 year
Data volume	Configurable Max 1488 of half-hour statistics (# 0.5 Ko) + 365 daily statistics (#1 Ko) => # 1 Mo
GDPR consideration	No personal data

Data	Audit logs (System)
Data Act Category	Product data
Description	Logs of configuration changes and administrative operations performed

Format	ASCII files
Access method	Download over SSH/SFTP SYSLOG redirection (UDP / TCP / TLS)
Storage location	Local hard drive: /var/log Remote server over SYSLOG (UDP / TCP / TLS)
Retention period	Log rotation
Data volume	Dedicated partition (with HD 80 Go: 2 Go / HD 100 Go: 3 Go)
GDPR consideration	No personal data

Data	VoIP quality records
Data Act Category	Related service data
Description	8AL91011ENBD - Ed. 2 - October 2025 - OXE System: Maintenance \$9 VoIP quality supervision VoIP quality statistics (jitter, packet loss...) of IP NOE phones
Format	binary
Access method	Download over SSH/SFTP
Storage location	Local hard disk: /DHS3dyn/account/IPBBxxx.DAT
Retention period	configurable from 1 to 99 days
Data volume	limited to 4752 files
GDPR consideration	No personal data (IP address)

Data	SIP VoIP quality records (VQR)
Data Act Category	Related service data
Description	8AL91011ENBD - Ed. 2 - October 2025 - OXE System: Maintenance \$9 VoIP quality supervision VoIP quality statistics (jitter, packet loss...) collected from SIP phones
Format	ASCII files
Access method	Download over SSH/SFTP
Storage location	Local hard disk: /DHS3dyn/account/SIPxxxx.DAT
Retention period	configurable from 1 to 99 days
Data volume	limited to 4752 files
GDPR consideration	No personal data

Data	Phonebook
Data Act Category	Product data
Description	Reference: 8AL91003ENBC - OXE System: User Services \$31.3 List of user names or speed dialing names with phone numbers used for identification or dial by name.
Format	SQL database
Access method	System administration applications (MGR / WBM / 8770)
Storage location	Local hard drive
Retention period	Until deleted by the administrator
Data volume	estimation of 1400 bytes per entry
GDPR consideration	Association of names and phone numbers

Data	Call log
Data Act	Related service data

Category	
Description	Reference: 8AL91003ENBC - OXE System: User Services \$20 Call log List of answered and unanswered incoming and outgoing calls of users.
Format	SQL database
Access method	From the user's device / application
Storage location	Local hard drive
Retention period	Configurable (unlimited or max 90 days)
Data volume	Configurable (number of records) Max 100 per user
GDPR consideration	Yes

Data	Voice messages (4645 VMS)
Data Act Category	Product data
Description	Messages stored in the user's voice mailbox including metadata (timestamp, caller's identity)
Format	Legacy
Access method	From the user's device / application Can be included in backup (metadata only or with messages)
Storage location	Local hard drive Dedicated partition /vmu (20 Go)
Retention period	Configurable (max 1 year)
Data volume	Configurable: <ul style="list-style-type: none"> • Number of messages per mailbox (max 100) • Max message length (max 18000s)
GDPR consideration	Yes

Data	Contact Center Distribution (CCD) tickets and statistics
Data Act Category	Related service data
Description	References: 8AL91301ENAI CC Distribution \$4 Traffic observation on hard disk TC 1066 Communication Ticket & Local Statistics The ACD Front End (AFE) records communication tickets and compiles detailed statistics related to call center operations, such as call history (timestamp, destination, ringing/waiting time...), agent activity (login/logout/withdraw...) and distribution metrics.
Format	Binary Refer to TC 1066 for detailed description
Access method	CCS (Call Center Supervision) application Download over SSH/SFTP
Storage location	Local hard drive /DHS3dyn/afe
Retention period	CCD communication tickets: 7 days CCD daily statistics: configurable (max 12 months) CCD detailed statistics: configurable (max 5 weeks)
Data volume	Data volume depends on the CCD's traffic. Assumptions for volume evaluation: <ul style="list-style-type: none"> • Peak period day of 12h 30min.: namely 50 statistical periods of ¼ hour • 4000 calls/hour, namely 1000 calls per period and 50000 calls per day 5 pilots, 5 queues, 5 processing groups and 200 agents CCD communication tickets of the day: # 5 Mo CCD communication tickets archive (compressed): # 1 Mo / day

	CCD detailed statistics: # 120 Ko / week CCD daily statistics (compressed): # 2 Mo / month
GDPR consideration	No

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