Gamma MiFID Call Recording on Horizon

Service Description

Contents

Revision History

Revision	Date	Decription of Change
1.0	17/01/18	Initial Release

Introduction - MiFID Call Recording on Horizon

Gamma has integrated Horizon with a comprehensive suite of call recording capabilities that will support the deployment of MiFID compliant services. The service offers the ability to record calls and delivers an intuitive, secure and compliant user portal in order to search and playback recordings encompassing fixed line and mobile call recording (through Horizon Connect).

Suitable for MiFID II Compliance

The regulations require that recordings are held for a default period of 5 years. This can be extended by a further two years if required. E.g following a request from the regulating body. Recording retention periods are fully configurable and controlled by the admin user.

Recordings offer full visibility of call properties e.g timestamp, calling parties and associated meta-data in Horizon. Specific compliance features include:

- Store calls for up to seven years
- Record Internal and External calls (ext-to-ext)
- Encrypted secure storage
- "Audit trail"
- Ability to add notes and amendments to records
- Stored in a durable medium
- Readily accessible and available to clients - download direct from the browser
- Complies to BS10008 (evidential integrity of recordings)
- Call recording is provisioned for a user, so a user with multiple Horizon numbers (Fixed and Connect mobile) will have all of their calls recorded

Service Platform Overview

Platform Configuration

The Call Recording Service is delivered from a private cloud hosted hosted across two geographically diverse sites in the UK. Each site is provisioned to accommodate the full traffic and load should one site fail, with thesites operating in Active-Active configuration.

For 24/7 operation, the business-as-usal security patching and software upgrades are orchestrated by automated systems so that systems are drain-stopped, patched and re-introduced with no down time.

Platform Integration

The Call Recording cloud is connected to Gamma's core network via two geographically diverse interconnects operated on an Active-Standby basis, provisioned on a load-balanced geographically resilient pair of SBCs.

Each Gamma SBC is configured with a Telco and Enterprise Endpoint.

- The Telco side endpoint facing PSTN (to route traffic to/from PSTN).

- The Enterprise side endpoint facing Customer SIP Endpoint (to route traffic to/ from Customer SIP Endpoint).

Gamma will implement service routing via the Call Recording Service Platform so that in-scope calls (inbound/ outbound and internal [extension to extension]) can be configured to enable recording. The diagram below shows basic call flows:
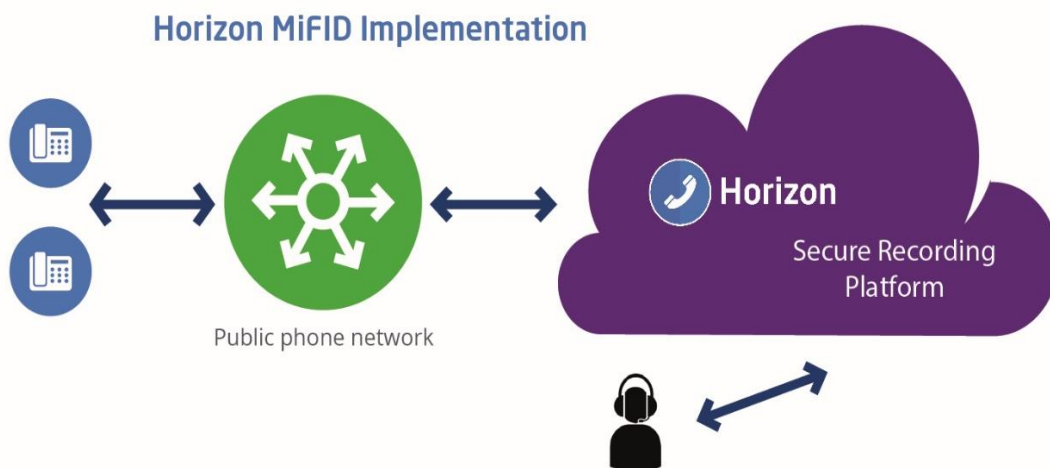
Call Recording Consumption Model

Utilising SIPREC as a standard mechanism for call recording on Horizon brings with it a rich integration capability, access to metadata and ensures all of the calls that a user makes or receives on Horizon will be recorded. This includes their desk phone, soft client and Connect mobile along with all inbound, outbound and internal calls (extension-to-extension) made or received on these devices.

A fundamental feature is making the Call Recording User the central aspect to the service, and not a specific number. As a result, there are some things to consider when configuring the service for use:

- The need to provision Call Recording for a user to ensure all of their calls are recorded. If a user is not provisioned for call recording, their calls will not be recorded - even if they are part of a hunt group or transferred leg of a call from a user who has Call Recording provisioned. To record all of the calls for a group feature (such as Hunt Group or Auto Attendant) each user that can receive calls from that group feature needs to be provisioned with Call Recording.

- A call is recorded whilst a user with call recording is provisioned, regardless of device or Horizon interface.

- Transferring or forwarding a call to a user (either on the company Horizon or outside of the company) will only be recorded if the user the call is transferred to has call recording enabled. A Call Recording user's Horizon mobile / Connect will have calls recorded; however if the user takes a call on a non-Horizon mobile (using twinning or sequential ringing for example) these calls will not be recorded.

- Additional bandwidth may be required as all calls are routed through the platform.

MIFID II Call Recording - Feature Matrix

Compliance

Retention (included)	7 Years
Suitable for MiFID II Compliance	Yes
BS10008 (Evidential Integrity)	Yes
Audit History	Yes
Audit Extract	Yes
Call Extract	Yes
User Group Controlled Access (site and own recordings)	Yes

Playback and Download

Playback Call in Browser	Yes
Adjust Playback Speed	Yes
Download Call in browser	Yes
Search	Yes
Time Explorer	Yes
Visualisation of Transferred Calls	Yes

Miscellaneous

Comments and Tagging	Yes
Contacts	Yes

Features and Benefits of Recording

Feature	Business Benefits
Inclusive Retention Period Strategic deployments will include an inclusive retention of period of up to 7 years (MiFID II).	No hidden costs so easy for business to calculate outgoings. Enterprise package Covers MiFID II compliance requirements on retention (5 years minimum plus an optional 2 years) for financial sectors.
BS10008 Compliant Evidential Integrity of Recordings	Customers' recordings are admissible in a UK court of law.
Audit History Recording access and management logs	Provides onscreen history and data extracts for business compliance requirements.
Call Playback Browser support for call playback without plugins	Fast call playback in all major browsers.
Call Download Browser support for call downloads	Easy access to download a call recording in MP3 format.
Search Search recordings	Powerful, fast searching across all recordings.
Call Extract Extract is available to download in CSV format, showing all call details over a given time period.	Reconcile recorded call volumes for compliance purposes.
Time Explorer Data visualisation of recordings.	View trends and highlight anomalies in call patterns.
Comments and Tagging Add comments and #tags to recordings.	Enables business process workflow for compliance.
Contacts Customer and staff management	Enhance search and recording management with contact information.

Encryption

Call recordings are encrypted before they are saved to the disk with 128 bit encryption. They are decrypted as they are streamed for playback or downloaded. At no time are they permanently stored unencrypted on disk. This ensures compliance to BS10008 (evidential integrity of recordings).

BS10008 (Evidential Integrity of Recordings)

The solution is BS10008 compliant, meaning customers' recordings are admissible in a UK court of law.

In addition to this, the Service Platform is ISO 20000 compliant, ISO 27001 compliant, ISO 22301 compliant, Cyber Essentials certified, listed on the Cloud Security Alliance STAR registry and featured on the VISA Europe Merchant Agent list for the secure storage of PCI DSS sensitive call recordings.

End User Portal

Call recordings and user access controls are accessible through a secure (SSL certified) end user portal. The portal utilises a user authentication system based on username/password. Users will not be able to access the portal using existing Gamma portal credentials. Each customer shall have a unique URL in order to access their account and the URL will be provided at account set-up time to the Customer.

Access is controlled via a unique username (email address) and password. An appointed Super User shall be sent an email once the account has been created with a URL and a link to assign credentials. Clicking upon the link in this mail will prompt the user to set a password. From this point, all user management and access to the portal shall be conducted by the Customer.

Channel Partners shall have restricted access to the portal:they will have the ability manage users and access reports but will not have access to call recordings.

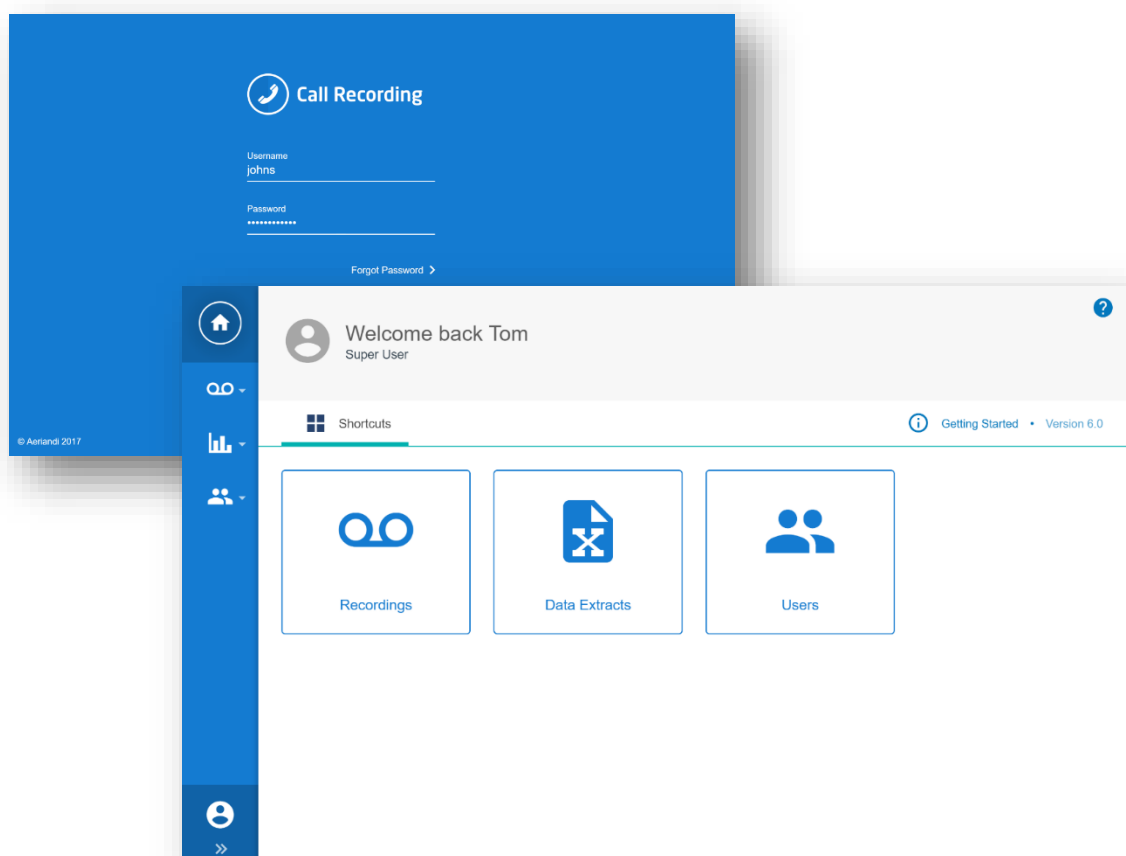The full user guide is available in the Call Recording User Portal.

Figure 1 Example Portal

Users

Super User Created Users

Creating a user that can access the Call Recording portal can be done in one of two ways:

- The Call Recording super user can create users by entering the required information.

- When a user starts making calls that are recorded, each Horizon user will be identified in the Call Recording meta data - the super user can then create a user from the call recordings.

Super User Controls

- A super user can only add users in their own account.

- Recordings are accessed and managed in the Call Recording portal.

- A super user is able to create users for the Call recording portal, and to assign the level of functionality they can use.

- To create a new user you must add:

  - Username

  - User's name, (given name, surname)

  - User's email address - this is the address to which the welcome email will be sent

  - In order to make a user who can listen to their own recordings, a User's Horizon ID must be entered

  - The Horizon ID cannot be edited

- Sites

  - Sites will be learnt for each User as calls are recorded (if a site is defined in Horizon) - the site defined for the user in Horizon is included in the call meta data, and is included as an attribute of the call, and of the user

  - If the Users' Site is edited in Horizon, when the next call is recorded the user's site is updated and all subsequent calls will be logged with the new site. Previous recordings will remain with the original site

- A user can be assigned to a policy from a list of policies - these are pre-defined profiles that determine the functionality a user can access

- A welcome email is sent upon assigning a policy to a user

  - A user can be created without a policy. At a later time the user can be assigned to a policy - this will trigger the sending of the welcome email

- The user creates their first password by following a link in the welcome email

- The email link times out after 24 hours

- A super user can resend the welcome email.

Controls by User Policy

By default, five user policies are created, under which users can be assigned different permissions:

- Super User - Full access to any configurable item.

- Admin User - User Administration only and no access to recordings.

- Recording User - Recording access across all users but no user administration.

- Simple Recording User - Limited access to recording screen only (typically used for own call recordings)

- Third Party Support User - Portal view only but no access to recordings in line with Data Protection regulation and potential implications of GDPR.

Users created for Call Recordings

As calls are recorded, Users are automatically added to the Recording Portal. E.g. The first time John Smith (Horizon User), makes a recorded call, a User called John Smith will be created within the Recording Portal along with the Site which John is associated with.

If any changes are made within Horizon, i.e. John's name is changed, or his site changes, this will be reflected within the Recording Portal the next time he makes a call.

In order to provide access to the Recording Portal to John, an Admin user will need to log into the Recording Portal, and 'upgrade' John to be a Portal user by assigning John a Policy. The Policy governs which features John will be able to access within the portal.

In order to upgrade a user, open the portal, navigate to the Users screen, find the User in question, right click and edit. There will then be an option to select a Policy and enter a Username and Email Address. There will also be the option here to define 'recording filters'. These govern which calls the User has access to. You will be able to select from one or more Sites and/or provide access to the User's own calls. Once edited, click 'Save Changes'. At this point, John will be sent an email with login instructions.

Note: the sites available within the Recording filters section will only list those sites which have been 'learnt' up until that point in time. i.e. if no calls have been recorded at that point, then no sites will be available to select from.

Users can also be set-up ahead of time. Navigate to the Users screen, click the 'Add User' button and enter the details provided including the Third Party Ref - this should be set to the same value as the Horizon User ID.

If the new User is assigned a policy at this point, then they will immediately be sent an email. If the desire is to set-up all users and have the emails sent at a later point, then create the user without a Policy, and follow the edit instructions above to assign the Policy at the point at which an email should be sent.

Example screenshots below show the welcome email and the User screen. Following the link in the welcome email will prompt the User to set a password.
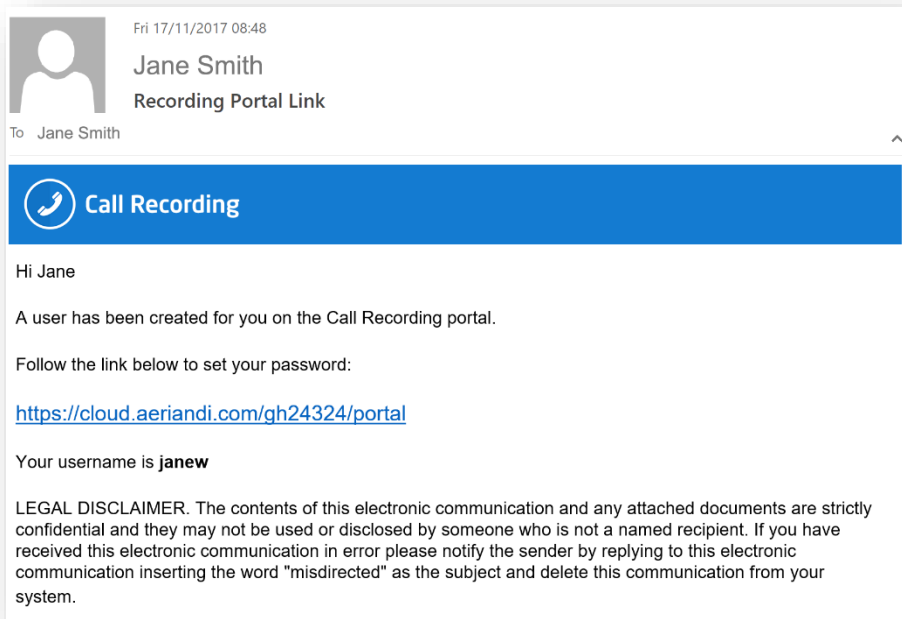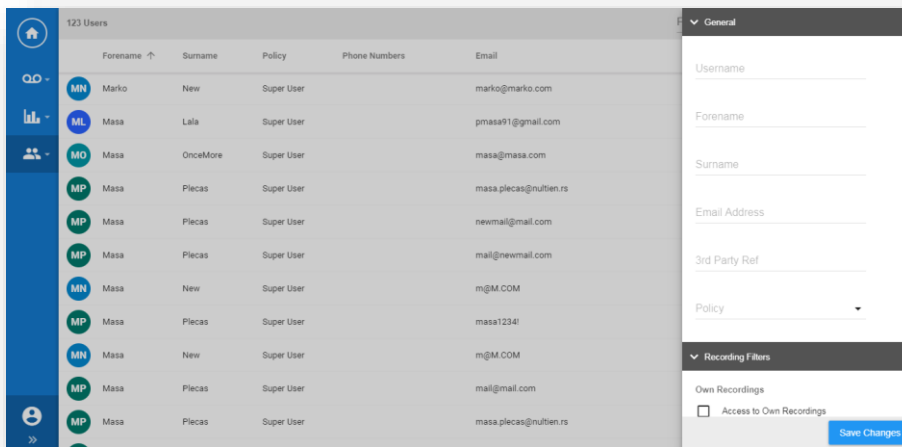
Figure 2 – Welcome email

Figure 3 – User Group Controlled Access

Note: Only an admin user will have the ability to add/amend user policies and their individual permissions. This will be specifically withheld for Channel Partners (unless enabled by the customer/data owner). Gamma support users will also be specifically withheld from this configuration to ensure compliance to GDPR i.e the ability to control access to recordings and assigned usage policies.

User Group Controlled Access

Call recordings are automatically associated with the user's site (as specified in Horizon).

User access to recordings may then be restricted to:

1. Only their own recordings
2. The recordings of all the users on the same site as themselves
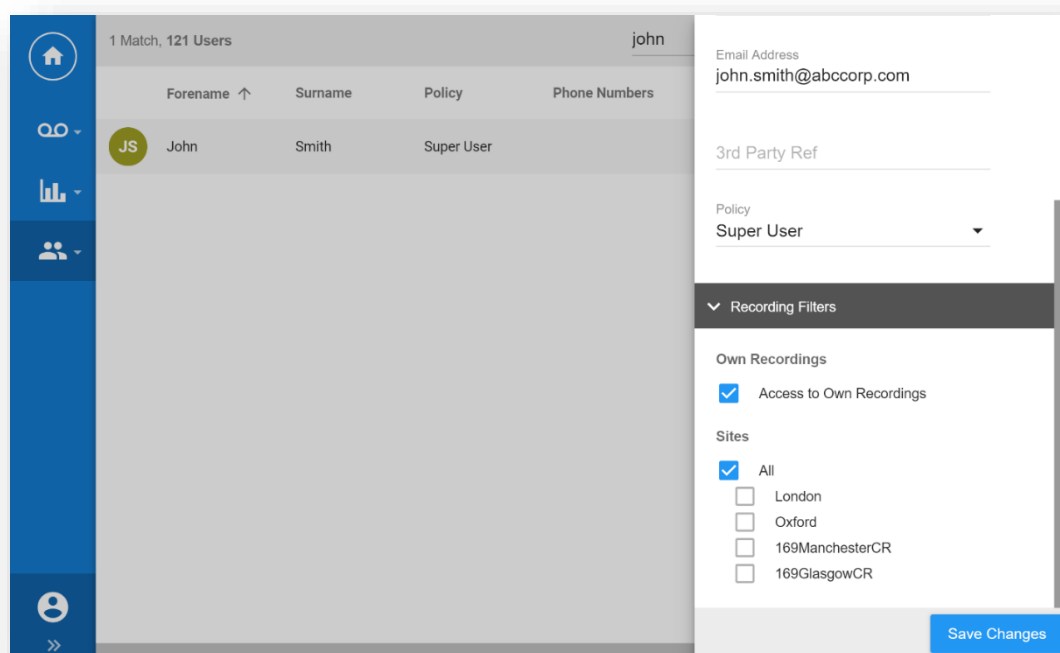3. The call recordings of all the users of one or more sites.

Figure 4 – User Group Controlled Access

Audit History

All user interaction with the portal is audited and available via the portal through standard view or downloadable via the Audit Extract tool. The Audit history within a recording shows all activity on the recording. This includes any playbacks, downloads and comments added.

An onscreen view of the Users' interaction with call recordings is available via the history tab of a call in the recordings page in the portal.
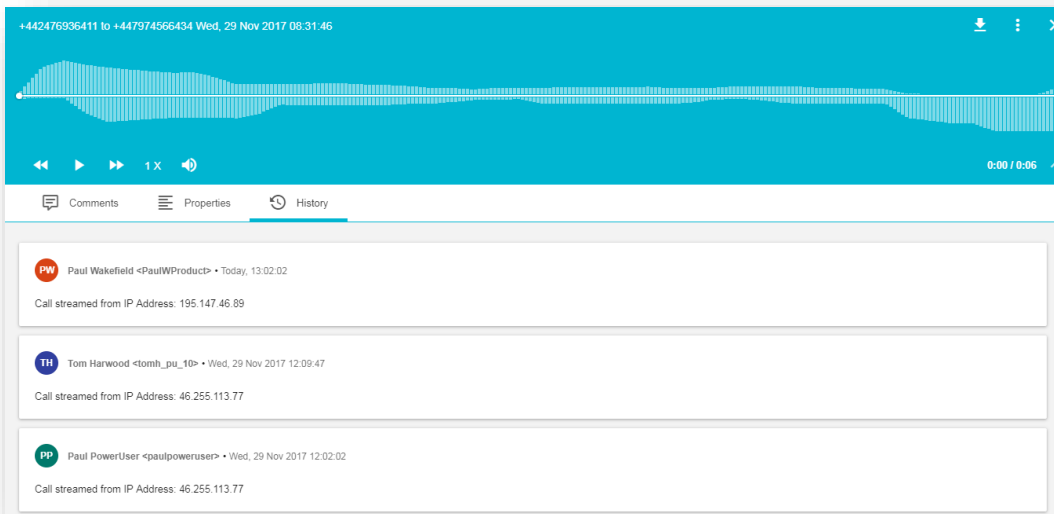
Figure 5 - Audit History

Properties

The properties tab contains all of the meta-data associated with the recording. In some circumstances, call sections are recorded separately (for example when calls are transferred). Where multiple call sections are recorded, all segments are listed within the properties tab and may be played in isolation by clicking on the 'Play' button at the bottom of each section of meta-data.

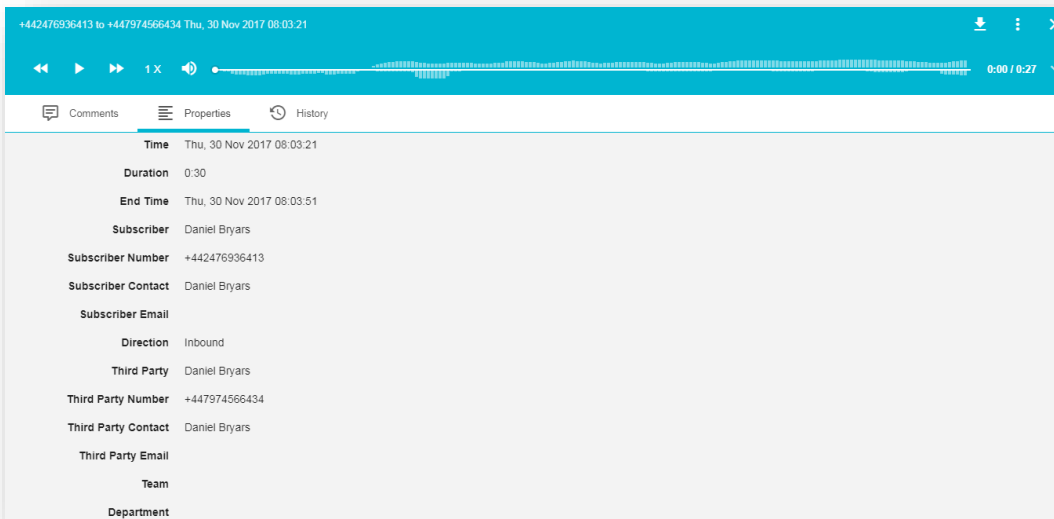Open the recording in the Maximised Player and select the 'Properties' tab.

Figure 6 – Properties

Gamma MiFID Call Recording on Horizon | Service Description

Audit Extract

Via the Data Extracts page, an extract is available to download in CSV format, showing all user interaction over a given period.
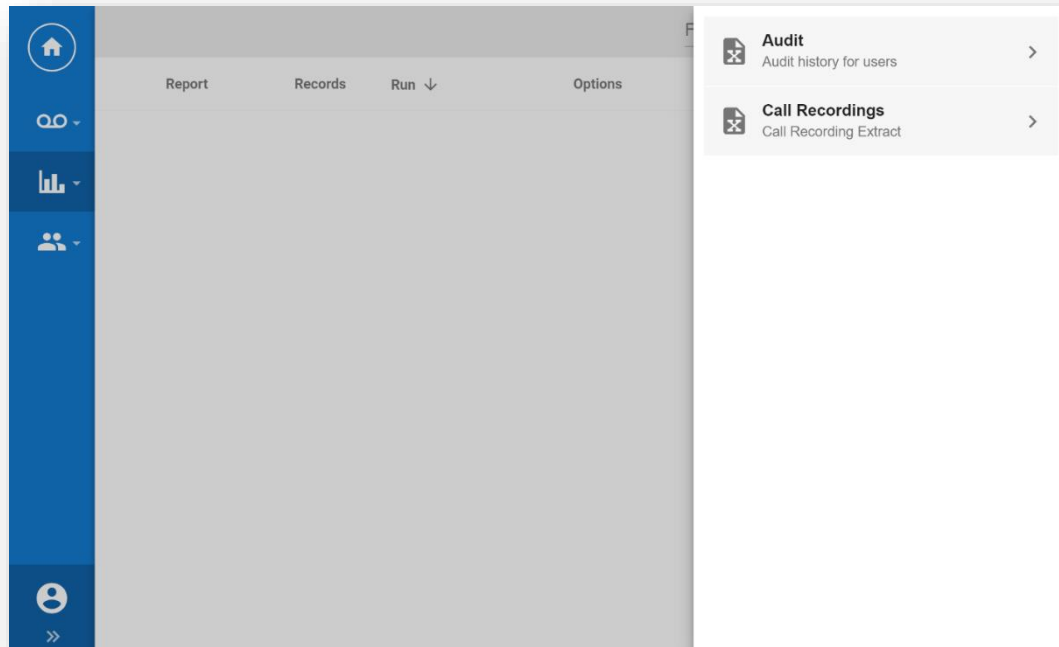

Figure 7 - Run Audit Extract

Audit Extract Fields are defined below:

Column Name	Description
Audit Event ID	A unique identifier for the audit event. E.g. 432342
Type	The type of audit event. This may be used as a parameter when running the report. E.g. 'CallStreamed' denotes a call that has been played back through the portal.
Entity ID	A unique identifier for the entity on which the audit event occurred. For example, should the event be 'CallStreamed', then the Entity Id would denote the unique identifier of the call in question.
Parent Entity ID	A unique identifier for the parent entity on which the audit event occurred. For example, should the event be 'CommentInsert' (which occurs when a comment is added against a call), the Entity Id would denote the unique identifier of the comment in question whereas the Parent Entity Id would denote the call to which the comment is attached.
Pan System Tracer ID	A unique identifier for the event in question that spans all parts of the system. E.g. 8150b8j1-c8d8-4d12-9c12-6d96294c9d75
IP Address	The IP address logged against the user's session, who caused the audit event. E.g. 112.136.80.321 Username The user who caused the audit event. E.g. joeb@abccorp.com
User Full Name	The user's name who caused the audit event. E.g. John Smith User Id The unique identifier of the user who caused the audit event. E.g. 3243554
Timestamp UTC	The UTC timestamp at which the event occurred in dd/mm/yyyy hh:MM format. E.g. 03/10/2016 13:25:26

Call Extract

An extract is available to download in CSV format, showing all call detail over a given time period.
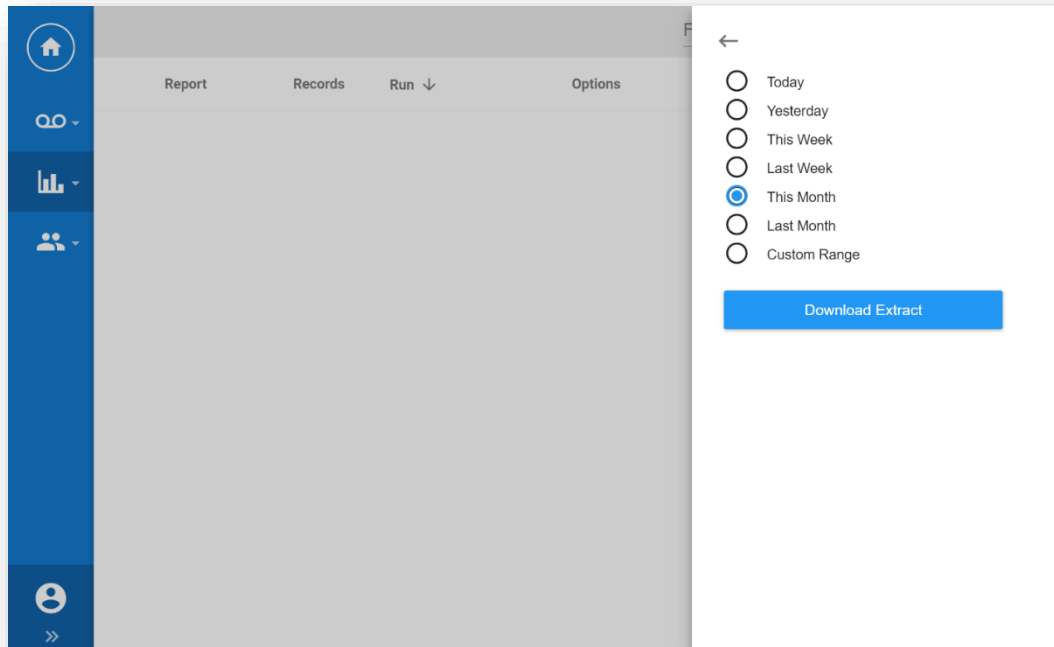

Figure 8 - Call Extract

Extract Fields are defined below:

| Column Name	Description
Type	Whether the interaction is a call. Values are CALL or SMS.
Recorded	YES or NO to indicate whether the interaction was recorded
Interaction ID	A unique identifer denoting the interaction. E.g. 543234534
Originator Number	The originating telephone number. No normalisation is applied. E.g. +447955453334
Originator Contact Name	The name of the contact that may be associated with the originating phone number. E.g. John Smith
Destination Number	The destination telephone number. No normalisation is applied. E.g. 01334243234
Destination Contact Name	The name of the contact that may be associated with the destination phone number. E.g. Jane Smith
Call Direction	Inbound,outbound or ext-to-ext
Call Start Date UTC	Interaction start time in UTC. E.g. 2014-12-21T12:56:21Z
Call End Date UTC	Interaction end time in UTC. E.g. 2014-12-21T12:56:21Z
Retention Date UTC	The date at which the call will be deleted
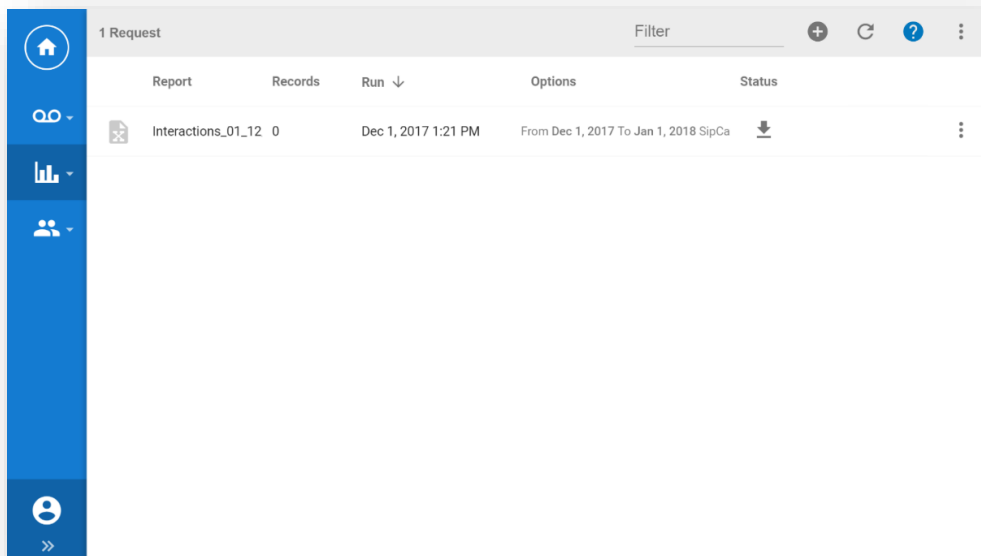
Figure 9 – Extract report

Playback Call in Browser

Calls are streamed to the browser in MP3 format. Click the 'Play' button that appears as the mouse is moved over each recording or select 'Play' from the row menu
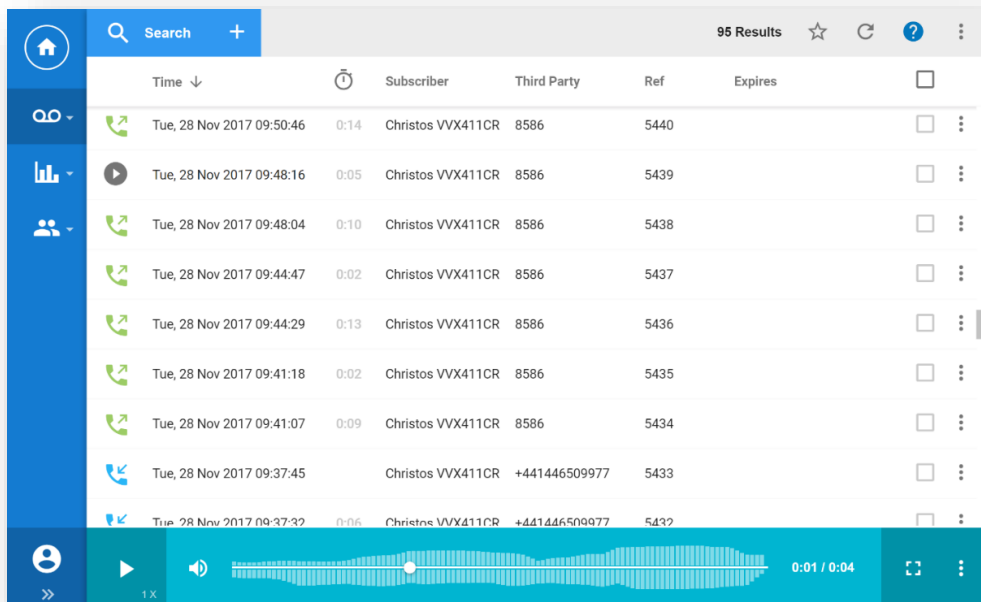

Figure 10 - Playback Call

Adjust Playback Speed

Calls may be played back at higher and lower speeds. The pitch is modulated so that the voices do not appear to be higher or lower in pitch during playback. This allows a User to listen to more recordings in a given time and is typically used by a compliance officer. Calls are limited in range to a minimum of half, to a maximum of double normal speeds as default, but can be increased as a bespoke development. Implement by right clicking playback speed - "2X" in example below:
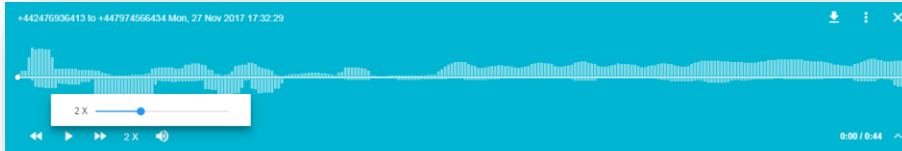
Figure 11 - Adjust Playback Speed

Download Call in Browser

Calls are downloaded in MP3 format. On average in MP3 format, 10 minutes represents 1MB of storage on your local computer.

Note: once downloaded, the user should be aware that the data is then outside of the applications control. This represents a security risk, as the call recording file can easily be shared (e.g. via email, file sharing site etc.) without an audit and access trail.

The filename is in the format:

(Date and Time) YYYYMMDDHHMMSS_FromNumber_ToNumber_AccountReference_RecordingReference.mp3
e.g. 20171116105731_+442476936407_5004_3740356_5224.mp3

Figure 12 - Call Download

Gamma MiFID Call Recording on Horizon | Service Description
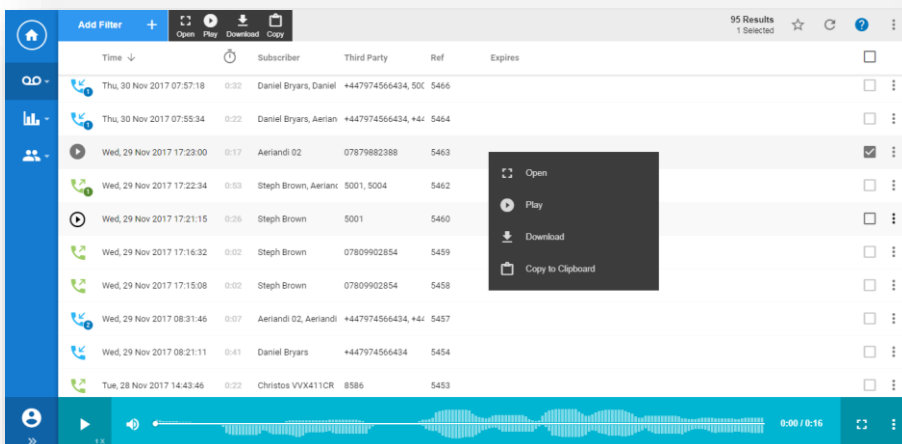
Search

Calls may be searched with any combination of meta-data fields:

- Timestamp of the start of the recording (range)
- Time of Day
- Duration Range
- Expiry (the date when the call will be automatically deleted)
- Phone Number
- Inbound / Outbound
- Ref Number (Service Platform reference)
- Phone User / Contact
- #Tag
- Site

Searching will return the top 1,000 rows and page up to 5,000 rows of data and calls may be filtered with any combination of meta-data fields.
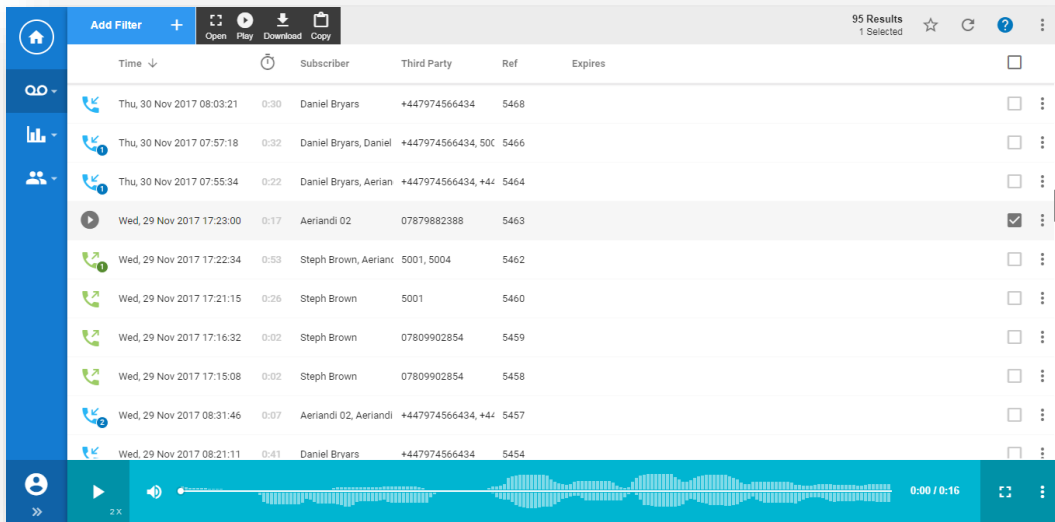
Figure 13 – Search

Visualisation of Transferred Calls

Sometimes a call may be transferred one or more times within Horizon creating multiple call legs for a single call with the customer. For calls which have multiple legs, these legs are 'rolled up' within the search results to a si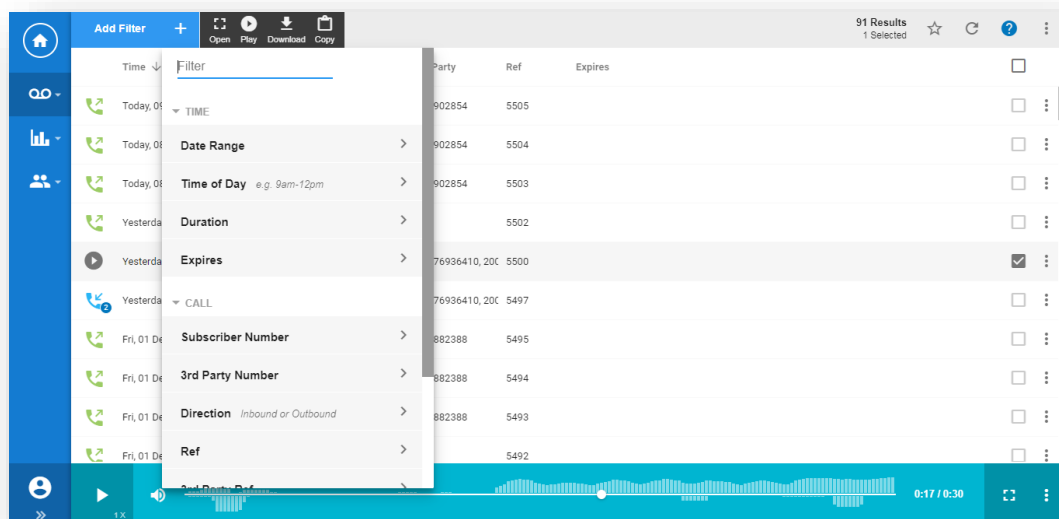ngle line. Each call leg representing a transfer may be played back separately in the call properties tab of the playback screen.

Figure 14 Search Results showing a "rolled up" call with transfers

Time Explorer

A Time Explorer view is available in order to visually browse the recordings. Each circle represents a call with the size governing the length of the call and the position showing the date and time of the call. This allows a user to quickly see when they are making and receiving calls, and for any correlation to the length of the call. E.g. this allows the user to easily view errant call activity such as calls made in the middle of the night.

Gamma MiFID Call Recording on Horizon | Service Description
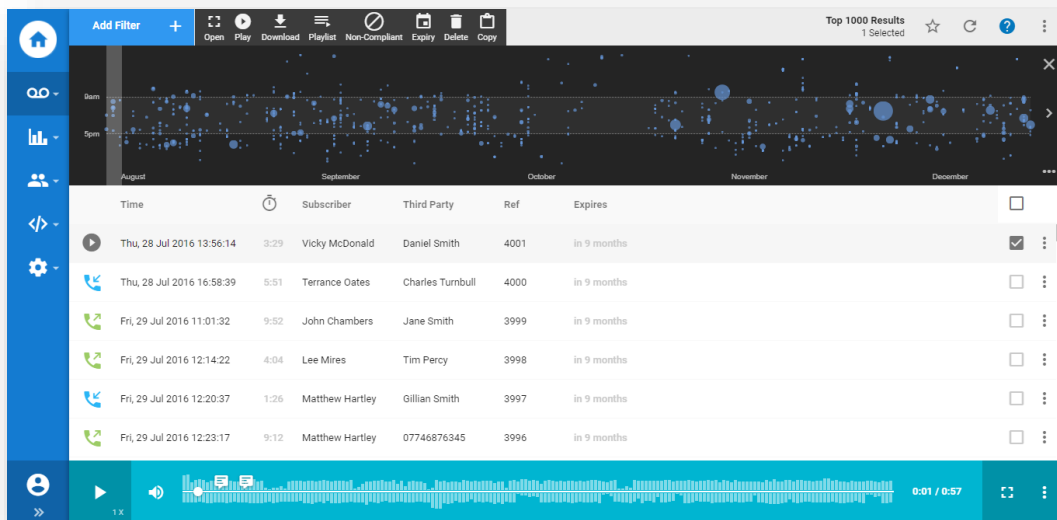
Figure 15 - Time Explorer

Comments and Tagging

Comments may be added to a call. When a comment is added, an indicator is added to the playback screen at the time that the comment is added. This allows a user to highlight with notes a part of the call for another user to view. E.g. @time 30s the user completes a trade.

Comments may be attached to the timeline or not. A history of all comments is available to view and add to.

To add a comment to the playback bar, play a recording and double click above the central white line and enter a comment. Adding comments where # tags are included will make these # tags searchable. E.g. #SuspiciousTrade or #Complaint. Comments may be added directly to the playback bar at a given point or via the comments view.

Comments may be dragged once added to change their location. Right clicking upon the comment allows deletion.

Comments may also be added from the comments view.
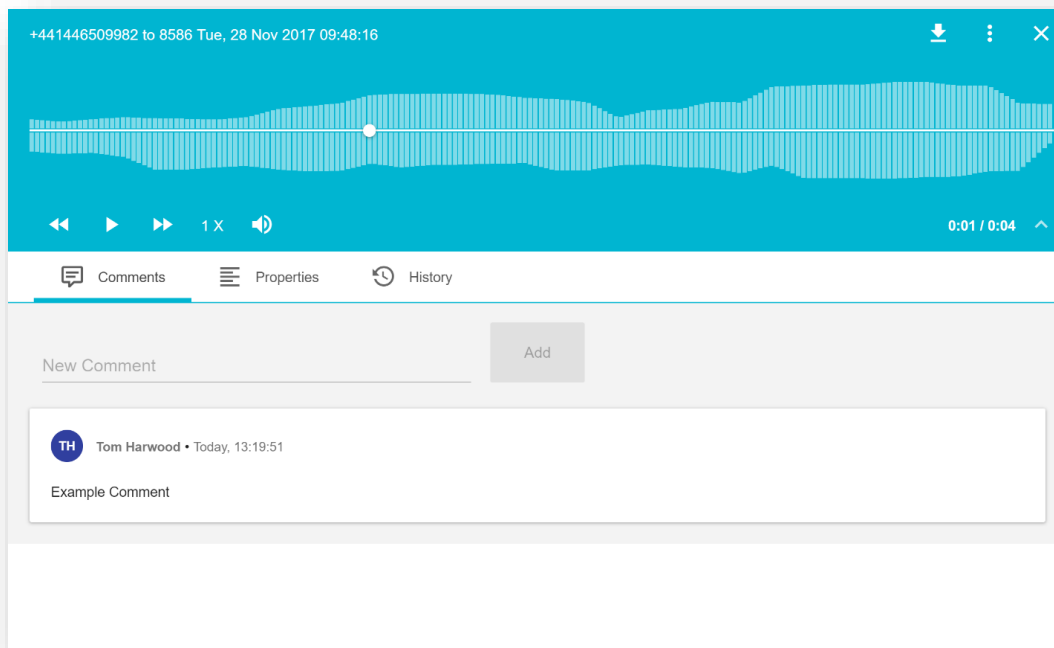
Figure 16 – Comments & Tagging

Deletion policy

Calls cannot be deleted without specific privileges assigned to a user policy. Deletions can be made through the call recording portal, but may have compliance implications.

Should a deletion be made in error, recordings can be retrieved in the following scenarios:

- Up to 11:59 UTC on day of deletion CP/EU can retrieve via portal
- Up to 14 days following deletion, a ticket can be raised into the Gamma support desk to request retrieval. Any request to restore a recording deleted in error will be subject to a one off fee of £250 per request.

Additional Storage

Should more storage be required over the inclusive storage, additional capacity may be consumed. See price list for details.

Minimum User Machine Requirements

The hosted portal is browser based and designed to support all major browsers and operating systems. Each release is tested against the following browsers:

1. Chrome (the current version at the time of version release)
2. Firefox (the current version at the time of version release)
3. IE9, IE10, IE11 and Edge (the current version at the time of version release)

Whilst it is not possible to ensure that breaking changes do not occur as evergreen browsers (Chrome, Firefox and Edge) update, best endeavours are in place to ensure compatibility and swift resolution of any problems.

Please note that the hosted portal is not guaranteed to work on all smartphone/tablet devices and operating systems. On completion of provisioning of the service, the user should perform a pre-test to ensure the service work with their browser/smartphone/tablet device.

Billing

Charging Model

The charging model for Call Recording is based on a monthly charge per user that is inclusive of a defined amount of storage with units expressed in minutes.

If multiple users enabled for call recording were on the same call, the recorded call would be stored multiple times for each user recording the call.

Additional charges apply if the total storage exceeds the sum of the inclusive storage, based on the level of over usage (charged for in bands). See price list for detail.

A Horizon Company can buy multiple Call Recording subscriptions. Each subscription allows the provision of up to one user with the MifID II Call Recording product. For example, 10 MiFID II Call Recording subscriptions allows the provision of up to 10 MiFID II users.

Each call recording subscription contains an amount of inclusive minutes that can be stored free of charge as per the price list. The Company shares the inclusive minutes across all users per call recording product. The amount of inclusive storage is 84,000 minutes per user for MiFID II e.g (10 users = 840,000 minutes available for the identified retention period) Each recorded call is stored in seconds per call to/ from the user. The billable storage is aggregated per user and rounded up to the nearest minute.

For example, if two calls are stored; A: duration 1 min 25 secs and B: duration 4 mins 10 secs, the total stored time would equal 5 mins 35 sec and total aggregate minutes would be 6. When a third call is stored; C: duration 5 mins 15 secs, total stored time would increase to 10 mins 50 sec and total aggregate minutes would be 11.

Actual storage use is a product of the number of minutes recorded and how long call recordings are retained on the system. If the total storage used exceeds the sum of the inclusive storage, then a charge will be raised based on the level of over usage (charged for in bands). See price list for detail.

For comprehensive billing rules see the Billing home page on the Gamma portal.

Call Retention Policy

Each Call Recording product has a standard retention policy. The MiFID II call retention policy is 60 months but can be extended to 84 months - set at a user level, if required. E.g. the call will be stored for 60 or 84 months after the call completed.

Recordings will be automatically deleted in line with the standard retention policy. E.g. automatically deleted after 60 or 84 months. It is possible to manually delete call recordings.

Note: From a data protection point of view retention should be as low as possible so that organisations are not storing customer data unnecessarily. The End User should identify the minimum amount of personal data they need to properly fulfil their purpose. They should hold that much information, but no more. This is part of the practice known as "data minimisation". Source: ICO.org.uk

Support

Service Responsibilities

The Channel Partner will provide all first line support for the Call Recording service. They will support the use of the Horizon GUI and Call Recording portal. Gamma will provide all second line support for these service elements and will provide initial Product training to the Channel Partner after which the Channel Partner is expected to qualify all first line support queries in advance of contacting the Gamma Support team. Gamma reserves the right to charge for or withdraw Product support where unreasonable demands are made outside of second line support obligations and after consultation with the Channel Partner.

Service Alerts

Gamma will issue email and/or SMS service alerts to Channel Partners in the event of any planned or emergency service maintenance. Please note that service alerts will be sent to all Gamma Portal administrator users only and it is the responsibility of the Channel Partner to keep Gamma Portal contact details updated and proactively subscribe additional relevant Gamma Portal users as recipients of service alerts.

System Passwords and PIN Numbers

Channel Partners are responsible for managing End User portal login details.

Where a user has forgotten their password, the user can request it to be reset via the super user. This service will email the user a temporary password which will require the user to immediately replace with a personal one upon use. The temporary password will expire after 24 hours..

It is the responsibility of the Channel Partner/End User to employ any necessary controls regarding the management and maintenance of login credentials and Gamma is unable to accept responsibility for any abuse of the service which may arise as a result of ineffective housekeeping/unauthorised access to the service.

Password policy Rules

- Alphanumeric
- Contain a mix of uppercase and lowercase
- A minimum of 8 characters
- Welcome email will timeout after 24 hours
- Password needs to be reset every 60 days
- There is a strength indicator when setting the password weak->strong

The portal will automatically log out after 30 minutes of inactivity.

Version Control

From time to time it may be necessary to deploy updated versions of the MiFID II Call Recording Product. In the event of significant service updates, Gamma will communicate details to Channel Partners via email and it is the responsibility of the Channel Partner to ensure registered contact details are maintained with Gamma. It is the responsibility of the Channel Partner to communicate any relevant service updates to End Users of the MiFID II Call Recording service.

Legal Responsibilities

There are very strict legal rules governing (a) the circumstances in which it is permissible to record calls, (b) the purposes for which such recording may be made, (c) the length of time recorded material may be retained, (d) most importantly of all, the need for pre notifications to those taking part in the call, and (e) the manner in which such notification must be given.

It is the responsibility of the Channel Partner to ensure that they themselves/End Users of the service are compliant with any legal requirements and it is the duty of the Channel Partner to inform the end user of these considerations in full prior to selling and subsequently ordering the service. Gamma accepts no liability for the misuse of the service.

Regulatory Responsibilities

Channel Partners are responsible for the appropriate allocation of services to End Users. MiFID specific considerations are identified within Horizon Terms & Conditions.

Helpdesk

The Channel Partner will provide all first line support for the MiFID II Call Recording service. All service affecting issues, once delineated and diagnosed by the Partner should be reported to Gamma.

Help Desk Hours and Contacts

Fault support is available 24 x 7 by 365 days a year.

Provisioning support is available 8am to 6pm on a Mon to Fri basis, excluding UK Bank Holidays.

Telephone 0808 178 8000 and chose the Horizon orders option for provisioning and general queries. Alternatively please select the Horizon faults option if there is a problem with the service.

Service Level Agreement

Provisioning

User account creation will take a maximum of 24 hours from point of creation of the "super user".

Availability targets

Service	Measure	Target
Self-service portal	Application Availability	99.99%
Live calls	Availability	99.99%
Reporting	Application Availability	99.99%

Calculation of availability

Gamma shall monitor the availability of the Platform Services.

Availability shall be measured at the gateway between the Platform and the Internet.

Downtime means the total accumulated minutes where the Services are unavailable, measured in one-minute intervals (where a one-minute interval is considered unavailable if all the users' attempts to establish a connection fail throughout the interval).

The monthly uptime percentage for the Platform Services is calculated as follows:

$$\frac{\text{Total minutes in a calendar month - Downtime}}{\text{Total minutes in a calendar month}} = \text{Monthly Uptime Percentage}$$

Subject to specific exclusions to downtime set out below.

Service credits

If Gamma fails to meet the availability targets during a calendar month, then Gamma shall award service credits to the Channel Partner as per the below.

Service credits are calculated by reference to, and awarded against, the total monthly user fees for the affected service.

Service availability	Percentage of total monthly user fees to be awarded as service credit
≥ 99.99%	0
≥ 99.00% < 99.99%	12.50%
≥ 97.00% < 99.00%	25%
≥ 95.00% < 97.00%	37.50%
< 95.00%	50%

Service credits shall be the exclusive remedy for any failure to meet the availability targets.

The Channel Partner must, upon request, supply to Gamma all reasonable information concerning downtime suffered by the Customer including a detailed description of the incident, the duration of the downtime, the server request logs that documented the errors (with confidential information removed), and network trace routes.

Exclusions

The target availability levels do not apply, and service credits shall not be available in respect of:

a. any issues arising out of a Force Majeure Event;

b. Internet access problems or related problems outside the Platform / Internet gateway;

c. any downtime during any period when the Platform Services are being made available on a trial basis or as a pre-release or beta version;

d. any issues resulting from the acts or omissions of the Customer or the Customer's employees, agents, vendors or contractors;

e. any issues resulting from any software or hardware operated by the Customer or any third party (except for third party software or hardware within the direct control of Gamma);

f. any issues resulting from a failure of the Customer to modify its use of the Platform Services as directed by Gamma;

g. downtime outside of agreed hours of operation (standard hours of 08:00 – 20:00 London time); or

h. downtime during scheduled maintenance conforming with the detail provided below.

Scheduled maintenance

Gamma shall give the Channel Partner at least 7 Business Days' written notice of scheduled service-affecting maintenance.

Scheduled service-affecting maintenance shall take place outside of the hours of 07:00 – 23:00 London time, 7 days a week.

Downtime arising out of scheduled service-affecting maintenance shall not constitute downtime for the purposes of any availability calculation under this SLA.

Appendix 1

Below is a list of tested scenarios in regard what does/not get recorded given specific conditions:

Horizon feature	What gets recorded
Auto attendant	• If the call goes from an Auto Attendant to a user with Call Recording the call is recorded. • If the call goes from an Auto Attendant to a user without Call Recording the call is not recorded. • If the Auto Attendant is provisioned with Call Recording, the part of the call in which it is active will be recorded – i.e the announcement and/or hold music. • If a Call Recording user transfers or forwards a call to an Auto Attendant the messaging will be recorded until the Call Recording user is no longer active on the call.
Call barge	• If a user with Call Recording "barges in" on a call, their part of the call will be recorded. • A call already being recorded will include the part of the call with the "barge" in.
Call forwarding	• If a call is forwarded to a user with Call Recording the call is recorded. • If a call is forwarded to a user without Call Recording the call is not recorded.
Call paging	• If a user with Call Recording invokes Call Paging the call will be recorded.
Call Park	• If a user with Call Recording retrieves a parked call the call is recorded. • If a user with Call Recording parks a call and it is retrieved by a user that does not have call recording, the call is not recorded.
Call Pickup	• If the user that picks up a call has Call Recording the call is recorded. • If the user that picks up a call has not got Call Recording the call is not recorded.
Call Queue Group	• If the call goes to a user with Call Recording the call is recorded. • If the call goes to a user without Call Recording the call is not recorded. • If a user with Call Recording transfers a call to a Call Queue Group the time spent in the queue will be recorded until the user is no longer active on the call.
Call Transfer - blind	• If the call is transferred to a user with Call Recording the call is recorded. • If the call is transferred to a user without Call Recording the call is not recorded.
Call Transfer - consultative	• Same as blind transfer, but if the call is being recorded, either for the transferring user or by the destination user, the consultative leg is also recorded.
Click to Dial	• If a user with Call Recording makes a call using click to dial it is recorded.
CLI presentation	• If an incoming call has CLI presentation de-activated, the call is recorded but the CLI is not presented. The third party is shown as "anonymous."
Hold / Music on Hold	• If a recorded call is put on hold with Music on hold, the music is included as part of the recorded. • If there is no music whilst a recorded call is on hold, the "silent" part of the call is not included in playback.
Hot Desk / Hoteling	• If a user with call recording makes a call from a device they have associated themselves with, the call will be recorded. • If a user without call recording makes a call from a device they have associated themselves with the call will not be recorded, irrespective of whether other users with Call Recording have used the same device.
Hunt Groups	• If the call goes from a Hunt Group to a user with Call Recording the call is recorded. • If the call goes from a Hunt Group to a user without Call Recording the call is not recorded.
Instant Conference Groups	• If a call is triggered by a user with Call Recording, a recording of the whole call whilst they are active will be made. • If other users with Call Recording join the conference, recordings will be made per participant for the duration they are active in the conference.

Horizon feature	What gets recorded
Integrator	• If a user with Call Recording makes an outgoing call using Integrator the call is recorded. • If a user with Call Recording receives an incoming call using Integrator the call is recorded.
Receptionist	• If a user with Call Recording makes an outgoing call using Receptionist the call is recorded. • If a user with Call Recording receives an incoming call using Receptionist the call is recorded.
Remote office / Click to Dial	• If a call is made by a user with Call Recording the call will be recorded.
Sequential Ringing	• If a user with Call Recording uses sequential ringing to take a call on a device that is not associated with one of their Horizon numbers the call will not be recorded. • If a user with Call Recording uses sequential ringing to take a call on a device associated with another user that has Call Recording, the call will be recorded, but the user that "owns" the number will be shown as the User in the portal.
Schedules	• If a schedule changes the way a call is routed at certain times, and routes calls away from users who have Call Recording to users or off-net numbers that do not have Call Recording, calls will not be recorded.
Three-way call	• If a Call Recording user is on a call this will be recorded – when a third user joins this leg of the call will be recorded also. • If a Call Recording user joins an existing call, the part of the call they are active on will be recorded.
Twinning	• Incoming calls to a user with Call Recording picked up on a twinned end point will be recorded. • Outgoing calls from an end point twinned with a Horizon user with Call Recording will not be recorded.
Voicemail	• Calls from a Call Recording user to the voicemail portal to retrieve left messages will be recorded. • Call to a user with Call Recording in which a message is deposited will be recorded, including both the message and the voicemail instructions.

Appendix 2 - Supporting Documentation

Document	Location
Battlecards	Accelerate
Billing Spec	Gamma Portal - Billing Home
Datasheet	Accelerate
Demo account (support training)	Web based. URL & access credentials available following Sales Specialist approval
FAQ – MiFID	Academy
Introduction to Advanced Call Recording (video)	Academy
Portal Guide	Call Recording Portal & Academy
Price List – MiFID CR	Gamma Portal - Billing Home
Provisioning Guide	Academy
Service Description	Academy
SLA	Academy within Service Description
Terms & Conditions	Academy - within Horizon Ts & Cs