zoom

Zoom Virtual Agent
Privacy Data Sheet

I.   Introduction

This Privacy Data Sheet describes the processing of personal data, which is information from or about an identified or identifiable person ("Personal Data") by Zoom Video Communications ("Zoom") that is the provider of the Zoom Virtual Agent Service ("**Services**" or "**Virtual Agent**"). Virtual Agent is a conversational chatbot that enterprise customers ("**Customers**", "**you,**" or "**your**") embed in their website or mobile apps for use by their customers ("**End Consumers**"). Specifically, the Services include the following:

- **Zoom Virtual Agent.** The Virtual Agent service is an artificial intelligence-powered conversational chatbot. Virtual Agent engages with End Consumers to automate customer support processes and drive self-service resolution. In cases where Virtual Agent cannot resolve an issue, it can hand off the chat engagement to a support channel or agent. Customers can create multiple chatbots and customize them to handle requests from different audiences, like customers, employees, or partners.

  - **SDK.** Virtual Agent can be integrated into the Customer's existing website and mobile apps using SDKs.

  - **Role Management.** The Customer account holder ("**Account Owner**") can appoint Admins and other users on their account ("**Licensed Users**") to assist in the management of the account.

  - **Flow Design.** The Bot Flow tool allows Admins to visually design the End Consumers' journey during a chatbot interaction. During a Virtual Agent conversation, End Consumers are asked to provide information or make a choice, and the conversation flows to the next step based on their input. Flows are built using a series of interconnected pieces called widgets. Widgets are the building blocks of predetermined conversational structures that perform various functions, like requesting customer information or displaying media.

    Admins can elect to use generative AI to generate a draft bot flow by simply providing contextual description for the flow. Admins can fine tune the draft flow before publication.

  - **Third-Party Integrations.** Virtual Agent integrations connect chatbots to third-party services. For instance, with an integration, user conversations can be handed off directly to a support agent for issues that require human interaction.

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To facilitate the handoff, Admins can set up a pre-chat form to gather critical End Consumer information before initiating the chat with the support agent. Alternatively, an integration can connect a chatbot to third-party services like an e-commerce provider or a customer's data platform to query information necessary to automate self-service resolution.

○ **Artificial Intelligence (AI).** Virtual Agent uses a combination of natural language processing and machine learning techniques to communicate with users in plain language they expect to use in everyday conversations. Virtual Agent utilizes Zoom's AI models with the ability to call upon third-party generative AI models for some features or services. The use of generative AI models is optional and not required for Virtual Agent to function.

When choosing to utilize a third-party model for question answering, the user query and your knowledge article information will be sent to the third party to complete the task. While this data is transferred for the task to be completed, our agreements with providers of the third-party models prevent them from using your data to train their models. However, data may be temporarily retained by those third parties for trust and safety purposes or to comply with legal obligations.

Admins can use voting to "coach" Zoom's AI models to fine tune them to their specific needs and improve the quality of responses provided to the users. These votes are only used to train their own model.

These techniques are used in two key Virtual Agent components:

■ **Intent Management.** An "intent" is a generalized topic that relates to an End Consumer's goal or reason for seeking support from Zoom Virtual Agent. Multiple related intents are grouped together under an intent domain. For instance, intents related to seeking order status or refund information can be grouped under a "customer support" intent domain.

Intent Management utilizes an natural-language understanding (NLU) model to identify the intents of a user to be used by our system to direct users to the correct flow. Customers can use pre-built intents or custom intents in Virtual Agent. Customers can train custom intents on uploaded queries, or they can use third-party models to generate intents based on an intent title and description they enter themselves.

- **Knowledge Management.** A knowledge base is a collection of support articles and other information that Virtual Agent can reference and use to respond to an End Consumer during a conversation. Customers can create or add to an existing knowledge base through a manual CSV file upload, an API connection to supported CRM systems, or by manually creating question-answer pairs using the knowledge base web interface.

  Knowledge Management utilizes an Information Retrieval model and an Answer Extraction model to process End Consumer queries. The Information Retrieval model is responsible for identifying appropriate knowledge base articles to answer the End Consumer's query. The Answer Extraction model extracts a portion of the matched article to respond to a query.

  Zoom does not use any Customer or End Consumers' chats or attachments to train Zoom's or its third-party artificial intelligence models.

- **Bot Responses.** Admins can leverage generative AI to create conversation bot responses. Without generative AI, bot responses that navigate and guide End Consumer interactions can come across as unnatural, repetitive, and lacking contextual awareness.

Virtual Agent software is made available to Customers via servers located in the United States. Account data, settings, chat transcripts, reporting and analytics, and uploaded media assets are stored in the United States. Virtual Agent is only available to enterprise customers.

This Privacy Data Sheet does not apply to any other Zoom products or services. For further detailed information about our Services, please visit the "Solutions" section of our website.

This Privacy Data Sheet expands on our Privacy Statement by describing the Personal Data Zoom processes to provide the Services to our Customers and other data protection matters such as international data transfers and data location. It does not create additional rights or remedies and should not be construed as a binding agreement.

Please get in touch with us at privacy@zoom.us with any questions or comments.

![Zoom](zoom logo)

II. *Data Protection Roles and Processing Purposes*

Zoom is the data processor (as defined in the European Union's General Data Protection Regulation or "GDPR") for all Personal Data processed in delivery of the Services unless explicitly stated as an exception below.

Zoom Customers control the processing of that Personal Data and related Zoom account settings. Zoom Customers can access the Personal Data described below and use it subject to their own policies and procedures.

Why Zoom Processes Personal Data

Zoom processes Personal Data as a processor for the following purposes:

- To provide and update the Zoom Services as licensed, configured, and used by our Customers and their users, including through Customer's use of Zoom settings, administrator controls, or other Service functionality;
- To secure and protect the Zoom Services;
- To resolve issues, bugs, and errors;
- To perform product research and development;
- To provide Customers with support upon request, including applying knowledge gained from individual customer support requests to benefit all Zoom Customers, but only to the extent such knowledge is anonymized; and
- To perform instructions explicitly authorized by the Zoom Customer in a written document.

Zoom processes Personal Data obtained through delivery of the Services as controller (as defined in the GDPR) **only** for the following exhaustive list of purposes:

- To manage Customer business accounts, for example, billing, marketing communication with procurement or sales officials), and related Customer correspondence (e.g., communication about necessary updates);
- To comply with and resolve legal obligations, including responding to Data Subject Requests for Personal Data processed by Zoom as controller (for example, website data), fiscal requirements, agreements and disputes; and
- For abuse detection, prevention and protection (such as automatic scanning for matches with identifiers of known Child Sexual Abuse Material ("CSAM"), virus scanning and

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scanning to detect violations of terms of service (such as copyright infringement, SPAM, and actions not permitted under Zoom's Acceptable Use Policy).

Zoom processes pseudonymised Personal Data or aggregated data as a controller for:

- improving and optimizing the performance and core functionalities of accessibility, privacy, security, and the IT infrastructure efficiency of the Services, including zoom.us, explore.zoom.us, and support.zoom.us;
- internal reporting, financial reporting, revenue planning, capacity planning, and forecast modeling (including product strategy); and
- receiving and using feedback for Zoom's overall service improvement.

Whether acting as a processor or controller, Zoom processes Personal Data only where adequate, relevant, and where such processing is not excessive in relation to the specified purposes.

Sale of Personal Data

Zoom does not "sell" or "share" Personal Data as defined in the California Consumer Privacy Act, as amended by the California Privacy Rights Act ("CCPA"). The "Do Not Sell or Share My Personal Information" link on https://www.zoom.us/ relates to the CCPA. That law defines the words "sale" and "share" very broadly to include allowing the use of third party cookies to be placed on your browser. The "Do Not Sell or Share My Personal Information" setting turns off those third party cookies.

Alternatively, you can click "Cookie Preferences" at the bottom of https://www.zoom.us/ and set the toggle to "Required Cookies." These settings do not affect cookie settings on our Customers' websites where Zoom Virtual Agent is deployed.

III. Personal Data Processed by Zoom

An overview including all details of Personal Data Zoom processes on your behalf when delivering the Services to you is available in our Privacy Statement.

If you use the Services through a Customer account holder (such as your employer or school), that account holder controls the processing of your Personal Data. Your account holder can access the Personal Data described in this document and use it subject to their own privacy statement and policies.

If you have questions about how or why your Personal Data is collected, the legal basis for processing, or requests concerning your Personal Data, please refer to your account holder's privacy statement and policies. Questions and queries should be addressed to your account holder or IT administrator.

Zoom Virtual Agent Services may be connected to a corresponding license to Zoom Contact Center Services which are governed by such Contact Center's privacy notice. Accordingly, if you participate in a Virtual Agent chat by a user from another account, the host's account controls any chat transcripts.

Zoom Virtual Agent groups the Personal Data it processes into the following categories: Customer Content, Diagnostic Data, Account Data (licensed users), Account Holder Data, and Support Data.

Customer Content Data

This is data provided by the Customer through use of the Service including all data the Customer chooses to share during a chat engagement, including chat messaging content, chat participant information, and stored chat message history.

Chat Messages. This will include:
- Chat messages and content between End Consumers and the chat bot.

Chat Participant Information. This will include:
- End Consumer name (if available),
- Time elapsed since the chat started, and
- End Consumer contact details (e.g., name and email addresses) and any other data requested by Customer

Stored Chat Information. This is data at rest (i.e., in storage) and will include:
- Chat messages,
- Chat channel title.

Knowledge Base Content. Knowledge Base Content refers to the collection of information provided by Customers that Virtual Agent can reference and use to respond to an End Consumer during an engagement. Knowledge Base Content also includes tags, categories, and sub-categories assigned by an account administrator to classify Knowledge Base information.

Intents and Intent Domains. Intent refers to the End Consumer's goal when they type in their question or comment. Using intents helps Customers understand the End Consumer's goal at

scale. An Intent Domain is a collection of related Intents. Customers can create and store Intents and associate them with chatbot flows in Zoom Virtual Agent.

Global Variables. Data variables defined by the Customer based on what the Customer would like collected from End Consumers during their engagement with Zoom Virtual Agent. Customers with Zoom Contact Center on the same account are able to sync global variables between Contact Center and Virtual Agent.

Diagnostic Data

Diagnostic Data includes all data automatically generated or collected by Zoom about the use of Zoom Virtual Agent. ***Diagnostic Data does not include a Zoom user's name, email address, or Customer Content Data.*** Diagnostic Data is made up of these categories of data, Chat Metadata, Other Service Generated Data, and Operation Logs.

Chat Metadata

Chat Metadata are metrics about Service usage, including when and how engagements were conducted and quality of service. This category includes:

- System generated identifiers, including an engagement identifier,
- Date and time of chat,
- Duration of chat engagement,
- Operating system and device information, including OS version, connection type (Wi-Fi, etc.), device make and device model,
- IP address (where applicable),
- Language preference from browser cookie, and
- Chat queue information, if any.

Other Service Generated Data

Diagnostic Data that is Other Service Generated Data is information that Zoom uses to provide a service requested by the end-user or Customer. Other Service Generated Data includes a Zoom persistent unique identifier that Zoom's Trust and Safety Team combines with other data elements including IP address, data center, PC name, domain, hard disc ID, network type, operating system type and version, and client version. Zoom uses this data to identify and block bad actors that threaten the security and integrity of Zoom Services. This data is accessible only by Zoom employees with a need to know and subject to appropriate technical and organizational measures.

Operation Logs

Operation Logs are logs allowing account owners and other users with a customized role the ability to view changes made to an account. Any additions, deletions, and updates that may be captured in these logs, in addition to the associated names of users making the changes include:

- The time the action occurred,
- Who did the action,
- Where the action occurred, i.e., the section of the product where the action occurred. For example, this may be one of Intents, Knowledge Management, Integrations, etc., and
- What action they took, e.g., add, edit, or delete.

Account Data (Licensed User)

This is information associated with users who are members of a Zoom Virtual Agent account. Depending on how the account administrator has configured the Zoom Virtual Agent account, this information will include:

- Name,
- Display name,
- Email address,
- Zoom unique Licensed User ID.

Account Holder Business Data
Account Holder Business Data is made up of Billing and Sales Data.

Billing and Sales Data
Zoom Virtual Agent is billed based on a consumption model: customers pay depending upon how many engagements have occurred each month. For each account, Zoom Virtual Agent keeps track of the number of engagements per month to support the billing process.

This is information associated with the individual(s) who are the billing and or sales contact for a Zoom Virtual Agent account. This will include:
- Name,
- Address,
- Phone number,

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- Email address,
- Billing and payment information, and
- Data related to the Customer's account, such as subscription plan and selected controls.

Zoom uses this information for very limited purposes including to:
- Create a Zoom account,
- Provide Zoom services,
- Respond to requests for support,
- Provide announcements related to renewals, software updates, upgrades, and system enhancements, and
- Send marketing communications, where permitted.

Support Data

Support data is information provided by a Customer to Zoom in connection with support activities such as support bot messages, chats, and phone calls (including recordings of those calls) and Service support tickets. The business contacts for a Zoom Virtual Agent account or the account administrators can submit online support requests. The request can include attachments, such as screenshots. Such screenshots may include Customer Content Data or Diagnostic Data.

As controller, Zoom Customers instruct Zoom to process Support Data to provide the requested support, which includes applying knowledge gained from individual customer support requests to benefit all Zoom customers but only to the extent such knowledge is anonymized.

IV.   *Automated Decision Making*

The personal data processed by the Services do not produce decisions that would result in legal or other significant effects impacting the rights of data subjects based solely on automated processing.

V.   *International Data Transfers*

Zoom strives to transfer Personal Data per applicable data protection law. For example, where we transfer Personal Data outside the European Economic Area ("EEA"), Switzerland, or the UK, we do so based on the appropriate EU Standard Contractual Clauses ("SCCs") with additional

safeguards in place, as appropriate, so that the Personal Data is protected to the required standard.

The SCCs, Data Transfer Impact Assessments, and Schrems II

On 16 July 2020, the Court of Justice of the European Union ("CJEU") ruled in the case of the Irish Data Protection Commissioner v. Facebook Ireland and Maximillian Schrems (Case C-311/18) ("Schrems II"). The ruling invalidated the EU-US Privacy Shield Framework as a lawful means to transfer Personal Data from the EEA to the US.

More importantly, however, the CJEU affirmed that the SCCs remain a valid Personal Data transfer mechanism – subject to a new requirement. To rely on the SCCs following Schrems II, data exporters must conduct a Data Transfer Impact Assessment ("DTIA") to assess the risks of individual transfers and adopt any supplementary measures needed to bring the data protection level to the EU standard of essential equivalence.

We've prepared this template Zoom Virtual Agent DTIA to help our Customers perform a risk assessment pursuant to the Schrems II decision. Please note that the DTIA does not form a part of any Zoom contractual document or agreement. It is provided solely as a source of information and reflects Zoom's understanding of complex legal issues. You should make your own determinations and, if necessary, seek independent legal advice.

Zoom also shares Personal Data we collect as a data processor with subprocessors, including members of the Zoom Group. You can find further information about these recipients in Section VIII. Subprocessors in this Privacy Data Sheet.

VI.   *Government Requests to Access Personal Data*

Zoom is committed to protecting our Customers and users' privacy and only produces user data to governments in response to valid and lawful requests, in accordance with our Government Requests Guide and relevant legal policies. Please see this blog post for further information on how we respond to government requests. To access our latest Transparency Report, visit our Trust Center and select the Government Requests Transparency Report icon.

VII. *Data location: Data in Transit & Data Storage*

Data in transit.

Zoom transits customer data through its global network of collocated data centers and public cloud data centers (including Amazon Web Services (AWS) data centers). The Services are designed to work so that any information entering the Zoom ecosystem is routed through the data center nearest the user sending or receiving the data.

Data storage.

Customer Content, Account Data, and Diagnostic Data are stored in the US. At this time, Virtual Agent customers cannot configure data storage in any other country.

VIII. *Subprocessors*

When Zoom hires a supplier to process Personal Data in order to provide some aspect of the Services to you, these suppliers are identified as a "Subprocessor" (in accordance with GDPR terminology), and are disclosed on Zoom's Subprocessor webpage.

Zoom's process for contracting with third-party subprocessors

Zoom requires its Subprocessors to process your Personal Data in accordance with the applicable data protection law and to satisfy equivalent obligations as those required of Zoom as a data processor and outlined in Zoom's Data Processing Agreement ("DPA"), including but not limited to the requirements to:

- process Personal Data following data controller's (i.e., Customer's) documented instructions (as communicated in writing to the relevant Subprocessor by Zoom);
- in connection with the subprocessing activities, use only personnel who are reliable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, under applicable data protection laws;
- promptly inform Zoom about any security breach; and
- cooperate with Zoom to address requests from data controllers, data subjects, or data protection authorities, as applicable.

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Zoom Group Subprocessors

Zoom Video Communications, Inc. owns and controls several global affiliates that form the Zoom Group. All parties of the Zoom Group have entered the appropriate data transfer agreement that sets out the data protection requirements and incorporates the appropriate EU Standard Contractual Clauses ("SCCs"). Zoom's subprocessor page lists the Zoom Group affiliates.

IX. Security (Technical & Organizational Measures): Certifications & Compliance

Zoom implements and uses appropriate technical and organizational measures to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.