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1. Introduction and Objectives

Swiss AI Callcenter processes personal data as part of its software and SaaS services, particularly in the context of AI-supported call handling, conversational AI, and related communication services. This policy definitively establishes:

- Which types of data are stored,
- How long they are retained, and
- Under what conditions they are deleted or anonymized.

It serves to ensure compliance with the requirements of the revised Swiss Data Protection Act (revDSG / nDSG) and, where applicable, the EU General Data Protection Regulation (GDPR). This policy minimizes data protection and liability risks associated with unnecessary data storage and ensures the secure destruction of sensitive data—especially communication content such as call recordings and transcripts. Simultaneously, it protects the rights of data subjects (particularly storage limitation and the right to erasure).

Scope:
This policy applies to all employees of Swiss AI Callcenter and to external service providers who process personal data on our behalf. In particular, IT administrators, data protection officers, and developers are obliged to comply.

Company / Responsible Entity:

Swiss AI Callcenter is a Brand of and represented by
Deep-Impact AG
Rychenbergstrasse 67,
8400 Winterthur
Switzerland

2. Principles of Data Storage

Swiss AI Callcenter stores personal data exclusively for as long as necessary for the respective purpose. We act in accordance with the principles of:

Data Minimization
We collect and store only those data that are absolutely necessary to fulfill the respective purpose.

Purpose Limitation
Personal data are processed exclusively for the previously defined purposes.

Storage Limitation
Data are deleted or anonymized immediately once their processing purpose has been achieved or is no longer relevant.

Security Measures
Through technical and organizational measures (e.g., encryption, access controls), we ensure protection against unauthorized access, loss, or misuse.

These principles arise, among others, from Art. 6 et seq. revDSG and Art. 5 GDPR.

3. Storage Duration and Deletion Periods

The specific storage duration depends on the type of data and the processing purpose. The following tables define our regular periods. Legal retention obligations or official directives may necessitate longer storage; in such cases, however, the data will be blocked and retained only for the legally prescribed purpose.

3.1 Communication Data (Call Handling / Conversational AI)

Call Audio Recordings (if enabled by the Client / configuration)

- **Storage:** Only if call recording is enabled and configured for the respective service and use case.
- **Deletion:** Automated deletion after the configured retention period, unless legal retention obligations or documented Client instructions require a longer period.

Call Transcripts (Speech-to-Text) (if enabled by the Client / configuration)

- **Storage:** Only if transcription is enabled and configured for the respective service and use case.
- **Deletion:** Automated deletion after the configured retention period, unless legal retention obligations or documented Client instructions require a longer period.

Conversation Metadata and Call Events (e.g., timestamps, routing, intent markers, queue events)

- **Storage:** For operational purposes (service provision, troubleshooting, security, quality assurance) to the extent necessary.
- **Deletion:** Regular automated deletion after the defined period expires.

Quality and Service Logs relating to call events (non-content)

- **Storage:** Maximum 6 months for operational review and security-relevant incident analysis.
- **Deletion:** Automated deletion after the period expires.

Note (content vs. metadata):
Where feasible and appropriate, Swiss AI Callcenter separates content data (audio/transcripts) from operational metadata and stores each under distinct access controls and retention rules. Where the Client controls retention (processor scenario), Client instructions prevail within the agreed contractual framework.

3.2 Customer Data

User Accounts and Identification Data (e.g., name, email, user ID)

- **Storage:** As long as the customer actively uses our services.
- **Deletion:** Within 90 days after contract termination (unless legal obligations require longer retention).

Support and Communication History

- **Storage:** Maximum 12 months for tracking support requests and quality control.
- **Deletion:** Automated deletion after the period expires.

3.3 Log Files and System Protocols

System Logs (e.g., login and activity logs)

- **Storage:** Max. 12 months for security analyses and troubleshooting.
- **Deletion:** Automated purging after the period expires.

Audit Logs (e.g., changes in security-relevant systems)

- **Storage:** Up to 24 months, if security-relevant.
- **Deletion:** After the period expires or if no regulatory obligations remain.

3.4 Backups

Database Backups

- **Storage:** Max. 6 months as part of a rolling backup concept.
- **Purging:** Automated deletion or overwriting of older backup versions.

File Backups

- **Storage:** Max. 12 months for restoration purposes (e.g., emergency operation).
- **Deletion:** Automated purging after the defined period expires.

Note: Where necessary, data will be blocked instead of deleted if legal claims need to be secured (e.g., ongoing legal proceedings). Once this retention obligation ceases, definitive deletion will be carried out.

4. Data Deletion Procedures

Swiss AI Callcenter ensures the secure deletion of personal data through defined organizational and technical processes.

4.1 Manual Deletion

- Individual deletion requests (e.g., based on the right to erasure) are executed by authorized administrators.
- Every manual deletion is logged to ensure traceability.

4.2 Automated Deletion

- Regularly established routines remove data that have exceeded the periods defined in Section 3 from the primary systems (e.g., databases).
- For automated processes, it is ensured that deletion scripts are version-controlled and regularly checked.

4.3 Anonymization

- Anonymization is used when immediate deletion is not possible for technical or legal reasons (e.g., ongoing retention period).
- Data are altered in such a way that re-identification is excluded.

4.4 Deletion in Backups

- Deleted data must not remain restorable through regular backups.
- Backup data are definitively removed or overwritten after the periods defined in Section 3.4 expire.
- Where technically not immediately feasible, it is ensured that restoration does not occur during the remaining retention period (e.g., through internal blocking mechanisms).

5. Responsibilities

Data Protection Officer
Monitors compliance with this policy, coordinates deletion requests, and advises on data protection legal matters.

System Administrators
Implement and monitor technical deletion mechanisms, check logs for successful deletion processes.

Departments
Responsible for the correct classification and processing of data (e.g., marking whether data are to be classified as sensitive, content data such as call audio/transcripts, or strictly operational metadata).

Management
Makes necessary resource decisions (personnel, budget) for data protection-compliant implementation.

6. Review and Updates

- This policy is reviewed at least once a year.
- Necessary adjustments (e.g., due to legal changes, new technologies, or changing business processes) are documented and communicated to the relevant employees or departments.
- The current version is provided at a central location (e.g., intranet, shared drive).

7. Final Provisions

- All employees and external partners of Swiss AI Callcenter are obliged to comply with this policy.
- Violations of the policy may result in disciplinary measures or contractual sanctions.
- Requests for deletion or access to personal data, as well as questions regarding implementation, should be directed to the Data Protection Officer.

Contact (to be set by the company):
Email: datenschutzbeauftrager@swiss-ai-cc.com

Last reviewed: January 2026