

Protection of personal data and confidentiality rules of the LINKELLO MEDICAL service

We offer the Linkello service to meet your needs but also because it corresponds to a requirement of confidentiality, security and respect for the personal data that we may collect.

The first principle that we apply to you is transparency. The purpose of this document is to give you all the answers to the questions you may have on these subjects.

1. Our business model is your first guarantee

As a demonstration of the basic functions of Linkello Medical, we offer the Linkello service on the site <https://linkello.com>. This is a service for truly free use. And behind this free, we do not remunerate ourselves by selling the data resulting from your use. We do not collect any personal data other than those necessary to provide you with the service, we do not return any data to actors of online advertising. Obviously, we apply the same rules for Linkello Medical.

Our revenues are exclusively coming from subscriptions to the professional Linkello services Linkello Pro, Linkello medical, API Linkello.

This model guarantees you that we have no motivation to collect data other than that necessary to provide you the expected service and therefore to be on a sound basis for our compliance with the GDPR.

2. What is GDPR ?

The GDPR (General Data Protection Regulation) is an European regulation applicable since May 25, 2018.

The main objective of this regulation is to strengthen, modernize and unify data protection laws for ALL individuals in the European Union.

The GDPR replaced the previous EU privacy directive (95/46 / EC), which has been the basis of European data protection law since 1995.

Motivated from the start by the principle of offering a communications solution ensuring total confidentiality, we are committed to following the recommendations of the GDPR.

All of the company's employees have taken training in order to be made aware of the importance of good management of personal data and to implement solutions in accordance with the GDPR.

2. Our technical solution is our second guarantee

Our technical solution is based on a mesh architecture. This means that video, voice and text data cannot be stored on any server at the end of the communication.

3. Data processed by Linkello Medical

We only collect and process data that is necessary to provide you the best possible service. We give you the details below, explaining the purpose, as well as the retention periods.

3.1 Operational data of the service

Linkello Medical collects no direct personal data and only a few indirect data to provide you the expected service. But without this data, we cannot provide service to you. Details are shown in the table below..

Data collected and stored

Data collected	Purpose	Storing duration
IP Address	<ul style="list-style-type: none">- For the purposes of statistics on the use of the service (through the Matomo tool)- Log files in a service activity log intended for internal technical teams in the event of operating problems and / or correction of malfunction	12 mois glissants Duration of 2 years in accordance with the law
Name of the room	Identify the conference room for different users	Duration of validity of the link (24h)
Pseudo or Name (Name entered by user)	Display the name indicated by the person connecting to the conference room	Duration of validity of the link (24h)

Données collectées et conservées for account management

Data collected	Purpose	Storing duration
Email address	<ul style="list-style-type: none">- Account ID- Email address allowing communication on the Linkello Medical service	1 year after the end of the subscription for reasons of commercial contact only on the condition that the person has not withdrawn their consent

Last Name	Display during video call	1 year after the end of the subscription for reasons of commercial contact only on the condition that the person has not withdrawn their consent
First Name	Display during video call	1 year after the end of the subscription for reasons of commercial contact only on the condition that the person has not withdrawn their consent
Billing address	Legal obligation for invoicing	1 year after the end of the subscription

3.2 Service usage analysis data

These data have 2 purposes:

- on the one hand for technical purposes: by allowing us to monitor traffic trends and detect upstream uses that will require changes to our platforms and maintain quality of service.
- on the other hand, for marketing purposes to follow the evolution of the use of the service and identify ways to improve our offer.

This data is collected through the Matomo tool, an audience monitoring tool (previously called Piwik). This Open Source product is the only solution that is recommended by the CNIL as part of its GDPR recommendations as an audience measurement tool and therefore consent is exempt. Full details of Matomo's compliance here. This tool is installed on our platforms in France in a configuration ensuring the anonymization of data

3.2 Data collected by third parties

Third party for support

When you make a request through the Contact page of the site, you are explicitly asked for your email address, which is essential to be able to answer you.

To manage these requests, we use a third-party service that follows the recommendations of the GDPR (<https://www.uservoice.com/privacy#UserVoice-s-commitment-to-comply-with-US-EU-and-Swiss-US-Privacy-Shield-Principles>)

Third party for the subscription to the Linkello Medical service and for the billing and payment module of your online services

When registering for the Linkello Medical service, we use a third-party service which is in charge of all subscriptions, billing and payment aspects. To provide these services, this third party needs a certain amount of data:

- on enterprise
- on management
- on payment methods

This company is also the one that allows you to bill and get paid for your online services.

We made sure before retaining that this third party was in compliance with the GDPR. (<https://stripe.com/fr/guides/general-data-protection-regulation#stripe-et-le-rgpd>)

4. Data recipients

All the data collected by the Linkello service is intended exclusively for our technical service, and also for our marketing and / or sales service.

5. Location and hosting of collected data

The data of Linkello service collected is hosted by the following service providers:

- Scaleway (Iliad) - France - as host of the signaling platform (audio / video calls) and for audience measurement data
- Coreye - France hoster HADS for service operating data (log files)

The data kept by third parties is stored on their own servers.

6. Security of processing t

Security is a major concern of the Linkello Medical service.

All communications to our services as well as those of our partners are encrypted via an SSL certificate (HTTPS)

We implement reasonable technical and organizational measures to best protect the data collected or entrusted within our organisation. Most of this data is anonymous.

However, no data storage or transmission system can be guaranteed to be 100% secure. If you have reason to believe that there is a doubt about the confidentiality of our exchanges, please contact us at contact@bistri.com

7. Cookies - EPrivacy

We only use cookies that are strictly necessary (session, preferences, etc.) to ensure the proper functioning of the service in accordance with the rules of EPrivacy and the

recommendations of the CNIL. Also we do not need to obtain the consent of the user of the service.

8. Authorities' requests

Linkello Medical may be called upon to provide data to the police and justice authorities within a strict legal framework with the agreement of a magistrate.

9. Access rights

Any request relating to your personal data must be sent by post to our Personal Data Protection Officer at the following address :

BISTR

66, Avenue des Champs Elysées

75008 PARIS

contact@bistri.com

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