

TIXEO GDPR GUIDE

The protection of your personal data is at the heart of our commitments



www.tixeo.com

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Foreword

Meeting by video conference has never been easier, but at what cost?

Organisations are adapting to the new hybrid working methods by equipping themselves with video-collaboration tools.

By deploying them, they share a multitude of data on their activity, and often, without any guarantee of their protection. However, the cybersecurity risks are there and represent a danger for any organisation, both financially and in terms of their reputation.

The explosion of video conferencing should lead organisations to choose secure, European solutions. For nearly 20 years, TIXEO has been working to ensure that secure remote collaboration is possible everywhere and that shared personal data is protected.

Today, more than 300 organisations in sensitive and strategic sectors have chosen TIXEO for secure remote collaboration.

Working closely with our customers, from whom they draw their capacity for innovation, the TIXEO teams are guided by one desire: to increase the performance of videoconferencing tenfold while guaranteeing maximum data security.

The explosion of videoconferencing should lead organisations to choose secure, European solutions.



TIXEO, the European leader in secure videoconferencing, was created in Montpellier in 2003. Today, it is the one and only videoconferencing technology certified and gualified by the ANSSI (French National Agency for Information Systems Security).



Learn more



1. Full transparency on the use of your personal data

As a French and European company, TIXEO is compliant with the GDPR (General Data Protection Regulation).

Like many, we could have stopped there with the explanations.

However, we want to offer you the utmost **transparency** regarding the use of your personal data in the context of our services.

In this guide you will find all the essential information you need to know about:

- · The treatment
- The use
- The accommodation
- The conservation
- And the protection of your personal data

We want to offer you the greatest transparency regarding the use of your personal data in connection with our services.



We know the extent to which data processing great deal of attention must be paid to the vigilance. That is why we are committed to ensuring the security of the personal data of our users, customers and visitors to our website, by taking all technical and organisational measures to protect it from unauthorised access, use or disclosure and from loss, destruction or alteration. »

Renaud Ghia, Chairman and co-founder of TIXEO

To find out how your personal data is used easily



Select now your user profile



2. Choose a European videoconference

Today, most of the major video conferencing publishers are not European and offer their solutions in non-sovereign clouds outside the European Union.

Extra-European videoconferencing: opening up the data

By choosing a non-European videoconference, the personal data of users, whether foreign or European, may be exploited by a third party entity or organisation.

Indeed, most non-European video conferencing solutions are subject to flexible data protection regulations.

In the United States:

- The Foreign Intelligence Surveillance Act (FISA) (50 USC § 1881, Section 702) requires cloud hosts located in the United States to provide their data and encryption keys so that the authorities can decrypt the exchanges if necessary.
- The Cloud Act, a set of extraterritorial laws, allows authorities to compel publishers located in the US to provide electronic communications data stored on US or foreign servers.

In other countries, similar regulations are in place.

• European videoconferencing: data protection

By choosing a European videoconference, users' personal data are strictly protected by the GDPR.

European video conferencing editors are only subject to the GDPR, which is much more demanding in terms of personal data protection. It provides a firm framework for the processing of personal data, requiring editors to clearly define their purposes. GDPR also excludes any possibility of transferring data to a third country, without prior contractual agreement.

Since 16 July 2020, the Privacy Shield, which allowed the legal transfer of personal data between the European Union and the United States, has been invalidated by the Court of Justice of the European Union. These transfers were deemed to be insufficiently regulated: the GDPR calls for more precautions on the part of publishers.

TIXEO has a legal and moral obligation to comply with the RGPD in order to ensure that its users' data is protected.



Most non-European video conferencing solutions are subject to flexible data protection regulations.





TIXEO is recommended by the CNIL to protect users' privacy



In 2020, in its advice for using videoconferencing tools, published on its website, the French Commission for Data Protection and Liberties (CNIL) recommended using TIXEO in order to protect the privacy of users.

Discover the advice of the CNIL

Strengthening the sovereignty of organisations

The GDPR compliance of TIXEO's solutions is consistent with the high level of security of its solution.

TIXEO's videoconferencing solutions are **Secure by design**: data security is taken into account from their conception to their deployment.

The sensitive nature of our customers' data, evolving in the defence, health and industrial sectors, requires the utmost vigilance in the protection and management of their personal data. TIXEO is well aware of this strategic issue and wishes to guarantee independence and sovereignty for their video-collaboration tools.

TIXEO is well aware of this strategic challenge and wishes to guarantee independence and sovereignty for their their video collaboration tools.

Definition

Secure by design consists of designing software or an application by addressing security concepts from the very first stages of design.

How does it work?

When designing our videoconferencing solution, the TIXEO teams determine the interactions that will take place between users and possibly with other services. They are thus able to quickly identify potential points of failure.

Faced with these points of failure, the teams work out the solutions that will have to be integrated during the development phases of the solution.



3. Important clarification on the type of data collected

In accordance with the GDPR, TIXEO does not collect any data considered sensitive such as:

- · Alleged racial or ethnic origin
- Political views
- · Religious or philosophical beliefs
- · The trade union membership of individuals
- · Genetic and biometric data
- · Data concerning the health, sex life or sexual orientation of individuals
- · Data relating to criminal convictions or offences
- The unique national identification number (NIR or social security number)

Is TIXEO responsible for personal data or a data processor?

Depending on the use of its services, TIXEO is responsible for processing personal data or is a processor on behalf of its Cloud customers.

Definition

The responsible of the processing is the one who determines the purposes and means of a processing. TixeoServer customers are responsible for the processing of their users' personal data.

TIXEO does not collect any data deemed sensitive.







/ TIXEO acts as a personal data processor:

- When a TixeoPrivateCloud or TixeoCloud customer processes the personal data of
 its users (participants, meeting organizers, administrators) in the context of the use
 of the service and in particular in the context of the recording of a videoconference
 involving the collection and processing of audio and video data.
- In rarer cases, when a Tixeo Server user creates a guest list for the videoconference, it is stored in a database so that it can be consulted in case of remote technical support by TIXEO.

/ TIXEO acts as a personal data processing responsible:

- When a user invited by a TIXEO customer creates an account.
- When a guest or non-guest user contacts Tixeo technical support.

OVH, sovereign cloud host for TIXEO



OVH, a European leader in the cloud, takes every precaution to preserve the security and privacy of personal data processed. TIXEO trusts them to host its users' data in Europe.

Learn more about OVH's commitments





4. Learn more about Tixeo's processing of your personal data

You are...

Tixeo customer

Invited to a Tixeo videoconference

Registered for a demo

Registered for our free trial

In contact with Tixeo's services

Visitor to our website

Interested in our white paper

TIXEO processes your data:

- During your videoconference meetings:
- To generate a history of meetings required by clients (administrators)
- To enable you to find the people who attended a meeting
 - > These two purposes are foreseen in the execution of the contract
- As part of the management of your subscription:
- To create and connect to your TIXEO account and have secure access to the chosen software solution (including authentication to services)
- To respond to your requests for assistance
 - > These two purposes are foreseen in the execution of the contract
- To generate statistics which are then made available to the customer via his administrator account
- · To provide us with information necessary for maintenance operations, including monitoring our data centres and networks > in the legitimate interest of TIXEO to establish statistics and ensure the security of the software solutions offered

Data processed (depending on the request) at any meeting:

- · Last name
- First name
- · E-mail address
- Login
- Password
- Date of the meeting
- Time of the meeting (start)

- · Duration of the meeting
- Title of the meeting
- · List of participants
- Meeting server address
- · Log of your connections and disconnections (including IP addresses)

□ Duration of data retention:

You choose the period of retention. In all cases, the data will be deleted at the end of the subscription.



Tixeo customer **Invited to a Tixeo** videoconference

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TIXEO processes your data in order to:

· Allow the creation of an online account for secure access to any videoconference

✓ Good to know:

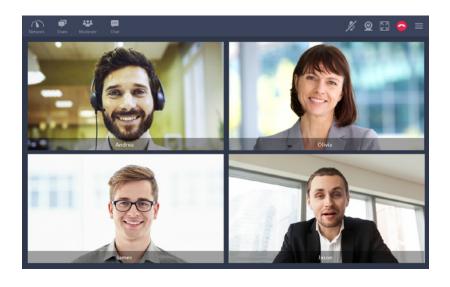
No guest data is processed by TIXEO as responsible of the processing, except for necessary to create an account for security purposes.

Data processed (depending on the request) at any meeting:

- Last name
- First name
- E-mail address
- Login
- Password

Duration of data retention:

1 year maximum from the last contact (unless opposed).





Tixeo customer Invited to a Tixeo videoconference Registered for a demo

Registered for our free trial

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TIXEO processes your data:

- To provide a demo of the software solutions to any person who requests it (execution of pre-contractual measures)
- To carry out commercial prospecting operations and demo request statistics

> In the legitimate interest of TIXEO to offer its products and services to professional customers and to establish statistics

In the event of a specific technical request, to provide an adapted response by a specific subcontractor or integrator certified by TIXEO

> It is in TIXEO's interest to be able to respond to specific technical requests

Data processed (depending on the request):

- Last name
- First name
- E-mail address
- Business telephone number
- Name of the company represented

□ Duration of data retention:

Maximum 3 years after the last contact (unless opposed).





Tixeo customer

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TIXEO processes your data:

- To create and connect to your TIXEO account and have secure access to the chosen software solution (including by authentication to services) (execution of pre-contractual measures)
- To respond to your requests for assistance
- To provide us with information necessary for maintenance operations to ensure data security, including monitoring our data centres and networks
 - > in the legitimate interest of TIXEO to respond to your requests and to ensure a high level of security of the software solutions
- · To carry out commercial prospecting operations
 - > in the legitimate interest of TIXEO to offer its products and services to professional customers
- In case of specific request, to allow an optimal technical deployment of TIXEO solutions by a specific subcontractor or integrator certified by TIXEO, either remotely or on site
 - > in the legitimate interest of TIXEO to technically deploy the solution in all possible technical cases by a subcontractor at a distance or on the customer's site

Data processed (depending on the request):

- · Last name
- First name
- E-mail address
- Identifier
- Password
- Business telephone number
- · Name of the company represented

☐ Duration of data retention:

Maximum 3 years after the last contact (unless opposed).



Tixeo customer Invited to a Tixeo videoconference Registered for a demo

Registered for our free trial

In contact with Tixeo's services

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Interested in our white paper



TIXEO processes your data:

When you contact us via our contact form:

- To respond to any contact request made by an Internet user
- To carry out commercial prospecting operations

> in the legitimate interest of TIXEO to respond to any request made by an Internet user and to offer its products and services to professional customers

When you ask for technical support:

To provide you with an adapted response by a specific subcontractor or integrator certified by TIXEO

> in the legitimate interest of TIXEO to be able to respond to specific technical requests

Data processed (depending on the request):

When you contact us via our contact form:

- Last Name
- First name
- E-mail address
- Business telephone number
- Name of the company represented
- Question asked

Lorsque vous demandez un support technique :

- Last Name
- First name
- E-mail address
- Login
- Operating system
- Time-stamped lines
- Date of download of the TIXEO solution on the computer or via Google Store or Apple Store
- Messages exchanged

Duration of data retention:

For the contact form:

Maximum 3 years from the last contact

For technical support contact:

For the duration of the subscription, then 5 years in the «archive» for evidence purposes



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TIXEO processes your data:

To obtain audience statistics for the www.tixeo.com website.

> in the legitimate interest of TIXEO we use the free software Matomo to establish audience statistics of our website.

✓ Good to know

Why don't you have to consent to cookies on tixeo.com?

The free Matomo software anonymizes your visits to our site: in other words, your IP address is always truncated before being recorded by the audience statistics. We respect your privacy and are not obliged to ask for your permission to collect this data.

Learn more about Matomo's terms of us

https://fr.matomo.org/privacy/

Data processed (depending on the request):

- Geographical data
- Number of visitors
- Time spent
- Page views
- Outgoing links
- Type of devices (computer, tablet, phone) & OS

☒ Duration of data retention:

- 13 months maximum for the cookie
- 25 months maximum for data generated



Tixeo customer

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Visitor to our website

Interested in our white paper

TIXEO processes your data:

- · To send the White Paper to anyone who requests it
- · To carry out commercial prospecting operations

> It is in the legitimate interest of TIXEO to send the White Paper to the person who requests it and to offer its products to professional customers with a request for consent for private individuals.

· For statistics on requests to download the White Paper

> in the legitimate interest of TIXEO to measure the relevance of updating the White

Data processed (depending on the request):

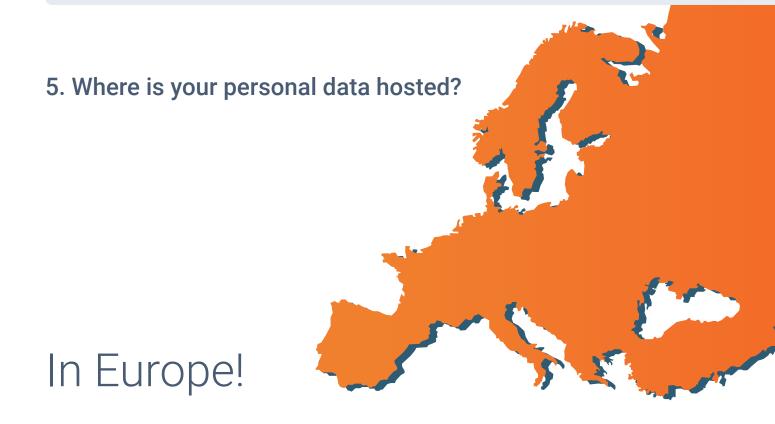
- Last Name
- First name
- · E-mail address
- · Business telephone number
- · Name of the company represented
- Preferred dates and times
- How the person got to know TIXEO

Duration of data retention:

Maximum 3 years after the last contact (unless opposed)







TIXEO has opted for a multi-cloud strategy: the hosting of our services is distributed in mainland France (Strasbourg, Gravelines and Roubaix) in order to guarantee a high availability of service to our customers.

The personal data that we collect and process in the context of providing our services to our users are hosted by the company OVH, whose servers (datacenters) are located in mainland France.

Users' personal data is never transferred to a third country, except Switzerland. The country benefits from an adequacy decision. Data may therefore be transferred to our partner Ubcom in Switzerland, only with the explicit consent of the person concerned.

OVH is committed to complying with the obligations of the GDPR. Thanks to this commitment to compliance, OVH's customers, including TIXEO, are also able to meet some of their regulatory obligations.

For more information on OVH's protection of personal data:

OVH security measures for the protection of personal data



6. How do we ensure the protection of your personal data?

TIXEO implements numerous internal security measures to ensure the protection of its users' personal data.

The following is an overview of the main measures implemented:

- Daily backup of databases
- Deployment of software protection measures, including regular updates
- Encryption of the hard disks of staff workstations handling personal data
- Verification of the compliance of subcontractors with Article 28 of the GDPR

> For obvious safety reasons, these devices cannot be detailed further in this guide.

The TIXEO teams are constantly on the lookout to adapt these measures to the regulations in force and guarantee maximum data protection at all times. This includes the control of infrastructures but also compliance with the GDPR of its ecosystem.

Thanks to these precautions, TIXEO is committed to securing the personal data that it processes or subcontracts.

In addition, it is important that users are also aware of the protection of their personal data.

The TIXEO teams are constantly on the lookout to adapt their security measures to the regulations in force and to guarantee maximum data protection at all times.





7. Who are the potential recipients?

In addition to TIXEO's internal departments, which are the main recipients of the data, third parties may have access to personal data and only in certain cases and after having been authorised.

These cases can be:

- · A requisition provided for by law,
- · A court order,
- Or a decision by a competent public authority and for the purpose of maintaining of order.

The following is a list of third parties with whom we may share personal data:

- Third parties to establish, enforce or defend the rights of TIXEO SAS
- Third parties in the event of a merger, sale, joint venture, assignment, transfer or other disposal of all or part of the assets of TIXEO SAS (including and without restriction in the context of bankruptcy or similar proceedings)
- Integrators or subcontractors certified by TIXEO, within the framework of a technical request or in order to ensure an optimal deployment of the partner service, which are the following:
 - . Bardinet Télécom
 - . MindTechnologies
 - . Ubcom
 - . Connect4Video

«When we pass on your personal data to a third party, we take all reasonable steps to ensure that such third parties are bound by confidentiality obligations».



Each TIXEO service has access only to the personal data necessary for its tasks.

For example:

- Technical Support only has access to personal data necessary for the maintenance of software solutions and data security
- The Commercial Department only has access to the identification data necessary to carry out commercial prospecting operations, in compliance with the applicable data protection provisions.





8. Your access and control over your data

The GDPR guarantees specific rights with regard to information and its use. **TIXEO declares** that it collects information in the regular course of business to enable the processing and execution of orders or contracts, in order to deliver its products and services.

In accordance with your rights under the GDPR and subject to proof of the legal requirements, you can:

- Request access to your personal information and data (you can also request a copy of this personal data)
- · Request to update and amend your personal data to ensure accuracy
- · Requesting the deletion or removal of your information and personal data
- · Oppose the processing of your information and personal data
- · Requesting the restriction of the processing of your information and personal data
- Request the transfer of your information and personal data to you or to another controller of the data you have provided where the processing is based on your consent or the performance of the contract
- Oppose profiling or automated decisions that may have an impact on you (TIXEO does not make any automated invidual decisions)
- Define guidelines for what happens to your data after your death.

For more information, you can also consult the CNIL website:

https://www.cnil.fr/fr/les-droits-pour-maitriser-vos-donnees-personnelles

Finally:

- You have the right to lodge a complaint about TIXEO's practices in relation to your personal data with the supervisory authority in your country (in France, the CNIL) or in an EU Member State.
- We may not be able to respond favourably to any of these requests in the following cases:
 - . Inability to prove your identity
 - . If this prevents us from meeting our regulatory obligations
 - . If this involves excessive costs or effort.



9. Would you like to know more?

See our privacy policy:

https://www.tixeo.com/en/secure-video-conferencing/privacy-policy/

Contact us:

Our teams

contact@tixeo.com

Our technical support

support@tixeo.com

Contact our Data Protection Officer





TIXEO commissioned

the lawyer Apolline SCHMITT, Lawyer at Barreau de STRASBOURG, practising at 52 Avenue des Vosges 67000 STRASBOURG

> to guarantee the protection of Tixeo's personal data.

> > dpo@tixeo.com

Try TIXEO free for 30 days











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