

## Privacy Policy

## PRIVACY POLICY

At IST, we value your personal information because if you entrust it to us, we must take great care of it and, above all, explain to you in a transparent manner how we collect and use it.

The purpose of this Privacy Policy is to:

- Clearly and simply explain to You why and how We use the information We collect when You use our services;
- Detail the options We offer You to control the use of Your data, the rights You have over it and how to exercise them.

### WHO IS DATA CONTROLLER?

This Privacy Policy is addressed to You, in Your capacity as an Internet user who accesses the INVIVOX platform via the website <https://invivox.com/> and is intended to inform You of the way Your personal data may be collected and processed by IST.

#### What is "personal data"?

"Personal data" is any information about You that allows for Your identification, directly or indirectly. For example, your first and last name or a photo may allow for Your direct identification. Your RPPS/ADELI number allows to identify You indirectly, because there is a table of correspondence between your number and your name. It is therefore personal data.

#### What is a "processing" activity?

The word "processing" refers to any operation, or set of operations, involving personal data, regardless of the process used (collection, recording, organization, storage, adaptation, modification, consultation, use, communication by transmission, dissemination or any other form of provision, reconciliation or interconnection, blocking, deletion or destruction, etc.)

IST undertakes to commit the following two (2) essential principles:

- You remain in control of your personal data;
- Your data is processed in a transparent, confidential and secure manner.

More formally, this means that we commit to comply with both the French Data Protection Act (Act n°78-17 of January 6, 1978 (known as "**Loi Informatique et Libertés**"), in its version applicable on the day of consultation of the Privacy Policy, and the European Data Protection Regulation (Regulation 2016/679 of April 27, 2016 known as "**GDPR**").

## Privacy Policy

[Learn more about us and our contact information](#)

### Legal reminder:

The **data controller** is, according to the French Data Protection Act, the person who determines the means and purposes of the processing. When two or more data controllers jointly determine the purposes and means of the processing, they are the **joint data controllers**.

The **data processor** is a person processing personal data on behalf of the data controller, acting under the authority of and on the instructions of said data controller.

Depending on what is indicated within the details of the purposes, the data controller may be:

- The company In Situ Training (IST), a French “société anonyme” with a capital of 288.014 Euros, registered Bordeaux under number 813 123 486, having its headquarters located 21, rue Eugène et Marc Dulout – 33 600 PESSAC FRANCE;
- The Provider through which you Book a Training Course or access Content. In this case, IST is the Provider’s data processor.
- The Payment Services Provider through which you purchase a Training Course or Content In this case, IST is the Payment Services Provider’s data processor.

For any question relating to the management and use made of your personal data, You may contact IST:

- By the chat tool on the [invivox.com](https://invivox.com) Platform;
- By email at : [dpo@invivox.com](mailto:dpo@invivox.com);
- By mail to In Situ Training 21, rue Eugène et Marc Dulout – 33 600 PESSAC FRANCE

---

Some words are capitalized because they have a particular meaning. If you wish to know their precise meaning, you can consult their definition below:

### Definition:

"**Beneficiary**" means any Healthcare Professional and any person with a direct or indirect link to the healthcare industry, who logs into his or her Account using his or her Credentials and who accesses Content offered by the Provider via the Platform.

"**Account**" means the interface hosted on the Platform in which all the data provided by the Beneficiary or the Provider User is grouped. Access to the Account is made through the Credentials.

"**Content**" means the Training Courses, smart learning materials created such as clinical cases, replays and, in general, any content that the Provider offers to Beneficiaries, free or not.



## Privacy Policy

"**Terms of Use**" means this document which describes the general conditions applicable to the use of the Platform by Users.

"**Content Provision Terms**" means the contractual conditions governing Access to Content by the Beneficiary alongside the Provider.

"**Training Courses**" means all face-to-face or remote medical trainings offered by Providers to Beneficiaries via the Platform.

"**Identifiers**" means the email and password of the Platform's User, allowing access to the Account on the Platform. Those Identifiers are for the User's exclusive use and are under his/her sole responsibility.

"**IST**", "**Us**" or "**Our**" means the Platform's operator, which is company In Situ Training (IST), a French "société anonyme" with a capital of 288.014 Euros, registered Bordeaux under number 813 123 486, having its headquarters located 21, rue Eugène et Marc Dulout – 33 600 PESSAC FRANCE;

"**Travel Partner**" means any IST partner who offers to organize all or part of a Beneficiary's travel in order to attend a Training Course.

"**Platform**" means the online platform accessible at <https://invivox.com>, published and operated by IST. The Platform includes all the web pages, Services and functionalities offered to Users.

"**Provider**" means any natural or legal person listed on the Platform which offers, in the context of his professional activity, Content to of Beneficiaries as well as, as the case may be, Provider Users who access the Platform.

"**Payment Services Provider**" means the company with a banking license providing, through IST, payment services to Providers in order to enable them to collect the Content price from the Beneficiaries.

"**Services**" means all the services proposed by IST to Users via the Platform.

"**Healthcare Professional**" means any person practicing a profession listed in the International Standard Classification of Occupations (ISCO) (ILO 2008; WHO 2010), complying with the legal conditions of practice as defined by the relevant regulations and registered as such with the relevant bodies. Health Professionals also include interns and medical residents who can provide a certificate of schooling.

"**Publication**" means the provision of a Content to the public through the Platform.

"**Booking**" or "**Book**" means the act of booking Content carried out by the Beneficiary with the Provider via the Platform.

"**User**", "**You**" or "**Your**" means any person who accesses the Platform, whether a Beneficiary, Provider User or mere Internet user.

## Privacy Policy

“**Provider User**” means any person at or on behalf of Provider, and under the sole responsibility of Provider, accessing Provider's Account through the Identifiers provided by IST.

### HOW DO WE COLLECT YOUR DATA?

All of the personal data concerning You is collected directly from You, either when You subscribe to IST's Services, or during exchanges with our services (online requests, letters, telephone calls, etc.).

In addition, data relating to Your navigation on the Platform may be used to target Your needs and interests and to target Our commercial and advertising offers accordingly.

### WHY AND ON WHICH LEGAL BASIS DOES IST PROCESS YOUR DATA?

Your personal data may be collected and processed for different purposes, depending on the Services You benefit from and for different purposes.

The purposes for which your personal data is processed by IST, its service providers or Providers are:

- Creating Your Account and accessing the Platform's features;
- Create Content;
- Book and manage access to Content;
- Proceed with payment for paid Content;
- Answer and manage your questions;
- Send You evaluations and surveys;
- Communicate with You about the Platform and its Contents;
- Communicate with You about a Provider's Content or similar products or services;
- Ask You for, collect and process Your opinions and comments about a Content;
- Respond to and manage your requests to exercise your data protection rights;
- Detect and prevent fraud;
- Comply with a legal request;
- Make the Platform and its functionalities available and ensure its proper functioning and continuous improvement.

The purpose detail is the following:



## Privacy Policy

<i>Purpose</i>	<i>Personal data categories</i>	<i>Data subjects</i>	<i>Legal basis</i>	<i>Data controller identity</i>	<i>Recipients</i>	<i>Storage duration</i>
<b>Creating Your Account and accessing the Platform's features</b>	<ul style="list-style-type: none"> <li>▪ Identification and contact data (Name, email, etc.);</li> <li>▪ Professional data (Place of work, specialty, person's interests in terms of specialty / procedures, etc.)</li> </ul>	Beneficiary	Performance of the Terms of Use	IST	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>▪ IST's technical staff, in charge of managing the Accounts;</li> <li>▪ Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	For the duration of the relationship and for 3 years from the last connection of the Beneficiary on the Platform or from the deletion of the Account.
<b>Create Content</b>	<ul style="list-style-type: none"> <li>▪ Identification and contact data of the individual appearing within Content and of Provider Users administrating the Provider's Account</li> </ul>	Individual appearing within Content and of Provider Users administrating the Provider Account	Legitimate interest of the Provider to process the data of the individuals appearing within Content	Provider	<p>The Provider creating the Content.</p> <p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>▪ IST's technical staff, in charge of managing the INVIVOXConnect Software;</li> </ul>	Duration of Content Publication on the Platform



## Privacy Policy

			Performance of contractual measures concerning Provider Users administering the Provider's Account		<ul style="list-style-type: none"> <li>Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	
<b>Book and manage access to Content</b>	<ul style="list-style-type: none"> <li>Identification and contact data (Name, email, etc.);</li> <li>Professional data (Place of work, specialty, etc.)</li> <li>Content-related data.</li> </ul>	Beneficiary	<ul style="list-style-type: none"> <li>Performance of the Content Provision Terms;</li> <li>Our legitimate interest in offering You to finalize Booking on the Platform.</li> </ul>	<p>Provider</p> <p>IST acts as data processor pursuant to the Providers instructions as determined within an agreement</p>	<p>The Provider with which the Beneficiary books Content is the recipient of the personal data.</p> <p>In the context of the preparation and execution of Content by a Provider, the Beneficiary is invited to contact the Provider in order to obtain information relating to the possible processing(s) that it implements in its capacity as data controller and for which IST is not involved.</p>	<p>For the duration of the relationship and for 3 years from the last connection of the Beneficiary on the Platform or from the deletion of the Account.</p>
<b>Proceed with payment for paid Content</b>	<ul style="list-style-type: none"> <li>Payment means-related data (identity, 4 last</li> </ul>	Beneficiary	Performance of the Content Provision Terms	Payment Services provider	<b>Within the limits of their respective responsibilities, may have access to personal data:</b>	For the duration of the relationship and for 3 years from the last connection of



## Privacy Policy

	<p>digits, expiry date, etc.);</p> <ul style="list-style-type: none"> <li>IST cannot access all payment means-related data</li> <li>Beneficiary identification data</li> </ul>			<p>IST acts as data processor pursuant to the Providers instructions as determined within an agreement</p>	<ul style="list-style-type: none"> <li><b>IST's technical staff, in charge of managing payments;</b></li> <li><b>The Payment Service Provider.</b></li> </ul>	<p>the Beneficiary on the Platform or from the deletion of the Account.</p>
<p><b>Answer and manage your questions</b></p>	<ul style="list-style-type: none"> <li>Any personal data You communicate do Us in that regard (ex: name, surname, email, etc.)</li> </ul>	<p>User</p>	<ul style="list-style-type: none"> <li>Consent;</li> <li>Take steps at the request of the User prior to entering into a contract</li> </ul>	<p>IST</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's technical staff, in charge of customer relationship;</li> <li>Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	<p>For the duration of the discussions and for 3 years from the last contact of the User or the User's request to delete personal data made to IST.</p>
<p><b>Send You evaluations and surveys</b></p>	<ul style="list-style-type: none"> <li>Identification and contact data (Name, email, etc.);</li> <li>Evaluation and surveys content.</li> </ul>	<p>Users</p>	<p>IST's legitimate interest in evaluating Content listed on the Platform</p>	<p>IST</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p>	<p>For the duration of the discussions and for 3 years from the last contact of the User or the User's</p>



## Privacy Policy

					<ul style="list-style-type: none"> <li>IST's technical, marketing and commercial staff, in charge of analyzing the services proposed via the Platform;</li> <li>Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	request to delete personal data made to IST.
<p><b>Communicate with You about the Platform and its Contents</b></p>	<ul style="list-style-type: none"> <li>Identification and contact data (ex: Phone, mail, postal address, specialty, sub-specialty, etc.)</li> </ul>	Users	Consent to receive commercial information	IST	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's technical, marketing and commercial staff, in charge of sending commercial information;</li> <li>Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	Three years as from collection or last contact from you





## Privacy Policy

<p><b>Communicate with You about a Provider's Content or similar products or services</b></p>	<ul style="list-style-type: none"> <li>Identification and contact data (ex: Phone, mail, postal address, etc.)</li> </ul>	<p>Users</p>	<p>Consent to receive commercial information</p>	<p>Provider</p> <p>IST acts as data processor pursuant to the Providers instructions as determined within an agreement</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>The Provider's personnel in order to communicate itself on its Content, without IST acting as data processor;</li> <li>IST's marketing and commercial staff, in charge of sending commercial information;</li> <li>Authorized personnel of subcontractors as long as the contract signed between the subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.</li> </ul>	<p>Three years as from collection or last contact from you</p>
<p><b>Ask You for, collect and process Your opinions and comments about a Content</b></p>	<ul style="list-style-type: none"> <li>Identity and contact information;</li> <li>Opinion and, if applicable, comment related to a Content.</li> </ul>	<p>Beneficiary</p>	<p>The legitimate interest of IST, the Provider and their business partners in collecting your opinions and comments in</p>	<p>IST</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's staff, in charge of supporting the Provider and Beneficiaries, in charge of User relationship;</li> <li>Authorized personnel of subcontractors as long as the contract signed between the</li> </ul>	<p>Three years as from collection or last contact from you</p>



## Privacy Policy

			order to improve the Contents and report your satisfaction to the public		subcontractors and the data controller mentions the obligations incumbent on the subcontractors in terms of data security and confidentiality protection (Article 35 of the French Data Protection Act of January 6, 1978) and specifies, in particular, the security objectives that must be met.	
<b>Respond to and manage your requests to exercise your data protection rights</b>	<ul style="list-style-type: none"> <li>Email;</li> <li>Request content;</li> <li>ID proof of the User and/or his/her agent and/or legal representative.</li> </ul>	Users	Legal obligation: Only the individual concerned by the processing (if applicable his agent or legal representative) can exercise any action on this data (arts. 16 to 21 GDPR)	IST	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's staff, in charge of answering data protection rights requests.</li> </ul>	For 5 years from the date of the request, i.e. the limitation period set out in Article 2224 of the French Civil Code, so that IST can demonstrate the performance of its legal obligations.
<b>Detect and prevent fraud</b>	<ul style="list-style-type: none"> <li>Data analyzed by STRIPE RADAR.</li> </ul>	Users	Legitimate interest of IST in preventing fraud in connection with payments on the Platform	IST	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>STRIPE's personnel, in charge of controlling payments processed on the Platform.</li> </ul>	<p>Until payment in case of low risk.</p> <p>Until completion of analysis in case of moderate or high risk.</p>



## Privacy Policy

<p><b>Comply with a legal request</b></p>	<ul style="list-style-type: none"> <li>Any data requested by a judiciary authority</li> </ul>	<p>Users</p>	<p>Legal obligation to comply with a request made by a judiciary authority</p>	<p>IST</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's personnel, in charge of managing the Platform's databases.</li> </ul> <p><b>The judicial authority at the origin of the request is the recipient of the data.</b></p>	<p>This treatment consists of a transfer and does not induce storage.</p>
<p><b>Make the Platform and its functionalities available and ensure its proper functioning and continuous improvement</b></p>	<ul style="list-style-type: none"> <li>Cookies and other tracking devices left on your terminal in accordance with our Cookie Management Charter, accessible in the footer of the Platform.</li> </ul>	<p>Users</p>	<p>Consent, when applicable</p>	<p>IST</p>	<p><b>Within the limits of their respective responsibilities, may have access to personal data:</b></p> <ul style="list-style-type: none"> <li>IST's IT and marketing personnel;</li> <li>Third parties which may leave a cookie on your terminal (computer, tablet, phone...) when You consent to it (For more details, please consult our Cookie Management Charter available at the bottom of the Platform page.)</li> </ul>	<p>Up to 13 months from deposit on the User's terminal.</p>



## Privacy Policy

### WHO CAN ACCESS YOUR DATA?

In addition to the persons specifically indicated as "Recipients" within the explanatory table of purposes, the main persons who will likely have access to your personal data are:

- The service providers in charge of managing the Platform;
- With regard to the identification data of the person delivering the Content, the organizations in charge of delivering the DPC label;
- Public services exclusively to meet legal obligations;
- Authorized personnel of our subcontractors (if any);
- If applicable, the relevant courts, mediators, accountants, auditors, lawyers, bailiffs, collection companies, police or gendarmerie authorities in case of theft or judicial requisition, rescue;
- Content Providers, so that they can send you a Content evaluation form or communicate a change in the organization of the Content (change of speaker, agenda, location...)

Your personal data will not be shared, exchanged, sold or rented to anyone other than those mentioned below.

#### [More details on the list of our providers](#)

- STRIPE (Payment Service Providers): only have access to payment data and are strictly supervised;
- Travel Partner: if requested by the Beneficiary. The Travel Partner performs its own processing as a data controller;
- MIXPANEL has access to the following data: name/first name/specialty/email/time and place of connection and navigation on the Platform;
- SALESFORCE has access to the Beneficiary and Provider' data;
- SAGE (business management software) has access to Beneficiary data;
- GOOGLLEANALYTICS has access to anonymized browsing data (pages visited, actions on the site)
- FACEBOOK ADS has access to the following data: data generated by Facebook via the profile and the various activities performed by users, email address;
- LINKEDIN ADS has access to the following data: data generated by LinkedIn via the profile and the various activities performed by users, email address;
- GOOGLE ADS has access to the following data: data generated by Google via the profile and various activities performed by users, email address;
- AMAZON hosts the IST database - the type of data hosted by Amazon are (among others) personal data of the users: Name, First name, E-mail specialty, City, Country, RPPS, Company, Company address, Phone...;
- UNBOUNCE - has access to personal data entered in forms (last name/first name/specialty/function/email address/country);
- WOODPECKER has access to the following data: email address
- SENDINBLUE (transactional emails go through Mailjet) - has access to the following data: name/first name/email address/subject and body of the marketing emails sent;

## Privacy Policy

- ZOOM (Zoom retrieves Last Name First Name and Email Address).
- 

### IS YOUR DATA TRANSFERRED OUTSIDE OF THE EUROPEAN UNION?

Some of IST's subcontractors may transfer personal data outside of the European Union as part of the processing.

These subcontractors are the following:

- FACEBOOK: more information [here](#) ;
- GOOGLE: more information [here](#);
- RESEARCHGATE: more information [here](#);
- SENDINBLUE: more information [here](#);
- WOODPECKER: more information [here](#);
- SEMRUSH: more information [here](#).

IST sets up all appropriate measures to ensure that these subcontractors provide guarantees with regard to the regulations on the protection of personal data.

### WHAT ARE YOUR DATA PROTECTION RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with the applicable regulations, You have the following rights:

- Right of access (Article 15 GDPR), to rectification (Article 16 GDPR), update, completeness of your data;
- Right to erasure (Article 17 GDPR), when it is inaccurate, incomplete, equivocal, outdated, or whose collection, use, communication or storage is prohibited;
- Right to withdraw your consent at any time (Article 13-2c GDPR);
- Right to limit the processing of your data (Article 18 GDPR);
- Right to object to the processing of your data (Article 21 GDPR);
- Right to portability of the data You have provided to us, where your data is subject to automated processing based on your consent or on a contract (Article 20 GDPR);
- Right to define the fate of your data after your death and to choose that we communicate (or not) your data to a third party that You have previously designated.
- In the event of your death and in the absence of instructions from You, we undertake to destroy Your data, unless its retention is necessary for evidential purposes or to meet a legal obligation.

To find out more about the regulations relating to your "Data Processing and Freedom" rights, we invite you to consult the [dedicated section on the CNIL website](#) (in French).

---

## Privacy Policy

You can exercise the rights mentioned above by simple request:

- By email to [dpo@invivox.com](mailto:dpo@invivox.com) or
- By mail to the address: In Situ Training, 21 rue Eugène et Marc Dulout - 33600 PESSAC FRANCE.

Whatever the right invoked, You must prove your identity by any means and justify a legitimate reason when required by law (in particular in case of opposition to the processing).

To learn more about your rights, You can also visit the CNIL website, accessible at the following address: <https://www.cnil.fr/en/home>.

Finally, you can file a complaint with the CNIL at this address: <https://www.cnil.fr/en/plaintes> (in French).

## WHAT ABOUT COOKIES AND OTHER TRACKING DEVICES?

On its Platform, IST uses connection data (date, time, Internet address, your computer's protocol, pages consulted) and cookies (small files saved on your computer) to identify You, to remember Your visits, and to benefit from measurements and statistics on the Platform's audience, particularly in relation to the pages consulted.

You will find more details on the management of cookies and their purposes in our Cookie Management Charter, accessible at the bottom of the Platform page.

## WHAT SECURITY MEASURES HAVE BEEN IMPLEMENTED TO PROTECT YOUR DATA?

IST and its potential subcontractors undertake to implement all technical and organizational measures to ensure the security of its personal data processing and the confidentiality of your data, pursuant to the French Data Protection Act, in its version applicable on the day of consultation of the Privacy Policy, and GDPR.

In this respect, IST takes the necessary precautions, with regard to the nature of your data and the risks presented by its data processing, to preserve the security of the data and, in particular, to prevent it from being distorted, damaged, or accessed by unauthorized third parties (physical protection of the premises, User authentication process with personal and secure access via confidential Identifiers, logging of connections, encryption of certain data, etc.)

IST also conducts regular audits, otherwise known as "penetration tests", carried out by a specialized external company, in order to guarantee the security of the data of Content Beneficiaries, the results of which are available at the request of the Providers.