Privacy policy

Your privacy remains a priority for LINXO (hereinafter ("LINXO" or "we")). In this regard, we are committed to respecting the personal data of our online users (hereinafter "you"), treating it with the utmost care and ensuring the highest level of protection in accordance with the EU Regulation 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR") and the French Data Protection Act n°78-17.

By using the services provided by LINXO, you agree to provide us with some of your personal data (hereinafter "PDS") so that we can provide you with said services.

The PDS collected will be processed in order to guarantee its confidentiality and integrity in accordance with current provisions and in compliance with national and international legal requirements.

By processing of your PDS, we mean any form of automated processing carried out by LINXO. This concept encompasses any operation that we carry out on the basis of a natural person's personal data, such as collection, recording, modification, deletion, consultation, communication, use, etc., of such data.

In particular, the purpose of this privacy policy is to inform you:

- The type of PDS we collect in order to provide you with services and the reasons for such collection,
- The ways in which your PDS is used by LINXO,
- How cookies are managed on our sites and applications,
- Your rights regarding your PDS and how to exercise them.

1. Who is responsible for the use of your data in the context of your relationship with our services ?

The joint controllers of the processing of your PDS described in this privacy policy are LINXO's subsidiaries, namely LINXO GROUP, and LINXO CONNECT whose registered offices are located Espace Wagner bâtiment E, 10 rue Parayre - 13290 Aix-en-Provence. This privacy policy reflects the agreement reached between them in order to facilitate the exercise of your rights. Any questions or requests concerning the processing of your personal data can be sent to the following e-mail address: dpo@linxo.com. You may exercise your rights with respect to LINXO and the Joint Processors in accordance with the GDPR.

2. Why do we collect your personal data and on what basis ?

We collect PDS about you for the reasons and purposes described below.

LINXO collects and uses your PDS to operate efficiently and provide you with the best possible user experience with its services.

Please also be aware that we may only collect and use your PDS if such use is based on one of the legal grounds determined by Article 6 of the GDPR (legal basis) (For example, your consent or the performance of a contract entered into with us).

The table below lists precisely the purposes for which LINXO and its joint data controllers use your PDS, the legal basis for the corresponding processing and the type of PDS collected and/or processed.

PURPOSE OF COLLECTING YOUR PDS	LEGAL BASIS FOR PROCESSING PDS	TYPES OF PDS COLLECTED BY LINXO
1/ Provision of a personal finance software package The provision of a personal finance management software package in hosted mode (the LINXO and/or LINXO Premium Services).	The performance of a contract entered into with you (article 6.1.b of the GDPR), in this case the subscription to the service LINXO	Collected directly from you : • Email address
2/ Provision of an aggregation service for extended and savings accounts Provision of a hosted software package for aggregating extended and savings accounts.	Your consent (article 6.1.a of the GDPR), in this case your wish to aggregate your accounts	Collected directly from you : • Authentication elements from banks Collected indirectly : • Account numbers • Last name / first name • Bank transactions
3/ Provision of a payment initiation service The provision of a payment initiation software package in hosted mode	Your consent (article 6.1.a of the GDPR), in this case your wish to initiate a payment	Collected directly from you : • Beneficiary information • Transaction information (amount, wording)
4/ Data anonymization for statistical purposes For statistical purposes" refers to any operation involving the collection and processing of personal data required for statistical surveys or the production of statistical results. These statistical results may also be used for other purposes, in particular to improve our services. Statistical purposes imply that the result of processing for statistical purposes does not allow any identification of the persons whose information has been used. This data, once anonymized, may also be used for various other purposes:	LINXO's legitimate interest (Article 6.1.f of the GDPR) in processing the PDS of its Customers in order to improve the services offered and to have a better understanding of the target audiences	No PDS collected as part of this processing

• To enable us to maintain the free part of the service and to improve it by generating income for ourselves through the resale of anonymous data for statistical purposes. • Or to enable us to gain a better understanding of our target audiences.		
5/ Information about new features offered by LINXO, new services and products from LINXO and its partners Your PDS are used to present you with additional services (for which you may have to pay) such as the LINXO Premium service and offers from LINXO's partners. In the latter case, these prospecting operations ensure the operation of the LINXO Service, in particular by offering advertising space to advertisers.	LINXO's legitimate interest (Article 6.1.f of the GDPR) in processing the PDS of its Customers in order to inform them of new features offered by LINXO, new services and products emanating from LINXO and its partners	No PDS collected as part of this processing
6/ Meeting our regulatory obligations In particular as part of the fight against fraud, money laundering and the financing of terrorism	The need for LINXO to comply with a legal obligation (article 6.1.c) to which it is subject	Collected directly from you: • Information relating to your identity (surname, first name and place of birth)
7/ User support When you make a support request, your request is recorded in our incident database to ensure that it is dealt with efficiently. Our support team may need to access (in a secure and traceable way) your information and parameters hosted in the LINXO software to diagnose and resolve certain incidents (but at no time does it have access to your bank details).	The performance of a contract entered into with you (article 6.1.b) of the GDPR), in this case assistance in using the service LINXO	Collected directly from you : • Email address • Any personal information enabling us to process your request and verify its legitimacy

8/ Claims processing If you wish to make a complaint, we require certain information in order to process your request.	The need for LINXO to comply with a legal obligation (article 6.1.c) to which it is subject	Collected directly from you : • Email address • Any personal information enabling us to process your request and verify its legitimacy
9/ Organization of competitions When you take part in a competition, we need to identify you so that we can contact you if you win.	Your consent (article 6.1.a) of the GDPR) and in this case your wish to participate in this game	Collected directly from you : • Email address • Information about your social network accounts (e.g. Instagram)
10/ Testing programs We call on volunteer testers to help us test new software versions.	The performance of a contract entered into with testers (article 6.1.b of the GDPR)	Collected directly from you : • Email address • First name, Last name • Phone number
11/ Audience measurement	The performance of a contract concluded with you (article 6.1.b of the GDPR)	No PDS collected as part of this processing
12/ Questionnaires and surveys	LINXO's legitimate interest in processing the PDS of its Customers in order to ask their opinion on the application and improve it.	Collected directly from you: • Email address according to user preference
13/ Ensuring application security	LINXO's legitimate interest (Article 6.1.f of the GDPR) in processing PDS in order to ensure the security of the service provided.	Collected directly from you : • IP address

3. Cookies and other tracers

To enhance your user experience when visiting our site, we use cookies to store your login information, provide you with a secure connection, collect statistics to optimize site functionality and tailor content to your interests.

PDS may also give rise to commercial solicitation on our part. However, you may modify your communication preferences at any time. When you visit our site, information relating to your browsing habits may be recorded in "cookie" files installed on your terminal (computer, tablet, smartphone, etc.), subject to your preferences.

The information described below will help you understand how cookies work, and how to configure them via the "Cookie management" menu.

What is a cookie ?

A cookie is a small text, image or software file containing information that is stored on the hard disk of your terminal (e.g. computer, tablet, smartphone or any device used for browsing the Internet) when you visit a website or application using your browser. It is transmitted by a website's server to your browser. The cookie file records the pages you visit, the advertisements you click on and the type of browser you use, and enables its issuer to identify the terminal in which it is stored, for the duration of the validity or storage of the cookie concerned.

If your terminal is used by several people, and when the same terminal has several browsers, we cannot be certain that the services and advertisements intended for your terminal correspond to your own use of this terminal and not to that of another user.

Which cookies are used ?

Purpose	**Description**
Performance cookies	These cookies enable us to count visits to our Web/App and traffic sources, quantify the number of users and thus measure and analyze user activity statistically.
Functional cookies	These cookies enable you to access the service with predefined characteristics according to a series of criteria such as language, type of browser used to access the service, your regional configuration, etc.
Necessary cookies	These cookies are necessary for navigation and the smooth operation of our Web/App. They enable us, for example, to control traffic and data communication, access restricted areas, complete the order purchasing process, use security features, etc.
Social cookies	These cookies are set by various social networking services that we have added to the site, to enable you to share our content with your friends and networks.

Cookie management

Cookie type	**Manager**

Internally managed cookies	These cookies are created or managed by us as our Web/App manager.
Third-party cookies	These cookies are managed by service providers external to our services : • Google Analytics • Appsflyer • Mixpanel • Appcenter • Firebase • Facebook • Twitter • Braze

How long do these cookies last ?

All optional cookies used for our services are valid for 6 months or less. Your refusal to validate these cookies is also taken into account for a period of 6 months.

Some of the mandatory technical cookies issued and deposited for our services are kept as long as the browser takes the session into account; other mandatory technical cookies are valid for one year.

Who are the data processors ?

Organization collecting PDS	**Purpose(s)**
PDS collected by LINXO and by joint processors (LINXO GROUP and LINXO CONNECT)	Statistical tracking and personalized advertising
PDS collected by third parties (Twitter, Facebook etc) only if you activate the sharing features	Sharing features on social network

4. With whom do we share your personal data ?

In the course of our business, it may be necessary for us to share your PDS. Nevertheless, we assure you that we always do so in such a way as to guarantee optimum protection of your personal data.

In this respect, we ensure that all our partners comply with the obligations set out in the GDPR through the contractual commitments entered into with them. Most of our partners are located in the European Union, and for those outside the European Union, we have carried out an analysis to ensure that their commitment to the GDPR is respected, and that they have signed standard contractual clauses or committed to respecting binding corporate rules.

5. How long do we keep your PDS ?

LINXO service users' PDS's are stored in LINXO's main system for the duration of the contractual relationship between you and LINXO. These relations are terminated under the conditions set out in the "Resolution and Termination - Duration" article, to which is added a backup period of a maximum of 6 months (except in the case of regulatory exceptions).

6. How do we ensure the security of your PDS ?

LINXO implements numerous measures to ensure the integrity, confidentiality and availability of your PDS. To this end, LINXO uses encryption methods based on state-of-the-art public standards, enabling any PDS concerning you to be transmitted securely. Finally, LINXO CONNECT's services are covered by ISO 27001 certification.

7. How can you exercise your rights in relation to your PDS ?

You have the right to consult and modify your personal data free of charge.

You can also exercise your right to erasure, portability, oblivion, limitation of processing and opposition under the same conditions, as well as lodge a complaint with a supervisory authority (in France, the CNIL).

To exercise these rights, simply send us a request, stating your full name and indicating in the subject line which right(s) you wish to exercise.

Your written request must be signed and accompanied by a photocopy of your identity document (valid identity card or passport). The request must also specify the e-mail address to which we should send you a reply.

We will do our utmost to ensure that the requested actions are undertaken as quickly as possible and no later than one month after receipt of the request and the supporting documents necessary for its processing in accordance with the GDPR.

In the event of a particularly complex request, regulations stipulate that this deadline may exceptionally be extended by two months (Article 12.3 of the GDPR).

DPO contact details:
Linxo Connect DPO
Espace Wagner bâtiment E, 10 rue Parayre, 13290 Aix les Milles, France
dpo@linxo.com