

# Librestream General Data Protection Regulation FAQs

## Overview

*General Data Protection Regulation (GDPR)* is a European Union (EU)/European Economic Area (EEA) regulation for information privacy. It grants users specific rights, protection, and control over how and when their personal data is processed, stored, and transferred. In a digital world, *GDPR* defines:

- An individual's fundamental rights
- The obligations of companies who process data
- Methods to enforce compliance
- Sanctions for companies who breach these regulations

## GDPR Compliant Companies & Services

### Librestream

As a Canadian company, Librestream is subject to the Canadian *Personal Information Protection Electronic Documents Act (PIPEDA)*, Canada's privacy legislation. *PIPEDA* is compatible with the General Data Protection Regulation (EU) 2016/679. *PIPEDA* received the European Commission's stamp of approval by an adequacy ruling made in favor of its commercial organizations at the end of 2001. Refer to [Adequacy decisions](#) for details on rulings and further references (e.g., GDPR Article 45, Decision 2020/2/EC, and Directive 95/45/EC). Furthermore, Librestream has designed its privacy policy to ensure compliance with *GDPR*. Canada's Data Privacy Act, an amendment to *PIPEDA*, was adopted on June 18, 2015. Librestream is also willing to enter into a *Data Processing Addendum (DPA)* based on the *GDPR*, as requested by customers.

### Microsoft Azure

Microsoft has relocated its contractual commitments to *GDPR* in the Online Services *DPA*:

<http://microsoft.com/licensing/docs/view/Microsoft-Products-and-Services-Data-Protection-Addendum-DPA>,

which provides Microsoft's privacy and security commitments, data processing terms, and *GDPR* Terms for Microsoft-hosted services. These terms commit Microsoft to the requirements of processors in GDPR Article 28 and other relevant articles of the *GDPR*.

## Librestream & GDPR Compliance

**Question:** Is Librestream compliant with the *GDPR*?

**Answer:** Yes, Librestream is fully *GDPR* compliant.

### GDPR Requirements

**Question:** How does Librestream address the requirements of the *GDPR*?

**Answer:** Librestream has a documented privacy policy and operates an *Information Security Management System (ISMS)* certified to ISO/IEC 27001:2013 (Certificate Number: IS 698825) and ISO/IEC 27018:2014 (Certificate Number: PII 716086) as issued and audited by *The British Standards Institution (BSI)* auditors.

Refer to Librestream's certificates at:

- <https://librestream.com/media/pdfs/ISOcertification/IS-698825-2020.pdf>
- <https://librestream.com/media/pdfs/ISOcertification/PII-716086.pdf>

Appropriate physical and process-based safeguards are in place to protect customer data. Customers can:

- Request copies of their data.
- Update or provide corrections to the data on file.
- Specify potential uses of their data.
- Request to delete their personal information.

## Cloud Service Providers

**Question:** Who are Librestream's cloud service providers?

**Answer:** Librestream uses [Microsoft Azure](#) for Hosted Services.

**Question:** Where are Librestream's cloud service providers located?

**Answer:** Onsight NOW depends on [Azure Communications Services](#) to provide global coverage.

**Question:** Can Librestream still be [GDPR](#) compliant while hosting outside the EU?

**Answer:** Yes.

## EU-US Privacy Shield

**Question:** How has Librestream addressed the invalidation of the EU-US Privacy Shield?

**Answer:** Librestream and its cloud providers use [DPAs](#) based on the [Standard Contractual Clauses \(SCC\)](#) and EU model clauses and do not rely on certification to the EU-US Privacy Shield. In July 2020, the Court of Justice of the European Union (CJEU) ruled (<https://perma.cc/9A6H-UXF9>) that Decision 2010/87 on standard contractual clauses (<https://perma.cc/JNS5-ACLD>) remained valid.

## Privacy Statement

**Question:** Where is Librestream’s Privacy statement located?

**Answer:** Refer to Onsight NOW's [Privacy Policy \(on page 3\)](#).

## Privacy Policy

### Information & Use

**Question:** What personal information does Onsight NOW collect to do business with me?

**Answer:** Onsight NOW collects the following information:

1. Full Name: We store a person's name in several places that include:
  - A call participants list for collections
  - Call transcripts
  - Call summaries
  - Chat summaries
2. Email Address

No other [Personal Identifiable Information](#) is stored.

**Question:** How does Librestream use this information?

**Answer:** The main reasons Librestream collects personal information include:

- Processing orders
- Completing a sale/transaction
- Providing customer service
- Updating customer relationship management information
- Offering marketing information
- Servicing warranties
- Servicing returns
- Supporting Internal analytic processes
- Authentication purposes

### Your Rights for Personal Information

**Question:** What rights do I have regarding Librestream’s use of my personal information?

**Answer:** You have the right to:

1. Be informed about the collection and use of your personal information.
2. Access and receive a copy of your personal information and any other supplementary information Librestream stores.
3. Have inaccurate personal information rectified/corrected or completed if it is incomplete.
4. Request the deletion or removal of your personal information.
5. 'Block' or restrict processing of your personal information.
6. Obtain and reuse your personal information for your purposes across different services.

7. Object to the processing of your personal information in certain circumstances.
8. Not be subject to a decision based on automated processing where it produces an adverse legal effect or significantly affects you. You have the right to obtain human intervention, express your point of view, get an explanation of the decision, and challenge it.

## Promotional & Marketing Information

**Question:** Can I opt out of marketing or promotional information?

**Answer:** Of course! You can opt out of receiving marketing/promotional information from us at anytime by clicking the **Unsubscribe** link.

## Service Information & Use

**Question:** How do Librestream’s services use this information?

**Answer:** Librestream uses this information to:

1. Facilitate Onsight sessions.
2. Provide usage reporting information.
3. Perform troubleshooting and support for the Onsight platform.
4. Perform internal analytics to improve workflow and software improvements.

## Shared Information

### Shared Information For Onsight NOW

**Question:** What information is shared when using Onsight NOW?

**Answer:** The customer's tenant will provide most of the required information. Services hosted by Librestream are segregated by tenant and will retain the following account data:

- Onsight NOW username and password hash
- The user’s full name is stored as a call participant for collections, transcripts, call and chat summaries
- The user’s email address
- No other *Personal Identifiable Information (PII)* is stored

Customers have the option of hosting their data themselves. In this case, Librestream will not have access to this information.

### Shared Information for Onsight Flow

**Question:** What information is shared when using Onsight Flow?

**Answer:** Onsight Flow retains the following account data:

- Username and password
- User email address
- Location (if enabled on the device)
- Device name and type
- IP address
- Log data — This may include records of user activity on both the client application and the dashboard web application, including user names, email addresses, IP addresses, geographic locations, and names/makes/models/operating systems of connected devices.
- Application events — This may include the start and end times and dates of application sessions and application crashes, including user names, user email addresses, IP addresses, geographic locations, and names/makes/models/operating systems of connected devices.
- Job results

## Shared Information with Third Parties

**Question:** Does Librestream share my information with third parties?

**Answer:** If it's a necessary part of any of the transactions listed above, Librestream may need to disclose your information to another company. For example, using a name and address to send a package delivery using a courier company. Librestream does not sell your personal information to any third parties. Librestream may be required to disclose personal information in case of a court order or operation of law.

## Data

### Media, Images, Audio & Video Files

**Question:** Do Librestream's services store my media, such as images, audio, or video files?

**Answer:** You can capture images, audio, or video files within your organization's SharePoint service. You have the option to store this information on Librestream servers. You can also turn off still image capture, audio, and video recordings for all endpoints based on your business and privacy requirements.

### Data Storage Location

**Question:** Where do Librestream services store data?

**Answer:** Librestream's hosted services are cloud-based and are available in multiple regions worldwide, depending on your location.

### Data & Information Protection

**Question:** How does Librestream protect my information and data?

**Answer:** Librestream is certified for both ISO 27001:2013 and ISO 27018:2014 and has suitable physical and process-based safeguards to keep your information secure.

### Data Retention

**Question:** How long does Librestream keep my information and data?

**Answer:** Librestream stores your information and data for the services you procure from Librestream. When you unsubscribe, Librestream deletes your information and data within 60 days.

### Data Analytics

**Question:** Does Librestream perform analytics based on customer data?

**Answer:** Librestream uses customer data for internal analytics to improve workflows and software to better understand customer usage trends for its internal business processes. This data is strictly used internally and not shared with third parties. You may request that your data not be used for this purpose and to have it deleted from the internal analytics process at any time.

## Third Party

**Question:** Does Librestream use any third parties?

**Answer:** Librestream may enter into agreements with third parties for necessary aspects of its services, such as:

- Hosted/cloud services
- *Geolocation (GeoIP)* location
- Captcha services
- *Secure Sockets Layer (SSL)* certifications
- Sending guest invites via *Short Message Service (SMS)*/email

## GDPR Compliance

**Question:** Is Librestream compliant with the [GDPR](#)?

**Answer:** Yes — Librestream fully complies with the [GDPR 2016/679](#) (GDPR).

## Questions Privacy Concerns

**Question:** Who do I contact if I have concerns or questions about privacy?

**Answer:** For any concerns related to the privacy of the information you share with us, please get in touch with us at [privacy@librestream.com](mailto:privacy@librestream.com) or at:

Librestream Technologies Inc.  
 Attention: Data Protection Officer  
 167 Lombard Ave, Suite 500.  
 Winnipeg, Manitoba Canada,  
 R3B 0V3

If you are dissatisfied with our response to your privacy concerns. In that case, you may contact the Office of the Privacy Commissioner at 1-800-282-1376 or the Privacy Commissioner in your respective state, province, or country.

## Data Anonymization

**Question:** When will provide automated anonymization capabilities?

**Answer:** Librestream can provide the right to erasure, also known as the [Right To Be Forgotten \(RTBF\)](#), upon request. Please contact Librestream's technical support team directly to activate this feature. Refer to [Contact Support \(on page 9\)](#).

When [RTBF](#) is activated, deleted users will automatically have their [PII](#) anonymized. Their username, email address, and events will no longer be available for display in reports and call statistics. Anonymization protects the user's identity and the system will insert a pseudonym instead of their actual name.



**Note:** Call statistics, reports, and events will still contain the anonymized data to support analytics and reporting.

Data Anonymization of [PII](#) occurs when:

- The system deletes a user account.
- The system deletes a guest user, and their account expires.



**Note:** Onsight Workspace and SharePoint content are the customer's property. As such, the company is responsible for all content. When an administrator deletes a user, the system automatically deletes the Workspace and SharePoint account as well. The customer must choose to delete the user's content as required.

Additionally, upon request, Librestream can:

- Anonymize previously deleted users from your domain — Previously deleted users won't appear within your user lists. However, their data will still be available for reporting if not anonymized.
- Anonymize active user data — When enabled, data will no longer be associated with the active user. Data will still show usage within the given time.

## Customers

**Question:** Will customers be *GDPR* compliant using Librestream’s programs or services?

**Answer:** Librestream provides customers several methods to explicitly collect and log user consent, such as the custom messaging feature. Customers may also use service contracts, collect explicit opt-in consent before starting an Onsight Session, or obtain consent via controls in an *Identity Provider (IdP)* (when Single Sign On is purchased and enabled for the user).



**Note:**

1. Librestream is a data processor. As a result, Onsight NOW processes the data, but it doesn't generate the data or directly interact with the end-users.
2. Librestream uses contracts with customers to get explicit opt-in consent. Librestream customers have users on Onsight NOW and must get explicit opt-in consent using custom messages.
3. At present, Onsight NOW doesn't enable customers to use custom messages to get explicit opt-in consent from their users.

## GDPR Audits

**Question:** Is Librestream audited to be *GDPR* compliant?

**Answer:** There is no certification or audit process for *GDPR* compliance. However, Librestream’s privacy policy is part of its *ISMS*. Accredited external auditors (*BSI*) evaluate this system to ensure compliance with ISO 27001 and 27018 (Cloud Privacy) standards and other applicable standards. BSI’s auditing is accredited by the *ANSI National Accreditation Board (ANAB)*. *ANAB* is a signatory of the *International Accreditation Forum (IAF)* and the *International Laboratory Accreditation Cooperation (ILAC)* and is assessed to ISO/IEC 17011.

Refer to Librestream’s certificates at:

- <https://librestream.com/media/pdfs/ISOcertification/IS-698825-2020.pdf>
- <https://librestream.com/media/pdfs/ISOcertification/PII-716086.pdf>

## Data Sharing

**Question:** What data is shared when using Librestream’s services?

**Answer:** Refer to the following sections within the Privacy Policy:

- [Shared Information For Onsight NOW \(on page 4\)](#)
- [Shared Information for Onsight Flow \(on page 4\)](#)

### Sensitive Data

**Question:** Does Librestream process special (sensitive) categories of personal data?

**Answer:** Librestream doesn't collect or process any data from Article 9 of GDPR (Special categories of personal data) without obtaining consent through controls in an *IdP* when Single Sign On is purchased and enabled for the user or before starting an Onsight Session.

## Customer Limits for Data Collection & Storage

**Question:** How can customers limit what data is collected or stored?

**Answer:** Customers can capture images, record audio or video files, and store them locally on an Onsight endpoint or using Onsight Workspace on Librestream servers. As an option, customers can disable the storage of still images and audio and video recordings for all endpoints based on their specific business and privacy requirements.

In OnSight NOW, audio, video, and images are utilized using your SharePoint service. Customer administrators can manage permissions for participants when saving files.

Customer administrators for **OnSight Workspace** can use licenses to permit end users to store audio, video, and images on Librestream servers.

OnSight NOW does not collect location details for images.

OnSight NOW users can share collection data stored in SharePoint with other end users. SharePoint users can capture, store, and share images, audio, and video. Customers typically use their SharePoint location. However, you can make arrangements to store this information on Librestream servers.

**OnSight Flow** users who can create job templates are responsible for determining the type of data collected for each job. For example, if none of the job templates have a video collection, the system will not store any videos.

## Privacy Breach Notifications

**Question:** What are Librestream's privacy breach notification timelines?

**Answer:** Librestream will inform customers of a privacy breach as soon as possible but within a maximum of 72 hours from the occurrence.

## Data Sovereignty

**Question:** How does Librestream handle other data sovereignty concerns?

**Answer:** Librestream recommends using OnSight globally deployed servers to handle edge case performance issues. Refer to [Customers \(on page 7\)](#) for why Librestream is **GDPR** compliant with its worldwide deployments.

Librestream has hosted infrastructure in the EU with full region locking planned. US region locking is available.



# Appendix

## Contact Support

For Support inquiries:

- **Email:** [support@librestream.com](mailto:support@librestream.com)
- **Web:** <https://librestream.com/contact-us-support/>
- **Phone:** 1.800.849.5507 or +1.204.487.0612



Figure 1. Contact Support QR Code

## Glossary

### American National Standards Institute

The American National Standards Institute (ANSI) is a private, non-profit organization that supports the development of technology standards across various industries in the United States (U.S.).

American National Standards Institute (ANSI)

**ANSI**

### ANSI National Accreditation Board

The *American National Standards Institute (ANSI)* National Accreditation Board (ANAB) is a non-government, non-profit organization owned by the American National Standards Institute (ANSI). ANAB provides accreditation and training services to public and private sectors serving global markets.

ANSI National Accreditation Board (ANAB)

**ANAB**

### Azure Communications Services

### British Standards Institution

The British Standards Institution (BSI) is the recognized national standards body for the United Kingdom (UK). The BSI's objectives include promoting trade, reducing waste, and protecting the consumer.

The British Standards Institution (BSI)

**BSI**

### Data Processing Addendum

The Data Processing Addendum (DPA) is a contractual agreement between a data controller (Company) and a data processor (Third-party service provider) that regulates personal data processing by following the *GDPR* for business purposes.

Data Processing Addendum (DPA)

**DPA**

### General Data Protection Regulation

The General Data Protection Regulation (GDPR) is a European Union (EU)/European Economic Area (EEA) regulation for information privacy. It grants users specific rights, protection, and control over how and when their personal data is processed, stored, and transferred.

General Data Protection Regulation (GDPR)

**GDPR**

### Geolocation by Internet Protocol

Geolocation by *Internet Protocol (IP)* is a method for determining a user's location using their *IP* address.

Geolocation (GeoIP)

## GeoIP

## Identity Provider

An Identity Provider (IdP) is a service that creates, stores and manages digital identities while providing authentication services within a network.

Identity Provider (IdP)

## IdP

## International Accreditation Forum

The International Accreditation Forum (IAF) is the world association of conformity assessment for all accreditation bodies. The IAF goals include creating a unified global program for conformity assessment. This program aims to minimize risk for both businesses and their customers by issuing accredited certificates.

International Accreditation Forum (IAF)

## IAF

## International Laboratory Accreditation Cooperation

The International Laboratory Accreditation Cooperation (ILAC) is an international organization founded in 1996 to promote cooperation between global accreditation bodies operating by following ISO/IEC 17011.

International Laboratory Accreditation Cooperation (ILAC)

## ILAC

## Internet Protocol

Internet Protocol (IP) represents a unique string of characters that identifies each device on a network using an Internet Protocol address.

Internet Protocol (IP)

## IP

## Information Security Management System

An Information Security Management System (ISMS) provides a systematic approach to managing an organization's information security to minimize risk and limit the impact of a security breach. An ISMS uses policies, procedures, and controls to safeguard confidentiality, integrity, and the accessibility of data.

Information Security Management System (ISMS)

## ISMS

## Microsoft Azure

Azure is a cloud computing service created by Microsoft for building, testing, deploying, and managing applications and services through Microsoft-managed data centers.

## Personal Identifiable Information

Personal Identifiable Information (PII) constitutes any data that can be used to identify or trace an individual's identity, such as a username, email address, social security number, and telephone number.

Personal Identifiable Information (PII)

### PII

## Personal Information Protection & Electronic Documents Act

The Personal Information Protection Electronic Documents Act (PIPEDA) is a Canadian law that governs data privacy and how organizations collect, use, or disclose personal information. PIPEDA is compatible with the [GDPR](#) (EU) 2016/679.

Personal Information Protection Electronic Documents Act (PIPEDA)

### PIPEDA

## Right To Be Forgotten

The Right To Be Forgotten (RTBF) is a crucial element within the [GDPR](#). RTBF grants individuals the right to have private information, including a person's name, removed from internet searches and online directories.

Right To Be Forgotten (RTBF)

### RTBF

## Secure Sockets Layer

Secure Sockets Layer (SSL) enables a secure internet connection and safeguards sensitive information transmitted between two systems. SSL provides encryption and server authentication over the internet.

Secure Sockets Layer (SSL)

### SSL

## Short Message Service

People generally describe Short Message Service (SMS) as text messaging.

Short Message Service (SMS)

### SMS

## Standard Contractual Clauses

Standard Contractual Clauses (SCC) govern the lawful exchange of personal information between parties transferring data from the EEA to non-EU countries. SCC provides a model data transfer mechanism to safeguard and facilitate data transfers.

Standard Contractual Clauses (SCC)

### SCC