

ARCY - GDPR Privacy Policy

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1. General Information

1.1. Purpose of this Privacy Policy

ARCY SASU (“ARCY”, “we”, “us”, or “our”) is a technology company based in France. We develop and operate computer vision software powered by artificial intelligence, including tools for object recognition and counting from images.

This privacy policy is intended to inform you, as a user of ARCY’s websites and services, about how we collect, use, store, and protect your personal data, in compliance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation – GDPR);
- French Data Protection Act No. 78-17 of 6 January 1978 (Loi Informatique et Libertés).

We are committed to ensuring transparency, minimization of data collection, and the protection of your personal rights. This policy also explains how to exercise your rights under applicable data protection regulations.

For any question regarding data protection, please contact us at **contact@arcy.app**.

1.2. When this Policy Applies

This Privacy Policy applies to the following situations:

- When you visit our official website at <https://www.arcy.app>;
 - When you create an ARCY account and use our image recognition and object counting tools;
 - When you upload a photo or image to use our services;
 - When you send us a message through a contact form;
 - When you interact with ARCY as a client, user, partner, or prospect;
 - When you subscribe to updates or request a demonstration of our technologies.
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2. Identity of the Data Controller and Supervisory Authority

2.1. Data Controller

The data controller responsible for processing your personal data is:

ARCY

Société par Actions Simplifiée à associé unique (SASU)

SIREN: 937 957 785

60 rue François 1er

75008 Paris, France

Email: **contact@arcy.app**

ARCY is legally represented by Mr. Younès Léopold DOLLÉ in his capacity as President.

2.2. Hosting and Technical Providers

All data is hosted in France by **OVHcloud**, in compliance with European data protection standards. ARCY may use external technical providers for service delivery and maintenance, strictly within the scope of their contractual obligations and instructions.

2.3. Data Protection Officer (DPO)

ARCY has not appointed a Data Protection Officer (DPO) at this time.
Mr. Younès Léopold Dollé, President of ARCY, currently acts as the internal point of contact for all matters related to data protection.

2.4. Supervisory Authority

The competent supervisory authority for data protection in France is:

Commission Nationale de l'Informatique et des Libertés (CNIL)

3 Place de Fontenoy, TSA 80715

75334 Paris Cedex 07, France

Website: <https://www.cnil.fr>

3. How We Collect Personal Data

3.1. What is Personal Data?

“Personal data” refers to any information that relates to an identified or identifiable natural person. This includes, for example:

- Identifiers such as your name, email address, or IP address;

- Visual content such as uploaded photos containing identifiable elements;
- Technical identifiers such as session logs or device fingerprints.

Data is considered personal even if it does not directly identify you, as long as it can be linked to you when combined with other information.

3.2. How Do We Collect It?

We collect personal data through the following means:

- When you upload a photo or image to use our image recognition or object counting services;
- When you create an account, including entering your email address and possibly a username;
- When you submit a message through our contact form or request a product demo;
- When you interact with our interfaces, which may collect IP address, browser information, and usage logs for security and service improvement purposes;
- When you save a project or result, linking it to your user profile (if applicable).

We do not collect any data from third-party platforms and do not use tracking cookies for marketing purposes.

4. Categories of Personal Data We Collect

4.1. Data Collected Directly from You

Depending on how you use our services, we may collect the following categories of personal data directly from you:

- Identification Data: Email address, name (if provided), and password (encrypted);
- Uploaded Content: Photos or images used for object recognition;
- Project Data: Saved detection results, project names, and timestamps;

- Messages: Content you send through contact forms or support requests.
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4.2. Data Collected Indirectly

ARCY does **not currently collect any personal data from third-party partners or services.**

However, we may log technical data automatically for security and diagnostic purposes, such as:

- IP address and approximate geolocation;
- Browser type and operating system;
- Login time, session duration, and error logs.

This data is used solely for technical operations, fraud prevention, and usage analytics (non-marketing).

5. Purposes, Legal Bases and Retention Periods

5.1. Purposes of Processing

ARCY collects and processes personal data only for the following legitimate and clearly defined purposes:

- To provide and maintain access to our services, including object recognition and image-based counting tools;
- To allow users to create and manage personal accounts;
- To save user projects and results on request;
- To respond to contact messages, support requests, and demo inquiries;
- To ensure the technical and security integrity of the services (log files, IP tracking, error reports);
- To comply with legal obligations, including data security, fraud prevention, and abuse management.

We do **not use personal data for advertising or marketing purposes.**

5.2. Legal Bases

Under Article 6 of the GDPR, the legal grounds on which ARCY relies to process your personal data include:

- Your consent – for data you voluntarily submit (contact form, photo uploads, account creation);
 - Performance of a contract – when you use our tools and services;
 - Legitimate interest – for technical logging, fraud prevention, and service improvement;
 - Legal obligation – where processing is required to comply with French or European law.
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5.3. Retention Periods

ARCY retains your personal data only for the time strictly necessary for each processing purpose:

Type of Data	Purpose	Legal Basis	Retention Period
Email and account info	Account creation and access	Contract / Consent	Until account deletion or 12 months of inactivity
Uploaded images (for detection)	Provide recognition service	Consent	Automatically deleted after processing
Saved project results	User access to past results	Legitimate interest	Up to 12 months, unless manually deleted

Contact form messages	Response to user inquiries	Consent	6 months
Technical logs (IP, browser, etc.)	Security and diagnostics	Legitimate interest	6 months

ARCY may anonymize data for statistical or service improvement purposes beyond these periods.

5.4. Data Minimization Policy

In accordance with the GDPR’s data minimization principle, ARCY only collects data that is:

- Adequate,
- Relevant,
- Limited to what is necessary for the intended purpose.

We do not require identification unless essential to provide the service (e.g., account creation). You can use certain features anonymously.

6. Who Has Access to Your Data?

6.1. Internal Access (ARCY Team)

Access to personal data is strictly limited to authorized personnel within ARCY who require access in order to:

- Operate and maintain the services,
- Provide technical support,
- Respond to user requests,
- Ensure data integrity and security.

All team members accessing personal data are bound by confidentiality agreements.

6.2. Technical Providers and Hosting (OVH)

ARCY relies on the following technical service providers, solely for the purposes of infrastructure and system operations:

- **OVHcloud (France)** – Hosting of application servers and data storage.

These providers act as data processors, operating under contract and only according to ARCY's documented instructions. No personal data is used for their own purposes.

6.3. No Transfer to Commercial or Marketing Partners

ARCY does **not** share, rent, or sell your personal data to any external business partners, advertisers, or data brokers.

We do **not** use third-party cookies, trackers, or embedded analytics for advertising purposes.

Your data is **never used for profiling or targeted marketing**.

7. Transfers Outside the European Union

7.1. No International Data Transfers

ARCY does **not transfer any personal data outside the European Union**.

All data is stored and processed within the EU, specifically in France, through our hosting provider **OVHcloud**, which complies with the applicable European data protection standards.

7.2. Infrastructure Hosted in France

All of ARCY's infrastructure, databases, and processing environments are hosted on servers located in **France**. No part of our processing pipeline involves countries outside the European Economic Area (EEA).

As a result:

- **No data is transferred to non-EU** jurisdictions;
- No standard contractual clauses (SCCs) or data transfer agreements are currently required;
- All data benefits from the protections guaranteed under the GDPR.

If, in the future, ARCY engages processors located outside the EU, we will ensure that appropriate safeguards (e.g., adequacy decisions or SCCs) are implemented in full compliance with Articles 44–49 of the GDPR.

8. Your Rights Under GDPR

In accordance with Articles 15 to 22 of the General Data Protection Regulation (GDPR), you have several rights regarding the personal data we hold about you. ARCY is committed to respecting and facilitating the exercise of these rights.

To exercise any of the rights listed below, please contact us at **contact@arcy.app**. We will respond within **one month** from the date of your request.

8.1. Right of Access

You have the right to request access to the personal data we hold about you, including:

- The categories of data collected,
 - The purposes of processing,
 - The recipients (if any),
 - The storage duration.
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8.2. Right to Rectification

If any personal data we hold is inaccurate or incomplete, you may request that we correct or complete it without undue delay.

8.3. Right to Deletion (Right to be Forgotten)

You may request the erasure of your personal data if:

- The data is no longer necessary for the purposes for which it was collected;
- You withdraw your consent;
- You object to processing based on legitimate interest and there are no overriding legitimate grounds;
- The data has been unlawfully processed.

Please note: some data may be retained if legally required (e.g., for accounting or fraud prevention purposes).

8.4. Right to Restrict Processing

You may request that we restrict the processing of your personal data if:

- You contest its accuracy;

- The processing is unlawful and you prefer restriction over deletion;
 - We no longer need the data, but you need it for legal claims;
 - You object to processing, pending verification of legitimate grounds.
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8.5. Right to Object

You have the right to object to the processing of your data based on our legitimate interest. In such a case, we will cease processing unless we can demonstrate compelling legitimate grounds.

8.6. Right to Data Portability

You may request to receive your personal data in a structured, commonly used and machine-readable format, and have the right to transmit that data to another controller without hindrance from us, where processing is based on your consent or contract.

8.7. Right to Lodge a Complaint

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the French data protection authority:

CNIL – Commission Nationale de l'Informatique et des Libertés

<https://www.cnil.fr>

8.8. Response Time and Notification

We will respond to any request related to your rights within **one (1) month**.

In some cases, this period may be extended by two additional months, in accordance with Article 12(3) of the GDPR, depending on the complexity or number of requests.

We will inform you of any such extension, along with the reasons, within the initial one-month period.

9. Security and Confidentiality Measures

ARCY implements appropriate technical and organizational measures to ensure a level of security appropriate to the risks associated with the processing of personal data.

We are committed to safeguarding your data against:

- Unauthorized access
 - Loss, destruction, or accidental alteration
 - Misuse, theft, or disclosure
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9.1. Technical Security Measures

- All data is hosted on secure servers located in France (OVHcloud).
 - Data transfers are encrypted via HTTPS (TLS).
 - Uploaded images are automatically deleted after processing unless explicitly saved by the user.
 - Passwords are hashed and salted using industry-standard encryption.
 - Access to production systems is restricted and monitored.
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9.2. Organizational Measures

- Access to personal data is limited to authorized personnel bound by confidentiality obligations.
 - Regular audits and monitoring are conducted to detect potential security issues.
 - We ensure that any third-party service providers (e.g., hosting) comply with GDPR security requirements through appropriate contractual agreements.
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9.3. Incident Response

In the event of a data breach likely to result in a high risk to your rights and freedoms, ARCY will:

- Notify the CNIL within 72 hours (as required under Article 33 GDPR),
 - Inform affected users without undue delay,
 - Take corrective actions to contain and mitigate the breach.
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10. Modifications to This Privacy Policy

10.1. Change Notification

ARCY may update this privacy policy from time to time, in particular to:

- Comply with changes in applicable laws or regulations,
- Reflect changes in our services or internal practices,
- Improve clarity and transparency for our users.

Whenever significant changes are made, we will notify users by:

- Displaying a banner or alert on our website,
- Updating the “last updated” date at the top of this document,
- If applicable, contacting you by email.

We recommend checking this page periodically to stay informed of any updates.

10.2. Previous Versions

Previous versions of this policy may be made available upon request.

You may contact us at **contact@arcy.app** for any clarification or historical reference.

