PicTalk

# Record of personal data processing activities

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**Entity**: Pictalk Speech Made Easy, French non-profit association (loi 1901), 13 rue Professeur Pierre Marion, 69005 Lyon, France · SIREN 911 547 222

**Representative**: Marie Caquineau, President · **Personal data contact**: alex@pictalk.org · **Data Protection Officer**: not appointed; requests are handled at this address

## 1. Processing activities for which Pictalk is the controller

| PROCESSING ACTIVITY | LEGAL BASIS | DATA SUBJECTS | DATA | RECIPIENTS AND PROCESSORS | TRANSFERS OUTSIDE THE EU | RETENTION |
|---|---|---|---|---|---|---|
| **Pictalk Buddy accounts and use (families and individuals)** | Performance of the contract (Terms of Use) | Users (legal representatives, carers), supported persons, including minors | Account (surname, first name, e-mail address, username), content (schedule, sequences, notebooks, pictograms, files), preferences, technical data | Authorised Pictalk staff; OVHcloud (hosting); users with whom the user shares; Mistral AI (EU, optional AI features) | None for accounts and content (hosted in France) | Until the account is deleted; automatic deletion after 1 year without login; backups 2 days |
| **Health data entered in the Service (article 9 of the GDPR)** | Explicit consent (article 9.2.a) | Supported persons | Information on health or disability revealed by the content entered | Authorised Pictalk staff; OVHcloud (HDS-certified hosting [HDS: French certification for health data hosting]); Mistral AI (EU, optional AI features) | None | As for the account; erasure as soon as the content or the account is deleted |
| **AAC communication logs** | Consent | AAC users | Pictograms used, sentences built | Authorised Pictalk staff; OVHcloud | None | 3 months maximum |
| **Account-related notifications and e-mails (reminders, address verification, password, inactivity)** | Performance of the contract | Users | Notification token, identifier, e-mail address, name | OneSignal (EU) | None | Lifetime of the account |
| **Usage statistics and error reports** | Legitimate interest (reliability and improvement of the Service) | Users | Usage events (no screen recording), error traces, device, identifier | PostHog (EU); Sentry (Germany) | None | PostHog: 14 to 30 days; Sentry: 90 days |

| PROCESSING ACTIVITY | LEGAL BASIS | DATA SUBJECTS | DATA | RECIPIENTS AND PROCESSORS | TRANSFERS OUTSIDE THE EU | RETENTION |
|---|---|---|---|---|---|---|
| **Pro memberships and in-app purchases: quotes, invoices, payments** | Performance of the contract; legal obligations (accounting) | Members, contacts at member organisations | Membership type, purchases, name, e-mail address, billing address, quotes, invoices (never card numbers) | Stripe; RevenueCat; Apple and Google (app stores) | RevenueCat: United States, standard contractual clauses; Stripe: Ireland and United States, Data Privacy Framework | Accounting records: 10 years; membership data: lifetime of the account |
| **Donations and tax receipts** | Legal obligations (articles 200 and 238 bis of the CGI (French General Tax Code)) | Donors | Amount, frequency, name, e-mail address, postal address | Stripe; OneSignal (sending of receipts) | Stripe: United States, Data Privacy Framework | Duplicates of receipts and supporting documents: 6 years (article L102 E of the LPF (French Book of Tax Procedures)) |
| **pictalk.org website: audience measurement and contact forms** | Consent (cookies); legitimate interest (responding to enquiries) | Website visitors, people who write to us | Audience measurement cookies (if accepted), IP address; name, e-mail address, organisation, message | Google (Analytics, with consent); Enzuzo (cookie banner); Netlify (hosting and forms) | Google: United States, Data Privacy Framework; Netlify: United States | Cookies: 13 months maximum; contact requests: 90 days |

## 2. Processing carried out on behalf of organisations (Pictalk as processor)

| PROCESSING ACTIVITY | CONTROLLERS | OPERATIONS | DATA SUBJECTS | DATA | SUB-PROCESSORS | TRANSFERS OUTSIDE THE EU | RETENTION |
|---|---|---|---|---|---|---|---|
| **Provision of Pictalk Buddy to member organisations (schedule, AAC, sequences, notebooks, groups)** | Each member organisation (list kept internally) | Hosting, storage, synchronisation, display, text-to-speech, notifications, backup, deletion | Supported persons (including minors), staff, families | Account, content, preferences, technical and usage data; possible health data | OVHcloud (France, HDS); PostHog (EU); Sentry (Germany); OneSignal (EU); RevenueCat; Mistral AI (EU, optional AI features) | RevenueCat: United States, standard contractual clauses; optional services (YouTube, ElevenLabs, ipify, Hugging Face), subject to safeguards or limited to the IP address | As set out in the data processing agreement (DPA): term of the contract, deletion on request within 30 days |

## 3. Security measures (all processing activities)

- Hosting in France with OVHcloud, HDS-certified; database accessible only from the cluster's private network.
- Encryption of communications (HTTPS/TLS); centralised authentication (Keycloak, hosted by Pictalk); access to production data restricted to authorised persons.
- Daily backup in a separate data centre (Strasbourg), retained for 2 days.
- No advertising, no resale, no advertising trackers in the application.
- Personal data breach management procedure: notification of organisations within 48 h and, where applicable, of the CNIL within 72 h.

*This public version does not contain the list of member organisations, which is kept internally. It supplements the privacy policy, the Security page and the data processing agreement (DPA).*