E S C A L E

# Privacy Policy

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Escale ("we") creates personalised audio stories. This policy describes what data we process, why, on what basis, and your rights.

The English version is the governing version. Any French translation is provided for convenience, subject to any mandatory requirements of applicable law.

## WHO WE ARE

Escale is published by Matthieu Deliry, a French sole trader registered under SIREN 107 581 100, acting as data controller.

Postal address: 3 rue de la Sablière, 78220 Viroflay, France. Email: contact@escalestories.com. Telephone: +33 9 77 83 27 18.

## PRIVACY OFFICER (NEW ZEALAND)

Privacy Officer: Matthieu Deliry Contact: contact@escalestories.com Postal address: 3 rue de la Sablière, 78220 Viroflay, France

## DATA WE PROCESS

- Account: your "Sign in with Apple" or "Sign in with Google" identifier and its email address (possibly a relay address if you chose "Hide My Email"). Your first name, provided by Apple or Google, is stored only on your device.

- Creations: your story parameters (genre, length, heroes, loved ones and their first names, place, era, idea, voice, language). They may contain personal data — such as your children's first names — that you freely choose to provide.

- Generated content: the text, audio and PDF book of your stories.

- Purchases: the Apple or Google transaction identifier, the product bought and the consent proof tied to the purchase (see the Terms), to verify payment, prevent duplicates and keep proof of the contract. We never see your payment details.

- Notifications: a technical token if you opt in to be told when a story is ready.

- Reports: the position of a flagged passage and your optional description, to improve quality.

- Support: if you write to us, your message and the technical details attached to it (app version, device model, account identifier, story concerned), so we can answer effectively.

We run no targeted advertising and never sell your data.

## WHY WE PROCESS IT — GDPR LEGAL BASES

- Create your account, generate, deliver and keep your stories, and maintain your library: performance of the contract.

- Verify your payments and provide the order confirmation: performance of the contract.
- Keep, after purchase, proof of the transaction and of consents, to establish, exercise or defend our rights: our legitimate interest in retaining contractual evidence.
- Meet our accounting and tax obligations: legal obligation.
- Notify you when a story is ready: your consent, revocable at any time.
- Answer your requests and handle reports: our legitimate interest in providing and improving the service.
- Ensure security and prevent fraud and abuse: our legitimate interest in protecting the service and its users.

## NEW ZEALAND PRIVACY INFORMATION

Where the New Zealand Privacy Act 2020 applies, we collect and hold your personal information for the purposes described in this policy, and we handle it in accordance with the information privacy principles. Account information is required to purchase and keep a story, and the required story parameters are needed to generate it; without them we cannot provide the service. Optional fields may be left empty.

The first names of loved ones that you add to a story are collected from you, not from them. We use them only to generate and keep that story, through the service providers listed under "Where and by whom". We have no way of contacting the people you name, so we ask you to tell them — or, for a child, to hold this information for them as parent or guardian — that Escale (Matthieu Deliry, address above) holds their first name for this purpose, and that they can ask us for access to it or to have it corrected at contact@escalestories.com.

You may ask to access the personal information we hold about you, and to have it corrected, by writing to contact@escalestories.com. We answer as soon as we reasonably can, and no later than 20 working days after receiving your request.

## DATA ABOUT YOUR LOVED ONES

A story's parameters may contain a child's or a loved one's first name. We ask you to give only the first name, never a full name, address, contact details or sensitive data. This information is used only to generate and keep your story. The person concerned can exercise their rights (below) with us; where appropriate it is your responsibility to inform them, and if it is a child, to provide this information as the parent or legal guardian.

## WHERE AND BY WHOM

Your data is hosted in the European Union (Supabase database in the Paris region, application servers in Europe). To generate stories, creation parameters are sent to our AI providers, acting as processors: Anthropic (text generation) and Google (narration, review, illustration). Supabase and IONOS (hosting and infrastructure), RevenueCat (technical purchase validation) and Expo (notifications) also act as technical processors, each limited to its function. Apple or Google (payment through the app store (Apple's App Store or Google's Google Play)) and the sign-in providers ("Sign in with Apple", "Sign in with Google") may act as separate controllers for their own services, under their own policies.

## TRANSFERS OUTSIDE THE EUROPEAN UNION

Some providers — notably Anthropic, Google and RevenueCat — may process data in the United States. Depending on the provider and service, these transfers rely either on an applicable adequacy decision or on the European Commission's standard contractual clauses, with additional measures where necessary. You may ask us for information or a copy of the applicable safeguards at contact@escalestories.com. We require our processors to process data only to provide their services to Escale and in accordance with the terms of the business offerings we use.

For users in New Zealand: your personal information is held outside New Zealand — in France and elsewhere in the European Union and, for some providers, in the United States — by service providers acting on our behalf. We remain responsible for it, and we use contractual, organisational and technical measures intended to give it protection comparable to that required under the New Zealand Privacy Act 2020.

## TRACKERS

We use no advertising trackers and run no targeted advertising. Some technical services may use identifiers necessary for purchases, authentication, notifications, security or support to work.

## SECURITY

Data is encrypted in transit, server access is restricted and our offsite backups are encrypted. No system is infallible; should an incident affect your data we would inform you as required by law.

## HOW LONG

We keep your data for the following periods:

- Account and stories: as long as your account exists.
- Notification token: until you withdraw permission or delete your account.
- Consent and transaction proof tied to a purchase: up to five years after the purchase, to defend our rights.
- Support messages: up to three years after our last exchange.
- Reports: up to two years after they are handled.
- Technical and security logs: up to twelve months.
- Documents required by our accounting and tax obligations: up to ten years.
- Backups: local copies are kept for fourteen days; an encrypted offsite copy is kept for disaster recovery and purged by rotation.

## DELETING YOUR ACCOUNT

You can delete a story, or your whole account, at any time in the app (Settings → Delete my account). Deletion erases your account, stories and files from active systems; backups are then purged on their rotation cycle. Some data may be archived separately, with restricted access, where a legal obligation or a dispute justifies it; it is then no longer used to provide the service.

## YOUR RIGHTS

You have the rights of access, rectification, erasure, restriction, objection and portability, the right to withdraw your consent at any time (without affecting processing already carried out), and the right to ask for information about the safeguards for transfers outside the EU. Exercise them at contact@escalestories.com or by post at Escale — Matthieu Deliry, 3 rue de la Sablière, 78220 Viroflay, France; we reply within one month. You may also lodge a complaint with the CNIL (cnil.fr), the supervisory authority of Escale's country of establishment. If you reside in New Zealand, you may also complain to the Office of the Privacy Commissioner (privacy.org.nz).

You may also provide instructions regarding the retention, deletion and disclosure of your personal data after your death. You may send specific instructions concerning your Escale account and stories to contact@escalestories.com. You may designate a person responsible for carrying out those instructions and specify whether your data may be disclosed to that person. You may amend or revoke these instructions at any time.

## CHILDREN

Stories may be intended for children from age 3, but the application, account creation, purchases and parameter entry are reserved for adults. Children may listen to stories under an adult's responsibility.

## CHANGES

We will inform you in the app of any substantial change to this policy. The applicable version is the one published in the app.