

Privacy Policy

1. Data Controller

The controller of personal data processing is:

Althemia – Sole Proprietorship

Trade name: **Palks Studio**

Address: SIRET: SIREN: Intra-community VAT: VAT not applicable (Article 293B of the French General Tax Code)

Contact email: contact@palks-studio.com

2. Scope of Application

This Privacy Policy applies exclusively to **professional (B2B) services** performed by Palks Studio under service agreements.

It does not apply to:

- a public consumer website
 - an open SaaS service
 - a payment platform
 - marketing or advertising activities
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3. Data Processed

Strictly within the scope of service execution, the following data may be processed:

- professional identity of the Client (name, company)
- professional contact details (address, email)
- invoicing data (invoices, amounts, history)
- banking details (IBAN, BIC)
- files provided by the Client (e.g. batch invoicing CSV files)
- technical data required for automation
- technical security logs (e.g., hashed IP address, access traces, secure access tokens)

No data is collected without a direct and necessary link to the contractual service.

4. Purpose of Processing

Data is processed exclusively for the following purposes:

- execution of automation and invoicing services
- generation of accounting documents (invoices, exports)
- administrative and contractual follow-up

- operational communication related to the service

Data is **not sold, not used for commercial purposes,**
and **not used for prospecting or marketing.**

As part of electronic invoicing (Factur-X / EN 16931), the Client remains responsible for the accuracy, completeness, and regulatory compliance of the data provided, including prior to any submission or transmission to a Partner Dematerialization Platform (PDP).

5. Legal Basis for Processing

Data processing is based on:

- the performance of the contract (Article 6.1.b GDPR)
- the Provider's legitimate interest in ensuring service security, abuse prevention, and proper technical operation (Article 6.1.f GDPR)

No processing is carried out without a prior contractual relationship or without technical necessity related to service security.

6. Data Retention Period

Data is retained only for the duration necessary for the execution of the services.

Retention, overwriting, and deletion rules are detailed in a separate document:

Data Retention Policy

The Provider does not perform legal archiving on behalf of the Client.

7. Data Security

The Provider implements appropriate technical and organizational measures, including:

- secure local storage
- restricted access to data
- no public exposure
- automation executed in a controlled environment

Despite these measures, the Provider cannot be held liable for breaches resulting from:

- improper use by the Client
- incorrect data provided by the Client
- external vulnerabilities beyond the Provider's control

Data is hosted within the European Union.

8. Subprocessing

Data may be processed by technical service providers strictly necessary for the operation of the service (including hosting and infrastructure).

Such providers act only on the Provider's instructions and in compliance with confidentiality and security obligations.

No data is sold or used for commercial purposes.

9. Client Rights

In accordance with the GDPR, the Client has the following rights:

- right of access
- right to rectification
- right to erasure (within contractual limits)
- right to restriction of processing

Any request must be submitted in writing to:

contact@palks-studio.com

10. Contact and Complaints

For any questions relating to data protection:

contact@palks-studio.com

In the event of an unresolved dispute, the Client retains the right to contact the competent supervisory authority.
