PicTalk

Record of personal data processing activities

Public version · 9 November 2026 · articles 30.1 and 30.2 of the GDPR

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, user type, language, e-mail text	OneSignal (Netherlands) and its e-mail provider Mailgun; Google Workspace (login service e-mails)	OneSignal: accessed from the United States, e-mails via Mailgun; Google: United States; standard contractual clauses, Data Privacy Framework	Lifetime of the account
Usage statistics and error reports	Legitimate interest (reliability and improvement of the Service)	Users	Usage events (no screen recording), identifier, name, e-mail, user type, goals, language; error traces, device; bug report: first name, e-mail, optional screenshot	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
Location of paired GPS watches	Performance of the contract (feature turned on by the user)	Watch wearers (people supported, including minors); people the location is shared with	Watch serial number, position history (coordinates, altitude, speed, heading, time), geofences and alerts, sharing list; phone position to centre the map	Authorised Pictalk staff; OVHcloud (hosting); people authorised by the user; OpenStreetMap (address search)	None	Positions: 24 hours (deleted every night); watch, geofences and sharing: until they or the account are deleted
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; OneSignal: accessed from the United States, e-mails via Mailgun, standard contractual clauses and 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; location data (GPS watches)	OVHcloud (France, HDS); PostHog (EU); Sentry (Germany); OneSignal (Netherlands, accessed from the United States); RevenueCat; Mistral AI (EU, optional AI features); Google Workspace (login e-mails)	OneSignal and Google: United States, standard contractual clauses and Data Privacy Framework; 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).