Record of processing activities

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Only the French version is binding.

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PURPOSE AND KEEPING OF THE RECORD

This record lists the personal data processing activities carried out by Solyzon, in accordance with Article 30 of Regulation (EU) 2016/679 of 27 April 2016, the General Data Protection Regulation (GDPR). It has two parts: the processing for which Solyzon is the controller, and the categories of processing that Solyzon carries out as a processor, on behalf of its clients.

The record restates the processing described in the Solyzon privacy policy and in the Luminance privacy policy, which set out the details and prevail in the event of any discrepancy. It is updated whenever a processing activity is created or modified.

CONTROLLER

The processing is carried out by Armand OCTEAU, sole trader, SIREN 999 229 016, whose business address is 30 bis boulevard Littré, 78600 Le Mesnil-le-Roi, France, and Sarah LÉVY, sole trader, SIREN 999 229 008, whose business address is 24 avenue du Ponant, 92390 Villeneuve-la-Garenne, France. These sole traders operate together under the trade name Solyzon.

Solyzon has not appointed a data protection officer, which its size and activities do not require, and has no representative outside the European Union. Questions about data are handled by Armand OCTEAU and Sarah LÉVY, at contact@solyzon.com. No processing is carried out with a joint controller.

COMMON SECURITY MEASURES

Unless stated otherwise, the following measures apply to each processing activity in this record:

- data is hosted by Solyzon, on its own servers, in France;
- exchanges are encrypted, and the Cloudflare, Inc. network protects access to the websites and services against attacks;
- access to data is restricted to the team members who need it, and access to the content of an account requires the person's consent, or that of two team members in the event of a court order or a security incident, each access being logged;
- production secrets are kept in an encrypted vault;
- data is replicated across several servers, servers are backed up every night to a separate disk, backup integrity is checked every week, and database exports are encrypted;
- passwords are hashed, authenticator app secrets are encrypted, and the security log only accepts the addition of new lines.

PROCESSING FOR WHICH SOLYZON IS THE CONTROLLER

Technical log of the entry server

- Purpose: diagnose an outage or an attack on the websites and the account.
- Legal basis: legitimate interest of Solyzon in protecting its websites and services.
- Data subjects: website visitors and account users.
- Data: full IP address, requested page, time and browser.
- Recipients: the Solyzon team; Cloudflare, Inc., whose network carries the exchanges.
- Transfers outside the Union: Cloudflare, Inc., in the United States, certified under the EU-U.S. Data Privacy Framework and bound by the Commission's standard contractual clauses.

- Retention period: thirty days.

Contact form

- Purpose: reply to the person who writes to Solyzon.
- Legal basis: steps taken at the person's request.
- Data subjects: people who use the contact form.
- Data: name, email address, message and, at the person's discretion, phone number and details of the request.
- Recipients: the Solyzon team.
- Transfers outside the Union: none.
- Retention period: three years after the last exchange with the person.

Job applications

- Purpose: review an application and reply to it.
- Legal basis: steps taken at the person's request.
- Data subjects: applicants.
- Data: name, email address, profile, field, optional link, message and CV.
- Recipients: the Solyzon team, the only one with access to the CV storage space, after identification.
- Transfers outside the Union: none.
- Retention period: two years after the last exchange, unless the person asks for earlier erasure; the CV stays fourteen days in the storage space, then is kept with the application.

Student offer requests

- Purpose: check the person's eligibility for the student offer and grant it.
- Legal basis: steps taken at the person's request.
- Data subjects: students who request the offer.
- Data: first name, last name, student email address, institution, course, chosen products, proof of enrolment and, for the future entrepreneur pack, the website address and the company's SIREN number.
- Recipients: the Solyzon team; the French State's public business directory, which receives the SIREN number.
- Transfers outside the Union: none.
- Retention period: the duration of the offer, then one year; the proof of enrolment stays fourteen days in the storage space.

Vulnerability reports

- Purpose: handle a vulnerability report, keep its author informed and thank them.
- Legal basis: steps taken at the person's request.
- Data subjects: authors of a report.
- Data: description of the vulnerability and, at the person's discretion, email address.
- Recipients: the Solyzon team.
- Transfers outside the Union: none.
- Retention period: three years after the report is closed.

Spam protection of forms

- Purpose: reject abusive submissions received through the websites' forms and limit their number; from 1 December 2026, train Herse, the Solyzon spam filter, on anonymised messages, except applications and vulnerability reports.

- Legal basis: legitimate interest of Solyzon in protecting its websites.
- Data subjects: people who use the websites' forms.
- Data: form content, attachments, IP address, browser, time spent filling it in and email address; training messages are stripped of the name, email address, phone number, IP address, browser, attachments and any contact details in the text.
- Recipients: none, Herse running on the Solyzon servers.
- Transfers outside the Union: none.
- Retention period: one hour at most for the IP address and email address used to count submissions; three years for the anonymised text of a training message.

Newsletter

- Purpose: send news about Solyzon and its products.
- Legal basis: the person's consent.
- Data subjects: newsletter subscribers.
- Data: email address.
- Recipients: none, emails being sent from the Solyzon servers; Cloudflare, Inc., through Cloudflare Turnstile, to tell a person from a robot when subscribing.
- Transfers outside the Union: Cloudflare, Inc., in the United States, under the conditions described for the technical log.
- Retention period: until unsubscription.

Sol, the websites' assistant

- Purpose: answer questions about the products, services and company, improve these answers and limit abuse.
- Legal basis: legitimate interest of Solyzon in informing its visitors.
- Data subjects: visitors who ask Sol a question.
- Data: question, page where it is asked, language and answer, any email address, phone number, IBAN or card number in a question being masked before it is stored; IP address, to count the day's questions.
- Recipients: none, the language model running on the Solyzon servers; Cloudflare, Inc., through Cloudflare Turnstile.
- Transfers outside the Union: Cloudflare, Inc., in the United States, under the conditions described for the technical log.
- Retention period: six months for the exchanges; two days at most for the IP address.

Audience measurement

- Purpose: measure the websites' audience, with no advertising purpose.
- Legal basis: the person's consent, given in the cookie panel.
- Data subjects: website visitors who consent.
- Data: pages viewed, visit duration, referrer, device and country, the IP address being anonymised before it is stored; `_ga` and `_ga_03CE6BP9C7` cookies.
- Recipients: Google Ireland Limited.
- Transfers outside the Union: Google LLC, in the United States, certified under the EU-U.S. Data Privacy Framework and bound by the Commission's standard contractual clauses.
- Retention period: fourteen months for measurement data; thirteen months for the cookies.

Creation and management of the Solyzon account

- Purpose: create the account, recognise the person, show the screens in their language, send the emails the account requires and, if the person wishes, information emails.

- Legal basis: performance of the requested service, namely the provision of the account; consent for information emails.
- Data subjects: Solyzon account holders.
- Data: first name, last name, email addresses, language, time zone, date of birth and, optionally, postal address, phone number and photo; role in an organisation and the address with which the person joined it.
- Recipients: the Solyzon team, limited to what support needs; Solyzon applications, for the information they need; third-party applications, for what the person accepts; IGN and komoot GmbH, which receive the text typed to suggest a postal address, with no information identifying the person.
- Transfers outside the Union: none, apart from passing through the Cloudflare, Inc. network described for the technical log.
- Retention period: as long as the account exists; a deleted account stays suspended for thirty days, then is deleted, its data disappearing from backups six months later at most.

Account sign-in and security

- Purpose: enable sign-in, protect the account, warn the person of an unusual sign-in, investigate an incident and limit abuse.
- Legal basis: performance of the service for sign-in methods and sessions; legitimate interest of Solyzon in protecting the account and the service for the security log, device checks and abuse limitation.
- Data subjects: Solyzon account holders.
- Data: public keys of passkeys and their names, hashed password, encrypted authenticator app secret, hashed recovery codes; browser, IP address prefix, approximate location and sign-in dates of each device; sessions; security log operations; full IP address to count attempts.
- Recipients: the Solyzon team; Have I Been Pwned, which only receives the beginning of a password hash, which is not personal data.
- Transfers outside the Union: none, apart from passing through the Cloudflare, Inc. network described for the technical log.
- Retention period: one year for the security log; four hundred days after the last sign-in for a device; fourteen days of inactivity, and ninety days at most, for a session; one hour at most for the full IP address.

Proof of acceptance of the terms

- Purpose: establish which version of the terms and privacy policy the person accepted, in the event of a dispute.
- Legal basis: legitimate interest of Solyzon in being able to establish what was accepted.
- Data subjects: Solyzon account holders.
- Data: accepted version and date of acceptance.
- Recipients: the Solyzon team.
- Transfers outside the Union: none.
- Retention period: five years after the account ends.

Orders, invoicing and business relationship

- Purpose: manage orders, quotes and projects, issue invoices, process payment, prevent fraud and manage the business relationship.
- Legal basis: performance of the contract; legal obligation for accounting.
- Data subjects: Solyzon clients and their contacts.

- Data: identification (last name, first name, company name, position), contact details (postal address, email address, phone number), billing data (bank details, payment history) and project data (content supplied, exchanges, files sent).
- Recipients: the Solyzon team; Stripe, for card payment; the competent authorities where required by law.
- Transfers outside the Union: Stripe, Inc., in the United States, certified under the EU-U.S. Data Privacy Framework.
- Retention period: the duration of the contractual relationship, then five years after the contract ends for contractual documents, three years after the business relationship ends for its other data, and ten years for invoices and accounting records, in accordance with Article L. 123-22 of the French Commercial Code.

Luminance, free test

- Purpose: run the free accessibility test of a website and limit abuse.
- Legal basis: legitimate interest of Solyzon in offering a test and protecting its service.
- Data subjects: people who request a test.
- Data: address of the tested website; hash of the IP address; test result, with no screenshot.
- Recipients: Cloudflare, Inc., through Cloudflare Turnstile.
- Transfers outside the Union: Cloudflare, Inc., in the United States, under the conditions described for the technical log.
- Retention period: thirty days for the result and the IP address hash.

Luminance, audits and reports

- Purpose: audit the accessibility of a client's website, have certain criteria judged by an artificial intelligence model and produce the report.
- Legal basis: performance of the contract with the client; legitimate interest of the client and of Solyzon in checking the website's accessibility, for reading personal data displayed on the audited pages.
- Data subjects: members of the client's organisation; people whose data is displayed on the audited public pages.
- Data: page addresses, elements found and status of each criterion; captures cropped to one element, with faces blurred, and text extracts in which email addresses and phone numbers are replaced by a neutral mention.
- Recipients: members of the client's organisation; the Solyzon team, for a validated compliance audit or a support request; Mistral AI, as a processor, on its servers located in the European Union, for the captures and extracts.
- Transfers outside the Union: none, apart from passing through the Cloudflare, Inc. network described for the technical log.
- Retention period: captures deleted at the end of the audit; reports, grids and PDFs as long as the client's account is active, then three years after its last activity.

Luminance, accuracy improvement

- Purpose: measure and improve the accuracy of Luminance audits.
- Legal basis: legitimate interest of Solyzon in making its audits more accurate.
- Data subjects: no identified person, the traces containing no IP address, account or page content; Solyzon auditors whose opinion is kept.
- Data: technical trace of each page analysed and of each model opinion; auditors' opinions; anonymous continuous integration reports, and hash of the sending IP address.
- Recipients: the Solyzon team.

- Transfers outside the Union: none.
- Retention period: thirteen months for traces and reports; thirty-six months for auditors' opinions; two days for the hash of the sending IP address.

Grammage, audits through the website and the API

- Purpose: measure the carbon weight of a page or a website, produce the report and the attestation, apply usage limits and protect the API against abuse.
- Legal basis: performance of the service; legitimate interest of Solyzon in protecting its API.
- Data subjects: users who run an audit from getgrammage.com or through the API.
- Data: address of the measured page, report, IP address and browser user agent of the caller, request log; results sent back by the tool run at the user's premises, only at the user's express request, the domain possibly being replaced by a hash.
- Recipients: the Solyzon team.
- Transfers outside the Union: none, apart from passing through the Cloudflare, Inc. network described for the technical log.
- Retention period: twelve months for the IP address, user agent and request log; thirteen months for the full report; six years for the result and the attestation; the latest result of each website or page is exempt from the first two deletions, so that the badge and the current report remain available.

PROCESSING CARRIED OUT ON BEHALF OF CLIENTS

Solyzon acts as a processor, within the meaning of Article 28 of the GDPR, in the following cases. Its commitments are described on the GDPR page of solyzon.com. The list of clients on whose behalf Solyzon processes data, with their contact details, is kept available to the French data protection authority (CNIL).

Accounts managed by an organisation

- Category of processing: provision of the Solyzon account of an organisation's members, the organisation deciding how they are used.
- Controller: the client organisation.
- Data: as described for the creation and management of the account and for account sign-in and security.
- Other processors: Cloudflare, Inc., to protect access to the account.
- Transfers outside the Union: Cloudflare, Inc., in the United States, under the conditions described for the technical log.

Herse

- Category of processing: in the mode hosted by Solyzon, reading each message received by the client's website and returning its verdict; in all modes, receiving pseudonymised verdict corrections and, if the client enables sharing between clients, spam indicators, as well as the number of requests received in the month; training Herse on the corrections the client's website allows to be shared, after pseudonymisation.
- Controller: the client.
- Data and data subjects: data contained in the messages, generally the identity, contact details and text sent by the client's visitors; spam indicators, namely IP address, hashes of the email address and text, and links without their parameters.

- Retention period: no message is kept, each message being processed in memory for the time needed to return the verdict; twelve months at most after their last write for corrections; seven days for indicators shared between clients.
- Other processors: none.
- Transfers outside the Union: none.

Subscribed services

- Category of processing: hosting, backup, consultation, return and deletion of the data a client records in a service subscribed with Solyzon, and the operations the service describes.
- Controller: the client.
- Data and data subjects: those the client records in the service, in particular its staff, customers, contacts or visitors.
- Other processors: Cloudflare, Inc., to protect access to the services; Mistral AI, for Luminance audits.
- Transfers outside the Union: Cloudflare, Inc., in the United States, under the conditions described for the technical log.



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