

# PRIVACY POLICY

Mobile Application : Mystia

Last updated : June 4, 2025

## 1. Preamble

This privacy policy aims to clearly, precisely, and transparently inform users of the mobile application **Mystia**, published by **Martin DUPONT – Sole Proprietor**, operating under the trade name **Garias Studio**, about the methods of **collection, processing, use, storage, and protection** of their personal data.

The processing of this data is carried out in compliance with **Regulation (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons (GDPR), as well as the amended French Data Protection Act (**Loi Informatique et Libertés**).

### Territorial Scope

This privacy policy applies to all users residing in the European Union and the European Economic Area.

**Mystia** complies with Regulation (EU) 2016/679 (GDPR), which applies to all EU Member States, without prejudice to any specific rights that may exist locally under national law.

### Reference Language

In the event of any discrepancy between a translated version of this privacy policy and its original French version, only the French version shall prevail.

## 2. Data Controller

The data controller is:

**Martin DUPONT – Sole Proprietor**

Trade Name: **Garias Studio**

Address: **10 rue des Apps, 75000 Paris, France**

Contact for any request regarding personal data:

 [support@appfolio.dev](mailto:support@appfolio.dev)

### 3. Data Collected

In the context of using the *Mystia* application, the following categories of data may be collected:

#### **Data collected during account creation:**

- Email address
- Username
- Age
- Gender
- Date of birth
- Marital status
- Occupation
- Place of birth
- How the user discovered the application
- Expectations expressed regarding the service

#### **Data collected during service usage:**

- Questions submitted by the user
- Selected reading themes
- Types of readings chosen
- Results generated by the application
- Summaries generated by artificial intelligence
- Usage statistics (for service improvement purposes)

**Important Note:** Although *Mystia* does not intentionally collect sensitive data as defined in Article 9 of the GDPR (e.g., health, spiritual orientation, etc.), the user is informed that certain freely entered information (particularly within submitted questions) may indirectly reveal such data. These elements are not subject to any targeted processing.

## 4. Purposes of Data Processing

The data processing is carried out for the following purposes:

- Creation, management, and maintenance of the user account
- Provision of AI-assisted cartomancy services
- Optimization of the user experience
- Conducting internal statistical analyses (e.g., frequently discussed topics)
- Handling support and assistance requests
- Compliance with legal and regulatory obligations

**No marketing or newsletter communications are sent** without the user's prior explicit consent.

## 5. Legal Basis for Processing

The aforementioned data processing activities are based on the following legal grounds:

- **Consent** of the data subject (e.g., account creation, processing of optional data)
- **Performance of a contract** (e.g., access to and use of the application)
- **Legitimate interest** of the data controller (e.g., service improvement, internal analysis)
- **Compliance with legal obligations** (e.g., security, data retention)

## 6. Recipients and Subcontracting

Personal data is accessible only to:

- Authorized members of **Garias Studio** staff, within the scope of their duties
- Technical subcontractors listed below, acting under documented instructions:

### List of subcontractors:

- **Firebase (Google LLC)** – Storage infrastructure and database
- **OpenAI** – Automated response generation via AI (Europe-West1 region – Ireland)
- **Google Analytics** – Audience and application usage measurement
- **OVH SAS** – Hosting of the promotional website *mystia.eu*

All subcontractors are bound by a **contract compliant with Article 28 of the GDPR** and are committed to ensuring the confidentiality, security, and non-reuse of the processed data.

No data transfers outside the European Union are carried out without appropriate safeguards.

## 7. Data Retention Periods

Data is retained only for the periods strictly necessary for the purposes described above:

Data Category	Retention Period
User account data	Until voluntary account deletion
Activity-related data (readings, summaries, etc.)	3 years after last activity
Support/assistance request data	3 years after the request is closed
Aggregated and anonymized statistical data	Up to 5 years

Account deletion results in the irreversible erasure of all associated data. The date and time of deletion may be retained for evidence or GDPR compliance purposes.

## 8. Rights of Data Subjects

In accordance with Articles 15 to 22 of the GDPR, users have the following rights:

- Right of access to their data
- Right to rectify inaccurate data
- Right to object to processing in certain cases
- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to data portability

**Consent** may be **withdrawn** at any time, without retroactive effect on the lawfulness of processing carried out before withdrawal.

These rights can be exercised by submitting a request to:

 [support@appfolio.dev](mailto:support@appfolio.dev)

In the event of a persistent disagreement, users have the right to lodge a complaint with the **CNIL** ([www.cnil.fr](http://www.cnil.fr)).

In accordance with the one-stop-shop mechanism provided for under the GDPR, the **Commission Nationale de l’Informatique et des Libertés (CNIL)** is the competent supervisory authority for the processing of personal data carried out by *Garias Studio* within the European Union. However, users may also exercise their rights with the data protection authority in their country of residence.

## 9. Data Security

The data controller implements appropriate technical and **organizational measures** to ensure a level of security **appropriate** to the risks, in accordance with Article 32 of the GDPR.

These measures include, in particular:

- Secure user authentication
- Hosting on protected infrastructure
- Encryption of data in transit

## 10. Processing of Minors' Data

The *Mystia* application is strictly reserved for individuals aged 16 and over.

No intentional collection of personal data from minors under the age of 16 is carried out.

## 11. AI-Generated Content

The content provided by the AI (summaries or analyses) is **purely informational and for entertainment purposes only**.

Under no circumstances should it be **considered professional, medical, psychological, or legal advice**.

**Garias Studio** disclaims all liability for any decisions made or interpretations drawn based on AI-generated content.

## 12. Changes to the Policy

This privacy policy may be modified at any time, particularly in response to regulatory, legal, or functional developments.

In the event of a substantial change, users will be informed through the application.