

# Privacy Policy

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Effective as of 01/09/2025

## Article 1 — Data Controller

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Cédric Legrand, acting as the publisher of the application "My Wine Cellar", is the controller of your personal data. It attaches great importance to the secure, transparent, and confidential collection and processing of your data, in accordance with Regulation (EU) 2016/679 (GDPR).

You can contact him at the following address: [info@macaveavins.app](mailto:info@macaveavins.app).

## Article 2 — Data Collected and Purposes

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We only collect data strictly necessary for the provision and improvement of our services:

- **Identification data:** Your email address is required to create and secure your account.
- **Content data:** You can add information about your wines, including photographs of labels, which are essential to the main service of the Application.
- **Transaction data:** Information relating to Premium subscriptions is processed securely by the Apple App Store and the Google Play Store, and we do not have direct access to it.
- **Technical data:** We collect anonymized information about your device and your version of the application to ensure the maintenance and improvement of the service.

The processing of this data is based on the performance of the contract that binds us (provision of the service). No automated processing or profiling is performed.

## Article 3 — Data Sharing and Transfers

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We do not sell or rent your personal data. They may be shared with subcontractors for specific technical needs:

- **AI service providers (OpenAI, Google):** Photographs of labels are sent for analysis to extract information about the wine. These transfers are secure and the providers are subject to the GDPR.
- **Hosting services (Firebase):** Your data is stored on secure servers located within the European Union.

No transfer of personal data is made outside the European Union or to countries that do not offer an adequate level of protection.

## Article 4 — Retention Period

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Your personal data is kept as long as your account is active. In case of prolonged inactivity for a period of five years, your data will be deleted. You can also request the deletion of your data at any time via the Application settings.

## **Article 5 — Your Rights**

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In accordance with the GDPR, you have the right to access, rectify, erase, limit the processing, and port your data. To exercise these rights, contact us at [info@macaveavins.app](mailto:info@macaveavins.app).

In the event of a dispute, you have the right to lodge a complaint with the Data Protection Authority in Belgium.

## **Article 6 — Security**

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We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including encryption and pseudonymization where possible.

## **Article 7 — Modifications**

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This privacy policy may be updated. The User will be informed of the changes and must accept them to continue using the Application.