

# Privacy Policy

Version dated 2026-04-25 · ALK Innovations · Trupeo

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## For normal people

In short: we don't sell your data. Ever. Not to advertisers, not to data brokers, and certainly not to AI. Your email content is encrypted (AES-256) and we don't touch it. We don't train any artificial intelligence models on your exchanges.

We host your data in France, on Microsoft Azure infrastructure (France Central region). Your attachments are stored encrypted at Cloudflare R2 within the European Union. It's your content, it stays with you, under your control.

You are free to leave whenever you want. You can export your data and delete your account in a few clicks from your interface. Once the account is deleted, your data disappears immediately from our active servers and is permanently purged from our backups within 30 days maximum.

For any questions regarding your data, you can contact us via the form at [/contact/](#) or write to us by post at ALK Innovations, 31 avenue des Korrigans, 44300 Nantes, France.

If you want the precise version that nobody ever reads in full — it's just below.

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## For non-normal people (lawyers, DPOs, CISOs, curious readers)

### Table of contents

1. Data Controller
2. Data we process
3. Purposes and legal bases
4. Retention periods
5. Subprocessors and recipients
6. Transfers outside the European Union
7. Your rights
8. Data security
9. Cookies and trackers

- 10. Data relating to minors
- 11. Future developments (Artificial Intelligence)
- 12. Changes to this policy
- 13. Contact and complaints

## 1. Data Controller

The data controller is **ALK Innovations**, a SASU with a capital of €1,000, registered with the Nantes RCS under number 983 856 642, whose registered office is located at 31 avenue des Korrigans, 44300 Nantes, France (hereinafter "ALK Innovations" or "we").

ALK Innovations publishes the **Trupeo** service (hereinafter "the Service"), a shared inbox intended for professionals.

The legal representative and publication director is Quentin Georget, President of ALK Innovations. He is also the point of contact for any questions relating to the protection of personal data.

## 2. Data we process

We collect and process the following categories of data:

- **User account data:** first name, last name, professional email address.
- **Connected mailbox data:** email address of the synced mailbox, OAuth access tokens (encrypted) or IMAP password (encrypted, only as a fallback).
- **Message content:** subject, message body, senders, recipients (To, Cc, Bcc), attachments, labels, and folders. All of this data is encrypted at rest using the AES-256 algorithm.
- **Billing data:** name, billing address, VAT number, transaction history. Credit card data is processed directly by our provider Stripe; ALK Innovations does not store any payment data.
- **Technical logs:** IP address (for security and incident detection), connection timestamps.

## 3. Purposes and legal bases

Purpose	Legal basis
Provision and management of the Trupeo Service	Performance of the contract
Management of billing and accounting	Legal obligation
Service security and fraud detection	Legitimate interest
Customer support and response to requests	Performance of the contract

Site audience measurement (Google Analytics 4, Microsoft Clarity)	Consent (Article 6-1-a GDPR + Article 82 French Data Protection Act)
Commercial prospection and marketing tools (no tool currently active)	Consent (Article 6-1-a GDPR + Article 82 French Data Protection Act)

#### 4. Retention periods

- **Active account:** data is kept for the entire duration of the contractual relationship.
- **After account deletion:** deletion is immediate on production servers. Full purge of backups occurs within 30 days maximum.
- **Billing data:** kept for 10 years under accounting obligations (French Commercial Code).
- **Security logs:** kept for the minimum duration required by law or necessary for incident management.

#### 5. Subprocessors and recipients

Subprocessor	Role	Country	Guarantees
Microsoft Azure (Microsoft France SAS)	Server and database hosting	France	Local hosting (France Central)
Cloudflare R2	Encrypted attachment storage	European Union	Local storage (EU)
Cloudflare, Inc.	Anti-spam protection on public forms (Turnstile)	USA	Strictly necessary (Art. 82 French Data Protection Act) – no tracking cookie, DPF certified
Gandi	DNS and domain name	France	French provider
Google LLC	Gmail synchronization (OAuth)	USA	DPF Certified
Microsoft Corporation	Outlook/365 synchronization (OAuth)	USA	DPF Certified
Google LLC	Google Tag Manager and Google Analytics 4 (audience measurement)	USA	DPF Certified – consent required

Microsoft Corporation	Microsoft Clarity (audience measurement and heatmaps)	USA	DPF Certified — consent required
Stripe, Inc.	Payment processing	Ireland / USA	DPF Certified
Resend, Inc.	Transactional emails	USA	DPF Certified
GitHub, Inc.	Source code hosting and CI/CD	USA	DPF Certified

## 6. Transfers outside the European Union

Transfers of personal data to our subprocessors based in the United States are carried out in accordance with the GDPR. They rely primarily on the certification of our subprocessors under the EU-US Data Privacy Framework (DPF). In addition, and in the event of invalidation of the DPF, we have implemented the Standard Contractual Clauses (SCCs) adopted by the European Commission (Decision 2021/914/EU) as an alternative transfer mechanism.

## 7. Your rights

In accordance with the GDPR, you have the following rights: access, rectification, erasure, portability, restriction of processing, objection, withdrawal of consent, and definition of directives after death.

You can exercise these rights via the contact form at [/contact/](#) (by selecting "GDPR Request"). We will respond to your request within a maximum of 30 days. You also have the right to lodge a complaint with the CNIL (<https://www.cnil.fr>).

## 8. Data security

We implement rigorous technical and organizational measures:

- TLS 1.2+ encryption for all flows in transit.
- AES-256 encryption at rest for message bodies and attachments.
- Encryption key derivation per workspace.
- Hosting in France (Azure France Central).
- Daily encrypted backups.
- Notification of data breaches within 72 hours to the CNIL and affected users in case of high risk.

## 9. Cookies and trackers

In line with CNIL recommendations, no non-essential cookie is dropped until you explicitly give your consent via the banner shown on your first visit.

### Strictly necessary cookies (no consent required)

We use your browser's local storage ( `localStorage` ) to remember your language preference and the choice you make in the consent banner. This information stays on your device and is never transmitted to third-party servers.

On pages that contain a public form (contact form, waitlist signup), we load **Cloudflare Turnstile** (Cloudflare, Inc.) to protect those forms from automated abuse (bots, spam). Turnstile is a privacy-friendly bot challenge that does not set a tracking cookie and does not profile the user; it is loaded automatically without prior consent under the "strictly necessary for the service requested by the user" exemption (Article 82 of the French Data Protection Act). Turnstile may set a short-lived technical cookie `cf_clearance` only when a challenge is solved, for rate-limiting purposes.

### Audience measurement cookies (consent required)

If you accept the "Audience measurement" category, we use:

- **Google Analytics 4** (Google LLC) to measure anonymized site traffic (pages viewed, traffic source, device type). IP address anonymization is enabled. Data is retained for a maximum of **14 months** in GA4 (Data Retention setting), then automatically deleted. Cookies dropped: `_ga` , `_ga_<ID>` (maximum lifetime 13 months).
- **Microsoft Clarity** (Microsoft Corporation) to view aggregated heatmaps and interaction recordings that help us improve the site's ergonomics. Sensitive fields (emails, passwords, payment card numbers) are automatically masked by Clarity. Clarity sessions are retained for **1 year** by default. Cookies dropped: `_clck` , `_clsk` , `CLID` (maximum lifetime 1 year).

These tools are loaded via **Google Tag Manager** (Google LLC) in "Consent Mode v2" with a default-denied posture.

Until you give your consent:

- **No audience-measurement cookie is dropped** on your device ( `_ga` , `_ga_<ID>` , `_clck` , `_clsk` , `CLID` remain absent).
- **Microsoft Clarity** is not loaded at all — no network request is made to its servers.
- **Google Analytics 4** may emit what Google calls "cookieless pings" to Google servers. According to [Google's documentation](#), these pings contain no cookie, no persistent identifier and no personally identifiable data; they feed only aggregated statistical modeling. The Consent Mode v2 parameter `ads_data_redaction` is enabled to redact fields that could contain advertising identifiers; `url_passthrough` is intentionally left disabled so that click IDs do not propagate through navigation URLs. The CNIL has not formally endorsed this mode: if you require a strict block on any request to Google before consent, we

can switch the site to "strict mode" (the GTM container only loads after acceptance) — contact us to enable this option.

When you accept the "Audience measurement" category, GA4 and Clarity switch to full mode: cookies dropped, detailed events transmitted, as described above.

### **Marketing cookies (consent required)**

Today, Trupeo drops no marketing or advertising cookie. This category is provided for future tools; it is denied by default and never activates without your explicit action.

### **Managing and withdrawing your consent**

You can modify or withdraw your consent at any time via the "Cookie preferences" link in the footer. Your choice is remembered for up to 13 months; beyond that, the banner will be shown again, in line with CNIL guidance.

## **10. Data relating to minors**

Trupeo is a B2B service. In the context of the use of the Service by our Clients (notably educational institutions), ALK Innovations acts as a processor (Article 28 of the GDPR) and the Client acts as a controller.

The Client (Data Controller) warrants that it has the appropriate legal basis (including, where applicable, parental consent or the performance of a task in the public interest) for the processing of all personal data it imports or processes via the Service, including data concerning minors under fifteen (15) years of age. The Client undertakes to obtain and maintain, prior to any use of the Service, the authorization or consent required from the holders of parental authority for minors under 15, in accordance with Article 8 of the GDPR and current French legislation. Trupeo (Processor) declines all responsibility for the validity of the legal basis chosen by the Client.

## **11. Future developments (Artificial Intelligence)**

We plan to introduce artificial intelligence features (e.g., automatic email attribution). These features will be strictly optional (opt-in) and will be subject to prior information. We undertake not to train AI models on your data and not to share your content with AI providers without your explicit agreement.

## **12. Changes to this policy**

We may update this policy. In the event of a substantial change, we will inform you 30 days in advance. Continued use of the Service after the changes take effect constitutes acceptance.

## **13. Contact and complaints**

For any questions, use the form at [/contact/](#) or write to us at: ALK Innovations, 31 avenue des Korrigans, 44300 Nantes, France.

*This English version is provided for convenience. In case of any inconsistency, the French version prevails.*