LEGAL DOCUMENT

Privacy Policy

Version dated 2026-10-28 · ALK Innovations · Trupeo

In short

We don't sell your data. Ever. Not to advertisers, and not to AI services. Your emails are protected when stored. We only process them to provide the service, and we do not train AI models on them.

We host your data in France, messages and attachments included. It's your content, it stays with you, under your control.

If you connect an assistant such as Claude or ChatGPT to your account yourself, it reads and does in Trupeo what you ask it to, with your rights, and you can remove that access at any time (see section 12).

You are free to leave whenever you want. You can delete your account in a few clicks from your interface, and export your data from it as well: your own account data, and, if you own a shared mailbox, that mailbox's data (see section 8). Once the account is deleted, your data is erased from our active servers, and the database backups that still contain it expire within 35 days maximum. One category falls outside that automatic purge today: it is named in section 4, and you can ask us to erase it.

For any questions regarding your data, you can contact us via the form at https://www.trupeo.com/contact/ or write to us by post at ALK Innovations, 31 avenue des Korrigans, 44300 Nantes, France.

The detailed version is available below.

Detailed version

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1. Who is responsible for data

The company responsible for data 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, the email signature you write and any logo you upload for it, and the preferences stored with your account, such as language, time zone, profile picture, the view your inbox opens on, whether notifications are turned on for your devices and your choice to stop receiving our reminder emails.
- **Connected mailbox data**: email address of the synced mailbox and protected technical information needed to connect that mailbox to Trupeo.
- **Message content**: subject, message body, senders, recipients, attachments, labels, and folders. This data is protected when stored.
- **Shared address book and internal notes**: Trupeo builds a directory of the addresses that appear in each mailbox's mail by itself. It is filled automatically from the From, To and Cc fields of every message received or sent, and holds the address, the name read off the message header, the number of exchanges, the date of the first and of the last, and an automatic ranking according to whether your team has already written to that address. Your team can complete each entry with a name, company, job title, phone numbers and a note, and write

internal notes on a conversation. This is data about third parties, visible to the members of the shared mailbox it belongs to. It is never sent to the person you correspond with.

- **Contacts kept the same as Google Contacts or Outlook**: when a Gmail or Outlook mailbox is connected, Trupeo also asks for access to that account's contacts, on the same Google or Microsoft consent screen: `contacts` on Google, `Contacts.ReadWrite` and `MailboxSettings.ReadWrite` on Microsoft, since a contact group is an Outlook category there. From then on, Trupeo reads and writes that account's contacts through Google's People API or Microsoft Graph. On Google, this permission can be refused and the mailbox connects anyway. For a mailbox connected before Trupeo asked for it at connection, the owner of the mailbox is invited to allow it. Such a mailbox is also asked for it the next time it is reconnected, by its owner or by a member, unless its owner stopped keeping its contacts up to date or turned the invitation down. The owner can stop it at any time in the mailbox's settings: Trupeo then stops all reading and writing of the contacts, and a later reconnection of the mailbox does not turn it back on. Contacts are not kept the same for an Outlook address that is shared with or delegated to another Microsoft 365 account. For each contact, Trupeo exchanges the name, email addresses, phone numbers, company, job title and note, and the contact's labels (Google) or categories (Outlook), which become contact groups in Trupeo. A contact with no email address is not brought into Trupeo. To keep both sides the same, Trupeo also stores, for each contact and each group, the identifier Google or Microsoft gives it and the values both sides last agreed on. Contacts brought in this way are visible to the members of the shared mailbox, like every entry of its address book.
- **Billing data**: name, billing address and billing country, VAT number or other tax identification number, transaction history. Credit card data is processed directly by our provider Stripe; ALK Innovations does not store any payment data.
- **Location data for tax purposes**: the IP address your connection comes from when connecting a mailbox starts a free trial and creates your customer record at Stripe, and the billing country you confirm when you add a payment method.
- **Reduced-rate supporting document**: if you request the reduced rate reserved for associations and schools, the document you upload (PDF, JPEG or PNG) is stored and read by ALK Innovations to assess the request. That document comes from your organisation and may contain data about third parties.
- **Notifications on your device**: if you turn on browser notifications, Trupeo stores the subscription your browser hands it for that device: the technical address issued by that browser's notification service, the keys used to encrypt the content of the notifications, and the identification string that browser sends, which gives its name and version and those of your operating system.
- **Connected assistants**: if you connect an assistant such as Claude or ChatGPT to your account (see section 12), Trupeo records the assistant's application as it presents itself (its name, its address and the return addresses it declares), your authorisation (which assistant, the permissions granted and their dates) and the access tokens issued to it, as well as, to limit abuse, the number of requests the assistant makes for your account.

- **Messages you send us**: the site's contact form sends the category you pick, your name, your email address, the organisation you give if any, the language of the page, your IP address and the message you write; these are posted to the team's chat space (see section 5). The help form in the app sends the category you pick and your message, together with your name, your email address, your account identifier, the language the app is shown to you in, the screen you are writing from, the version of the app and your browser's identification string; if you are writing from one of your mailboxes, it also sends that mailbox's address, its identifier, its provider, its status and the status of its subscription. That request is delivered by email to our support inbox (see section 5), and a shorter copy, carrying the category, your email address, the screen and your message, is then posted to the team's chat space.
- **Data export requests**: when you ask to export your data from your interface (see section 8), Trupeo records the request: what it covered, when it was made, when the file was ready, when it was downloaded, and the IP address the request came from. That record is what lets us tell you, and show an assessor, that an export of your data took place.
- **Ideas and feedback**: what you send us from the "Ideas" page of the app (see section 13): the kind of message you pick (an idea, a problem or what you like), your message and the images you join to it, the language the app is shown to you in, the screen you send it from and the answer the Trupeo team sends you; the ideas you follow; and your contributions to an idea's discussion, with the images joined to them and their state (waiting for review, published or taken down).
- **How you arrived at Trupeo**: when you sign up from a link on trupeo.com, that link tells us the campaign it belongs to when it has one (its source, medium and name), the site you came from (its address only, such as www.google.com, never the page), and the page of trupeo.com and the button you used. If you accepted audience measurement on trupeo.com, it also tells us the first page you saw there, the site you came from that time and that visit's campaign (see section 10). This is recorded with your account when the account is created, together with the channel we deduce from it: an invitation, an advertisement, an email, a social network, a community, another site, a search engine or a direct visit.
- **How you use the service**: the actions you take in Trupeo, such as applying a label or merging two contacts, recorded as technical identifiers, with whether you took them in the app or through an assistant you connected; and, if you accept audience measurement, how the app's screens are used. Sections 3 and 10 describe both.
- **Technical logs**: IP address (for security and incident detection), connection timestamps, and the browser identification string kept with each open session, which the "Security" page of your account shows you so that you can recognise your signed-in devices.

What your time zone is used for. Trupeo sends its daily notifications (the alerts that someone has been waiting too long for a reply or that there is a problem with your account, and the morning summary) in the morning in your time zone. It is detected from your browser when you open Trupeo and your account does not have one yet, and you can change it at any time in your profile. As long as no time zone is recorded for your account, these notifications follow Paris time.

How your billing country is determined. The tax on an invoice depends on where the customer is located. When connecting a mailbox starts a free trial and creates your customer record at Stripe, we send Stripe the IP address that connection comes from, and Stripe uses it to estimate your country. Stripe keeps it on your customer record; Trupeo keeps no copy of it for this purpose. If Stripe cannot locate that IP address, your billing country is set to France until you change it. When you add a payment method, we ask you to confirm your billing country and send the country you choose to Stripe. In the United States, Puerto Rico, Canada and India we also ask you for a postal code and send it to Stripe, because in those countries the country on its own is not enough for Stripe to place you. Stripe calculates the tax on your invoices from your billing address when it has one, otherwise from the billing details of your payment method, and otherwise from the IP address. We also send Stripe the language of your Trupeo account, so that the billing documents and messages Stripe produces for you are in that language.

3. Purposes and legal bases

Purpose	Legal basis
Provision and management of the Trupeo Service	Performance of the contract
Letting an assistant you connected act in Trupeo at your request (section 12)	Performance of the contract
Management of billing and accounting	Legal obligation
Determining where you are located for tax purposes and calculating the tax on your invoices (IP address when your customer record is created at Stripe, billing country)	Legal obligation
Service security and fraud detection	Legitimate interest
Customer support and response to requests	Performance of the contract
Answering a request to exercise your rights, including the exports available from your interface (record of the request and of the IP address it came from)	Legal obligation
Replying to a message from someone who is not a customer, sent through the site's contact form (which needs no Trupeo account) or through the help form in the app (which needs an account, but not a subscription)	Legitimate interest
Site and app audience measurement (Google Analytics 4)	Consent (Article 6-1-a GDPR + Article 82

	French Data Protection Act)
Demographic statistics and cross-device tracking (Google Signals)	Consent (Article 6-1-a GDPR + Article 82 French Data Protection Act)
Measuring product use from the actions the service already records (PostHog)	Legitimate interest (Article 6(1)(f) GDPR)
Session recording on the public site and on the account-creation and mailbox-connection screens (PostHog)	Consent (Article 6(1)(a) GDPR + Article 82 French Data Protection Act)
Measuring how the app's screens are used, inside a mailbox included: which view, panel, button, menu or shortcut was used, never what it was used on (PostHog)	Consent (Article 6(1)(a) GDPR + Article 82 French Data Protection Act)
Customer relationship management and prospecting: your account, how you arrived at Trupeo, your mailboxes, their subscription and, for an organisation, its legal name, VAT number and billing country are copied into the ALK Innovations group's CRM, which we host ourselves on Microsoft Azure in France. You can object to it (section 8)	Legitimate interest (Article 6(1)(f) GDPR)
Measuring which of our content and prospecting bring sign-ups, from how you arrived at Trupeo (section 2)	Legitimate interest (Article 6(1)(f) GDPR)
Reading what you send us from the "Ideas" page, answering you, telling you what becomes of the ideas you follow, and publishing in the app, once reviewed, your contributions to an idea's discussion, with their images, which trupeo.com shows too, to improve the Service (section 13)	Legitimate interest (Article 6(1)(f) GDPR)

4. Retention periods

- **Active account**: data is kept for the entire duration of the contractual relationship.
- **Mailbox paused after its trial**: when a trial ends without a payment method, the mailbox is paused and its data is kept for 14 days after the end of the trial, then deleted: its conversations, notes, contacts and settings, and the access to the mailbox, as when a mailbox is deleted. Adding a payment method before then keeps everything. Every owner of the mailbox is warned by email first, at least 11 days before the deletion, and the mailbox is never deleted before that email has been sent. The account itself is kept.

- **After account deletion**: erasure is immediate on production servers, and the database backups that still contain your data expire within 35 days maximum. One category is not covered by that automatic purge, and you can ask us to erase it through the contact form (see section 8): the reduced-rate supporting document, below.
- **Data already sent to measurement and analytics providers**: account deletion does not, on its own, remove data already sent to Google Analytics 4. Google keeps what it already received under its own retention terms, described in section 5. PostHog is different: because its copy was identified by your Trupeo account identifier, deleting your account also deletes the corresponding PostHog profile, and with it the link between that identifier and the profile. This is true however the account is deleted, including when we act on an erasure request you send us through the contact form (see section 8). The underlying product-use events (who took on a conversation, when it was handled, whether a reply was sent, which feature was used) remain in PostHog, each still carrying that identifier but no longer attached to any profile, under PostHog's own retention terms.
- **Previous copies in object storage**: deleted automatically, at the latest 60 days after the file was first written.
- **Data export files**: deleted seven days after the export is ready. An export is a concentrated copy of personal data living outside the database, so it is kept only as long as it takes to download it, and asking for a new export of the same scope deletes the previous file at once. Deleting your account deletes the export files it left behind before the account itself is removed.
- **Certificate of deletion**: when a shared mailbox is deleted, the email address and the language of each of its owners, and the mailbox's address, are kept only until the email certifying the deletion is sent to them, once the mailbox's stored files are purged. They are then erased; what remains is the date the certificate was sent.
- **The record of a data export request**: kept with your account, the IP address it came from included, and deleted with it. It outlives the file it produced, so that "you exported this mailbox in September" stays answerable after the file is gone.
- **Reduced-rate supporting document**: kept with the reduced-rate request it supports, and not erased automatically with the mailbox or with the account. You can ask us to erase it through the contact form (see section 8).
- **Billing data and location data for tax purposes**: kept for 10 years under accounting obligations (French Commercial Code). The location data for tax purposes (IP address, billing country and, where applicable, postal code) is kept at Stripe, with your customer record and your invoices. Trupeo itself keeps the billing country you entered or confirmed, along with the legal name, type of organisation and VAT number entered in your billing details, for customer relationship management (section 3); it keeps neither your IP address nor your postal code.
- **Contacts kept the same as Google Contacts or Outlook**: a contact stays in the mailbox's address book in Trupeo, and in the Google or Microsoft account, for as long as each side keeps it. Removing a contact on one side removes it on the other: Google Contacts keeps a deleted contact in its trash for 30 days, and Outlook keeps it in its Deleted Items, from where

it can be restored. Turning this off erases the identifiers and agreed values Trupeo stored for it, and leaves the contacts on both sides. Deleting the mailbox erases its address book in Trupeo, never the contacts at Google or Microsoft.

- **Copy in our CRM**: kept for as long as you are a customer. A deleted mailbox, or a mailbox abandoned during setup before it was ever connected, stays there as a former customer for 3 years after its deletion, then is erased with its links to people. Deleting your account erases the record the sync created for you, and the former-customer record of any mailbox that was yours alone; if a record about you already existed in the CRM (because we had been in touch before you signed up), only the information that came from Trupeo is removed from it, and an erasure request addressed to the group goes through the contact form (see section 8). No message content, no subject line, no contact from your mailboxes, no supporting document and no IP address is ever copied there.
- **How you arrived at Trupeo**: kept with your account and deleted with it. It is part of the export of your account's data (section 8).
- **Connected assistants**: your authorisation and an assistant's tokens are kept until you remove its access. Removing it, from the "Assistants" page of your account, deletes the authorisation and revokes its tokens; deleting your account deletes the authorisation and tokens of all your assistants. An access token expires on its own after one hour. The description of an assistant's application is not specific to your account and is kept for as long as the service knows it.
- **Ideas and feedback**: what you sent, the answer you received, the ideas you follow and your contributions, published or not, with the images joined to them, are kept with your account and deleted with it. An image you add and then do not send is deleted after 24 hours. The app does not currently let you delete one of them on its own; you can ask us to erase it through the contact form (see section 8). A published idea is written by the Trupeo team, names no one and stays published after your account is deleted.
- **Security logs**: kept for the minimum duration required by law or necessary for incident management.

5. Service providers and recipients

Service provider	Role	Country	Guarantees
Microsoft Azure (Microsoft France SAS)	Main service hosting	France	Local hosting

Azure Blob Storage	Secure storage of message bodies and attachments; storage of profile pictures, signature logos and reduced-rate supporting documents	France	Local storage (France)
Cloudflare, Inc.	Anti-spam protection on public forms (Turnstile)	USA	Strictly necessary, no tracking cookie
Google LLC (YouTube)	Plays a demo video on the public site, only once you start it	USA	Started by you, GDPR-compliant transfer safeguards
Gandi	DNS and domain name	France	French provider
Google LLC	Secure Gmail connection and, unless it is refused or the mailbox's owner stops it, keeping its contacts the same as Google Contacts	USA	GDPR-compliant transfer safeguards
Microsoft Corporation	Secure Outlook/365 connection and, unless the mailbox's owner stops it, keeping its contacts the same as Outlook	USA	GDPR-compliant transfer safeguards
Google LLC	Google Tag Manager and Google Analytics 4 (audience measurement), on the public site and in the app once signed in	USA	Consent required and GDPR safeguards
Google LLC	Google Signals, through Google's advertising infrastructure (doubleclick.net): demographic statistics and cross-device tracking	USA	"Marketing" consent required and GDPR safeguards
Stripe, Inc.	Payment processing, invoicing and tax calculation	Ireland / USA	GDPR-compliant transfer safeguards
Amazon Web Services EMEA SARL (Amazon SES)	Emails sent by Trupeo (account verification, invitations, notifications, reminders, the requests sent through the help form in the app, and the messages sent through the site's contact form). A notification email may carry a conversation's subject and the	Ireland	Sent from the Ireland region, in the European Union; standard contractual clauses

	sender's name, never the message body		
Google LLC (Google Workspace)	Trupeo's support and contact inboxes: they receive by email the requests sent through the help form in the app, with the items described in section 2, and the messages sent through the site's contact form (category, name, email address, organisation, language of the page, IP address and message)	USA	GDPR-compliant transfer safeguards
Google LLC	Google Chat: the team's chat space receives the messages sent through the site's contact form (category, name, email address, organisation, language of the page, IP address and message) and through the help form in the app (category, email address, screen and message)	USA	GDPR-compliant transfer safeguards
Your browser's notification service (Google, Mozilla, Apple or Microsoft, depending on the browser)	Delivering notifications to your device when you have turned them on	Depends on the browser vendor, most often outside the European Union	The notification's content is encrypted end to end: the service delivers it without being able to read it
GitHub, Inc.	Source code hosting and technical automation	USA	GDPR-compliant transfer safeguards
PostHog, Inc.	Measuring product use: the actions performed in Trupeo (taking on a conversation, handling it, sending a reply, using a feature such as a label, a template or a contact group), in the app or through a connected assistant, are sent as technical identifiers, with no name, no email address and no message content. With consent, how the app's screens are used, and session recording on the public site and on the	USA, data hosted in Germany	Data Privacy Framework and standard contractual clauses; data residency in the European Union

	screens preceding a mailbox, never inside one: see section 10		

6. Google user data (Limited Use)

When you connect a Gmail mailbox to Trupeo, Trupeo accesses that mailbox through the Gmail API, with the permission you grant on the Google consent screen. For the mail itself, Trupeo requests a single Gmail permission, `gmail.modify`, which lets it display your messages and apply to Gmail the actions you perform in Trupeo. Trupeo never permanently deletes your Gmail messages.

On the same consent screen, Trupeo also asks for a second permission, `contacts`, to keep the mailbox's contacts the same as Google Contacts. Google shows it as a box of its own: it can be left unticked, and the mailbox connects anyway. For a mailbox connected before Trupeo asked for it at connection, the owner of the mailbox is invited to allow it. Such a mailbox is also asked for it the next time it is reconnected, by its owner or by a member, unless its owner stopped keeping its contacts up to date or turned the invitation down. This permission lets Trupeo read the account's contacts and contact labels through the People API, and create, change and delete them there when your team does so in Trupeo. A contact Trupeo deletes goes to the Google Contacts trash, from where it can be restored for 30 days.

Trupeo's use and transfer of information received from Google APIs to any other app adheres to the Google API Services User Data Policy, including the Limited Use requirements.

In practice:

- We use Gmail data only to provide the shared inbox features you see in Trupeo: displaying, assigning, and answering your messages, and reflecting in Gmail the actions you perform in Trupeo (read/unread, archive, trash, spam).
- We use Google Contacts data only to keep the mailbox's shared address book and its contact groups the same as the Google account's contacts and labels, both ways, so that your team can find those contacts and write to them and to their groups from Trupeo.
- We do not sell Gmail or Google Contacts data, and we do not transfer it to third parties, except to the service providers strictly necessary to operate the Service (listed in section 5), to an assistant you connected and authorised yourself, only what it asks for on your behalf (section 12), to comply with applicable law, or as part of a merger or acquisition, subject to your prior consent.
- We do not use Gmail or Google Contacts data for advertising purposes of any kind.
- We do not use Gmail or Google Contacts data to develop, improve, or train generalized artificial intelligence or machine learning models.
- No one at ALK Innovations reads the content of your messages or your contacts, except at your explicit request to handle a support request, where necessary for security purposes such as investigating abuse, or to comply with a legal obligation.

- Disconnecting a mailbox from Trupeo deletes the messages and attachments stored for that mailbox, under the conditions described in section 4. The owner of the mailbox can stop keeping the contacts the same as Google Contacts at any time, in the mailbox's settings: Trupeo then stops all reading and writing of the contacts, leaves them as they are on both sides, and does not turn it back on when the mailbox is reconnected; you can also withdraw the permission at any time from your Google Account's third-party access page.

7. Transfers outside the European Union

Transfers of personal data to our service providers based in the United States are carried out in accordance with the GDPR. We rely on safeguards recognized by European regulation and, where necessary, on contractual clauses adopted by the European Commission.

8. 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.

Objecting to customer relationship management and prospecting. You can object at any time to your data being copied into our CRM (Article 21 GDPR), through the contact form. We then take your record out of the CRM, and your links to mailboxes with it; a mailbox whose holder objects is taken out the same way.

Exporting your data from your interface. Two exports are available from your settings, and they cover different things.

- **Your account** (Settings, "Your account" section, "Your data" page), available to anyone with a Trupeo account: your profile, your preferences and your notification settings, your sessions, the record of any Trupeo support access to your account, the internal notes you wrote, what you sent from the "Ideas" page with the answer you received, the ideas you follow and your contributions, including those that were not published, and a dated record of what you did in the shared mailboxes you belong to. That record identifies each conversation and carries neither its subject nor its content: mail in a shared mailbox is shared with the other members and is the mailbox's data rather than any one member's.
- **A shared mailbox** (Settings, "This mailbox" section, "General" page), available to that mailbox's owner: the mailbox and its settings, its members and its invitations, every conversation and message with senders, recipients, subject and dates, the internal notes, the shared address book, the whole activity history, and the list of attachments with their name, type and size. Message bodies and attachment files are included only if the owner ticks "Include the content of the emails and the attachments Trupeo stores": the archive then also carries the bodies Trupeo holds, decrypted, the drafts and the stored attachment files. Trupeo only stores a received message's content from the moment someone opens it, so the body of a message nobody opened in Trupeo is not in it either way: your email provider keeps

the original, and each message carries its identifier at the provider so that you can find it there.

Both produce a file of structured, machine-readable data (newline-delimited JSON, compressed). They are prepared in the background rather than on the spot, and, for your security, they require a recent sign-in: if you have been signed in for more than a day, Trupeo asks you to sign in again first. Once ready, the file stays available for download for seven days and is then deleted; you can ask for a new one at any time. Each request is recorded, with the date and the IP address it came from (see sections 2 and 4).

For anything these two exports do not cover, and to exercise any of the other rights above, you can write to us via the contact form at https://www.trupeo.com/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).

9. Data security

We implement rigorous technical and organizational measures:

- Connections to Trupeo are protected.
- Protection for message bodies and attachments when stored.
- Separation and protection of each customer account space.
- Hosting in France, storage of messages and attachments included.
- Daily protected backups.
- Notification of data breaches within 72 hours to the CNIL and affected users in case of high risk.

10. 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 own storage to remember your language preference and the choice you make in the consent banner. Depending on what you do with Trupeo, those two values may leave your device: here is what happens to each.

Your language. It is also recorded with your Trupeo account, as soon as that account is created: the language of the page you signed up on, and failing that the language your browser asks for, read as English if Trupeo does not support that language. If your browser asks for none, it is recorded the first time you open Trupeo while signed in, in the language shown to you there. You can change it at any time in your profile, and the language of your account is sent to Stripe (see section 2).

Your consent choice, on the billing screen of a mailbox you own. When you open that screen, Trupeo sends its own servers your answer to the "Audience measurement" category only (your choice on the "Marketing" category is not sent) and, when your browser holds one, the Google Analytics identifier kept in the `_ga` cookie, and records both with your customer record. If, and only if, you accepted audience measurement, the first time your subscription becomes active, our servers then send Google Analytics a "purchase" event carrying that identifier, the price of your plan, its currency, the name of the plan and a transaction reference, which is the Stripe identifier of the matching invoice or, failing that, that of the subscription (not the invoice number shown on your documents), so that a subscription can be counted in the site's statistics. If you did not accept audience measurement, or if your browser holds no Google Analytics identifier, no such event is sent to Google.

On the page of the site that contains a public form (the contact form), we use **Cloudflare Turnstile** (Cloudflare, Inc.) to limit automated abuse, such as spam. This service checks that the form is being used normally, without setting an advertising tracking cookie or building a user profile. It may set a short-lived technical cookie only to prevent repeated abuse.

On the site's small business, association and school pages, a demo video first appears as a picture served by Trupeo: nothing is sent to YouTube. If you start it, the **YouTube** player (Google LLC), loaded from youtube-nocookie.com, receives your IP address and technical information about your browser, and may store information on your device. Google handles this data under its own privacy policy.

Audience measurement cookies (consent required)

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

- **Google Analytics 4** (Google LLC) to measure anonymized site and app traffic: pages viewed, traffic source, device type, and the steps of setting Trupeo up. Data is deleted automatically after a maximum of 14 months.
- **PostHog** (PostHog, Inc.) to understand how visitors use the site and the app and where they get stuck, including through the session recording and the measurement of the app's screens described below.
- **Your first visit**, kept by trupeo.com in your browser's storage under `trupeo:first-touch`: the first page you saw, the address of the site you came from (never the page) and that visit's campaign, so that if you sign up later we know what first brought you to Trupeo (section 2). It is written once, never before you accept, kept for 90 days, and deleted as soon as you withdraw your consent. If you accept during a visit, it is the page you arrived on in that visit that is kept, not the one where you accepted.

These tools are used only with your consent, through the consent banner.

Until you give your consent:

- No audience-measurement cookie is set on your device.
- PostHog is not loaded and no recording takes place.

- Google Analytics may receive very limited cookie-free information to produce global statistics. This information does not contain a persistent personal identifier. If you require a strict block on any request to Google before consent, contact us.

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

Session recording (PostHog)

If, and only if, you accept the "Audience measurement" category, PostHog records your navigation so that we can see where people get stuck: the pages visited, mouse movement, clicks and scrolling. It is a replay of what was displayed on screen, not a capture of your screen or your camera.

Where it applies, and where it never does:

- On the public site, on every page.
- In the app, only on the screens that come before a mailbox: creating an account, confirming an address, resetting a password, connecting a mailbox, accepting an invitation.
- **Never inside a mailbox.** Recording stops the moment you enter one. No message subject, no snippet, no correspondent's name and no attachment can therefore appear in it. The same is true of the settings screens, of your account, and of the internal pages reserved for our team.

What a recording does not contain, even where it applies:

- **What you type into a field is masked**, including your name, your email address and your message in the contact form. Password fields always are.
- Neither the app's network exchanges nor your browser's technical messages are attached to the recording.
- Your IP address is anonymised by PostHog before the recording is stored.

Recordings are kept for 30 days and then deleted by PostHog. You can withdraw your consent at any time from the "Manage cookies" link in the footer: recording stops immediately.

Measuring the app's screens (PostHog)

If you accept the "Audience measurement" category, the app also tells PostHog how its screens are used, inside a mailbox included, so that we know which features are used and which are not: which view or panel was opened, whether an action went through a button, a menu, a keyboard shortcut or a swipe, whether a message being written was sent, kept as a draft or discarded, how many results a search returned and which kinds of criteria it combined, the type of device and an approximate window width. Each of these events is taken from a fixed list written into the app: none of them contains what you searched for, a subject, a name, an address, the text of a message or the address of the page. It is not a recording: inside a mailbox, nothing is recorded, as stated above. If you refuse or withdraw your consent, nothing is sent.

Some of this measurement places nothing on your device. Our servers send PostHog the actions the service already records in order to run your shared mailbox: who took a conversation on, when it was handled, whether a reply was sent, which features were used (a label applied, a template inserted, two contacts merged, a notification setting changed, and so on), how many items an action covered, and whether it was taken in the app or through an assistant you connected, named only by its kind (Claude, ChatGPT or another). This is used only to understand how Trupeo is used and to improve it. It contains neither the content of your messages, nor the names or addresses of the people involved, nor the names you give to labels, templates, groups or scopes. Because it places no cookie, it does not depend on the consent banner: it rests on our legitimate interest, and you can object to it at any time through the contact form (section 8).

Marketing cookies (separate consent required)

If, and only if, you accept the "Marketing" category, we turn on **Google Signals** (Google LLC). What that changes in practice:

- If you are signed in to a Google account with ad personalisation enabled, your visits to trupeo.com are linked to that account. Audience measurement stops being anonymised for you.
- We get additional aggregated statistics: age bracket, gender, interests, and tracking of your journey across several devices.
- Data is sent to Google's advertising infrastructure, on the `doubleclick.net` domain, and not only to the audience measurement domains.

What it does not change: **Trupeo runs no advertising, exploits no advertising audience and sells no data.** We use Google Signals for the statistical purpose described above and nothing else.

While you have not accepted this category, Google Signals stays inactive: the `ad_storage`, `ad_user_data` and `ad_personalization` signals are denied by default and advertising identifier redaction (`ads_data_redaction`) is on. You can change this at any time through the "Cookie preferences" link in the footer.

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.

11. Data relating to minors

Trupeo is a service for organizations. When Clients use the Service, including educational institutions, ALK Innovations processes data on behalf of the Client in accordance with Article 28 of the GDPR, under the Data Processing Agreement.

The Client warrants that it has the appropriate legal basis, including where applicable parental consent or a public-interest mission, for the 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, before 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 declines all responsibility for the validity of the legal basis chosen by the Client.

12. Artificial intelligence assistants

Assistants you connect. You can connect an assistant such as Claude (Anthropic) or ChatGPT (OpenAI), or any other assistant that supports the MCP protocol, to your Trupeo account. Nothing happens without you: you add Trupeo in your assistant, then authorise it on a Trupeo screen that states what it will be able to do. The assistant then acts with your account and your rights, no more and no less: it sees the shared mailboxes you are a member of and, in each, the conversations you see. It can read and search conversations, members, labels, scopes and the address book, write, reply to and forward emails in your name, assign, close, annotate, file, trash or mark conversations as spam and as read or unread, manage folders, labels, signatures, the address book, your profile and your notifications and, if you own a mailbox, manage its members, invitations and scopes. It cannot delete a mailbox or your account, touch billing, your password, two-step verification or a mailbox's sign-in credentials, or export your data.

Trupeo sends the assistant only what it asks for, when it asks for it on your behalf. What it receives is processed by the company that runs it, under that company's own responsibility and terms, which you accepted by using it: it is not a service provider of Trupeo, and so does not appear in section 5. Your assistant's settings are where decisions such as how long your conversations with it are kept, or whether they are used to train its models, are made.

You can remove an assistant's access at any time from the "Assistants" page of your account: it ends immediately. To know how assistants are used, what an assistant does through Trupeo is counted with your own actions, marked as done through an assistant and naming only its kind (section 10). What Trupeo keeps about the connection is described in sections 2 and 4.

Trupeo's own AI features. We plan to introduce artificial intelligence features in Trupeo, for example automatic email attribution. These features will always be optional and will be explained before use. We undertake not to train AI models on your data and not to share your content with AI providers without your explicit agreement. Connecting an assistant yourself, as described above, is that agreement, and it applies to that assistant only.

13. Ideas and feedback

The "Ideas" page in the app shows what we are considering for Trupeo and where each idea stands. It is open to anyone with a Trupeo account, owner or member of a mailbox, during the trial and after it.

What you send us. The "Propose an idea" button lets you write to us, in your own words, an idea, a problem or what you like. Your message is recorded with your account, together with the language

the app is shown to you in and the screen you sent it from. You can join up to three images to it, a screenshot for example; a screenshot can show email addresses or names, which you should hide before sending. Each image is re-encoded as soon as you add it, which removes everything it carries besides the picture itself, such as where and when a photo was taken or the device that took it. Your message and its images stay between you and the Trupeo team: a person on the team reads it in our internal tools, where they also see your name, your email address and the shared mailboxes you are a member of, so as to understand your message and answer you. They can answer you privately, attach your message to an idea, or mark it as handled. You find what you sent, its state and our answer under "What I sent". None of it is published without being rewritten by the Trupeo team, and never with your name: a published idea is written by the Trupeo team and names no one.

Ideas you follow. You can follow an idea to be told in Trupeo when its status changes. When your message is attached to an idea, you follow that idea automatically, and you can stop following it at any time. No other user sees who follows an idea.

Your contributions. Under each idea, you can write a contribution to its discussion. A person on the Trupeo team reads it before publishing it; until then, only you and the Trupeo team see it. Once published, it can be read by anyone with a Trupeo account, with your first name. The Trupeo team may decide not to publish it, or to take it down: it is then no longer visible in the app, including to you, but it is still part of the export of your account's data. You can join up to three images to a contribution, re-encoded in the same way. They are published with it, unless the Trupeo team hides one of them, and can then be seen by anyone with a Trupeo account and on trupeo.com (below), without your name. You are told in Trupeo when the Trupeo team answers what you sent, publishes your contribution, or replies in a discussion you took part in.

On trupeo.com. Published ideas also appear on the site, at https://www.trupeo.com/roadmap/, with their title, their description, their status and, where there is one, the Trupeo team's explanation. The site shows no contribution text, no name and nothing you sent us with the "Propose an idea" button. The one thing it shows from a discussion is the images joined to its published contributions that the Trupeo team let through, without saying who sent them.

This processing rests on our legitimate interest in improving the Service and answering you (section 3), and you can object to it through the contact form (section 8). What you sent, the ideas you follow and your contributions, with their images, are hosted with the rest of the Service (section 5), are part of the export of your account's data (section 8) and are deleted with your account (section 4). An image you add and then do not send is deleted after 24 hours.

14. Changes to this policy

We may update this policy. In the event of a substantial change, we will inform you 30 days in advance. An update that only describes more precisely a processing activity already in place takes effect as soon as it is published: what triggers the 30-day notice is a new purpose or a new recipient. Continued use of the Service after the changes take effect constitutes acceptance.

15. Contact and complaints

For any questions, use the form at https://www.trupeo.com/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.