Privacy Policy

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Privacy Policy

Attimo Platform — attimo-gallery.com
Version 3.2 — November 2026

Preamble

The purpose of this Privacy Policy is to inform users of the Attimo platform (hereinafter “the Platform”) of the conditions under which their personal data is collected and processed.

Attimo is committed to respecting the privacy of its users and to processing their personal data in accordance with Regulation (EU) 2016/679 of 27 April 2016 (GDPR) and French Data Protection Act No. 78-17 of 6 January 1978, as amended.

ℹ This policy concerns three categories of persons:

- Professional photographers subscribed to the Attimo platform;
- End clients accessing photographers' galleries (buyers);
- Website visitors and anyone contacting Attimo.

Depending on the category concerned, Attimo's role differs (data controller or data processor).

GDPR standards applied to all users

Regardless of the user's country of residence, Attimo applies European GDPR standards as the highest benchmark for personal data protection. Users located outside the European Union benefit from these standards by contractual extension, in addition to any mandatory rights granted by their local jurisdiction (such as the CCPA in California, PIPEDA in Canada, or the Privacy Act in Australia).

Article 1 — Data controller

The controller of the data collected within the framework of the Attimo Platform is:

- **Name:** Frédéric Gras — trading name: Attimo
- **Legal status:** Sole trader (Entrepreneur individuel under French law)
- **Address:** 38 avenue de Tournaisis, 78990 Élancourt, France
- **SIRET (French business registration number):** 453 606 253 00020
- **General / GDPR email:** info@attimo-gallery.com
- **Technical support email:** support@attimo-gallery.com
- **Phone:** +33 6 51 39 30 80

For any question relating to this policy or the exercise of GDPR rights, you may contact Attimo at info@attimo-gallery.com.

Article 2 — Attimo's dual role under the GDPR

2.1 Attimo as data controller

Attimo acts as data controller for the following data:

- Data of photographers subscribed to the Platform (registration, billing, service usage).
- Data of visitors to the attimo-gallery.com website (contact form, newsletter, statistics).
- Data of persons submitting a request to Attimo's technical support.

2.2 Attimo as data processor

Attimo acts as data processor within the meaning of Article 28 of the GDPR for data collected through the photographic galleries of subscribed photographers. In that case, the data controller is the photographer, who determines the purposes and means of the processing.

The relationship between Attimo and each photographer is formalised through a Data Processing Agreement (DPA) appended to the Terms of Use and Sale. The full table of retention periods applied on that basis is set out in Article 3.4 of that agreement.

Article 3 — Data collected and purposes

3.1 Data of subscribed photographers

Upon registration and use of the Platform, Attimo collects and processes the following data:

Category of data	Purpose	Legal basis	Retention period
Identity and contact details (surname, first name, email, phone, address)	Account creation, contract management	Performance of contract	Contract duration + 3 years
Business data (registration number, VAT number, company name)	Billing, tax compliance	Legal obligation	10 years (accounting obligation)
Login data (credentials, hashed password)	Authentication, security	Performance of contract	Contract duration
Login history and authentication logs	Security, detection of unauthorised access	Legitimate interest	6 months
Billing data (payment method, history)	Billing, accounting	Legal obligation	10 years
Technical usage logs	Service improvement, security	Legitimate interest	6 months
Evidence of acceptance of legal documents	Contractual traceability	Legal obligation	5 years after the end of the contract
Support data (tickets, email exchanges)	User assistance	Performance of contract	Contract duration + 1 year

3.2 Data of Attimo website visitors

Category of data	Purpose	Legal basis	Retention period
Contact form (name, email, message)	Response to enquiries	Consent	2 years after the last exchange
Newsletter subscription (email)	Sending information	Consent	Until unsubscription
Correspondence sent to technical support	Handling of the request	Legitimate interest	Duration of handling + 1 year
Browsing data (cookies)	Statistics, site operation	Consent / Legitimate interest	See Cookie Policy

3.3 Data of gallery end clients

For end clients accessing photographers' galleries, Attimo processes the following data on behalf of the photographer, acting as processor:

Category of data	Purpose	Legal basis	Retention period
Identity and contact details (name, email, phone, delivery address)	Order processing	Performance of contract	Determined by the photographer
Order data (items, payment)	Purchase history, billing	Legal obligation	10 years (accounting obligation)
Electronic signature on the order form (Studio module)	Evidence of commitment	Legitimate interest	10 years, attached to the order
Gallery login data (access code)	Securing access	Performance of contract	Gallery lifespan
Favourites and selections	Gallery and session features	Performance of contract	Gallery or session lifespan
Gallery access logs (IP address, user agent, any email address)	Viewing statistics, security	Legitimate interest	Irreversible anonymisation at 6 months, deletion at 24 months
Vintage photographs entrusted to the Restoration module	Automated repair processing	Performance of contract	30 days after validation by the photographer
Facial template of a club player's identity photo (Sport module)	Recognising the player in the match photos of their team	Explicit consent (Art. 9(2)(a) GDPR)	As long as the player is part of the team; deleted when the authorisation is refused, when the photo is changed or removed, or when the player or the team is removed
Facial templates of persons visible in a club's match photos, position of the faces and jersey numbers read (Sport module)	Finding the authorised players in the match photos without analysing the same photos twice	Explicit consent of the players searched for (Art. 9(2)(a) GDPR); the faces of other persons are never attributed	A maximum of 30 days after the first analysis; deleted immediately when the batch of photos to be sorted is emptied

i For sports galleries using facial recognition (Sport module), biometric data may be processed. Such processing is subject to a specific framework detailed in the Biometric Addendum to the DPA and requires the explicit consent of the persons concerned.

i For a sports club, each player's identity photo is used to recognise them in the match photos of their team. These photos are analysed only once: the templates of the faces they show and the jersey numbers read are kept for a maximum of 30 days after the first analysis, in order to find players added later, and are then deleted from Amazon Web Services and from Attimo. They are deleted immediately when the photographer empties the batch of photos to be sorted. Only players whose authorisation is signed are searched for:

the face of a person who has not given their consent is never attributed to anyone. Withdrawing consent entails the deletion of the template of the player's identity photo.

3.4 Data processed within the referral programme

Within the framework of the referral programme defined in Article 14 of the Terms of Use and Sale, Attimo processes specific data intended for the management of referrals and the prevention of fraud.

Category of data	Purpose	Legal basis	Retention period
Personal referral code, referral statistics (number of referees, badges acquired)	Programme operation, allocation of benefits	Performance of contract	Contract duration
Email address of the Referee upon registration using the Referrer's code	Creation of the referrer-referee link, eligibility verification	Performance of contract	Contract duration + 3 years
IP address, browser user agent, technical identifiers upon registration via a referral code	Fraud prevention (self-referral, fictitious accounts, programme abuse)	Legitimate interest (Art. 6.1.f GDPR)	3 years from collection
Business registration number of the Referee	Anti-fraud verification by cross-checking against registration numbers already recorded	Legitimate interest (Art. 6.1.f GDPR)	3 years from collection
Logs of detected fraud (type, severity level, administrative resolution)	Audit, traceability, defence in the event of a dispute	Legitimate interest (Art. 6.1.f GDPR)	3 years from resolution
Programme ban data (reason, date, administrator issuing the decision)	Preventing the re-creation of an account by a person banned for fraud	Legitimate interest (Art. 6.1.f GDPR)	Contract duration + 5 years

Balancing of interests — Attimo considers that the processing of the above data, based on its legitimate interest, does not unduly infringe the rights and freedoms of the data subjects. The data collected is strictly necessary to prevent fraud liable to cause financial harm to Attimo, its retention period is proportionate, and data subjects may at any time exercise their GDPR rights, including their right to object under Article 21 of the GDPR.

Article 4 — Data recipients

4.1 Internal recipients

The data collected is accessible exclusively to Frédéric Gras (Attimo) and, where applicable, to technical service providers bound by a contractual confidentiality obligation.

4.2 Sub-processors

Attimo uses technical sub-processors to operate the Platform. Each is bound by strict data protection obligations. The list of sub-processors is as follows:

Sub-processor	Service provided	Data location
OVH SAS	Hosting of the website and application, media file storage, backups	France (Gravelines, Roubaix)
Cognix Systems	Managed server hosting: system administration, monitoring, maintenance, backups. Holds administrator access to the production infrastructure.	France
Amazon Web Services	Facial recognition, Sport module (Rekognition)	Ireland (eu-west-1) — processed exclusively within the EU
Nero AG	Automated image restoration and upscaling processing, Restoration module	Germany (Karlsruhe) — own data centre
Stripe	Payment processing and collection on behalf of third parties	Ireland (EU) and United States (DPF framework)
PayPal	Payment processing	Luxembourg (EU)
Mollie	Payment processing	Netherlands (EU)
SystemPay (Lyra Network)	Payment processing	France
Attimo mail server	Sending of transactional emails from Attimo's server	France (Gravelines)
LiveKit Incorporated (if the photographer uses the Attimo Studio video call)	Video calls during connected sessions, without recording	United States; session data in the European Union (Frankfurt), voice and image may transit outside the EU without being stored there
Brevo (if enabled by the photographer)	Large-scale email delivery	France / EU
SMS Envoi	Sending of transactional SMS messages	France
Mondial Relay (if enabled by the photographer)	Order shipping and delivery tracking	France

Sub-processor	Service provided	Data location
Koy Lab (if enabled by the photographer)	Professional printing of albums and photographic prints	Portugal

ℹ The sub-processors listed above represent all providers that may be engaged by Attimo. Some are active by default (OVH, Cognix Systems, SystemPay, the mail server, SMS Envoi); others are engaged only where the photographer activates a specific feature (Amazon Web Services for the Sport module, Nero AG for the Restoration module, Brevo for large-scale email delivery, Mondial Relay for shipping, Koy Lab for professional printing).

In addition, subscribed photographers may configure their own mail server for the communications sent from their account. In that case, the provider chosen by the photographer becomes a sub-processor under their own responsibility.

4.3 Transfers outside the European Union

Personal data processed by Attimo is hosted and processed exclusively within the European Union. No data transfer to third countries is carried out, with the exception of the following services, covered by appropriate safeguards:

- Stripe: transfers governed by the Data Privacy Framework (DPF) between the European Union and the United States.
- LiveKit, for the Attimo Studio video call: voice and image may transit through servers located outside the European Union, without being stored or recorded there. This transfer is governed by LiveKit's data processing addendum (Data Privacy Framework and, failing that, the European Union standard contractual clauses).

No biometric or otherwise sensitive data is transferred outside the EU.

4.4 Legal recipients

Attimo may be required to disclose personal data to the competent administrative or judicial authorities in the event of a legal request or in order to comply with a regulatory obligation.

Article 5 — Data security

Attimo implements appropriate technical and organisational measures to ensure the security of the data processed, including:

- Password hashing using the bcrypt algorithm.
- Secure HTTPS/TLS connections across the entire Platform.
- Data isolation between photographers (multi-tenant architecture).

- Temporary signed URLs for accessing photographs stored on OVH, the storage container not being public.
- Two-factor authentication available for photographers' accounts.
- Limitation of login attempts and rate limiting on sensitive routes.
- Encryption in the database of credentials for third-party services.
- Regular automated backups, distributed across several separate infrastructures.
- Logging of access and sensitive actions, with automatic purging or anonymisation at the announced intervals.
- Regular updating of software components (Laravel, PHP, dependencies) and of the operating system.
- Pre-production environment strictly separated from the production environment.
- Continuous application monitoring and alerting in the event of anomalies.
- Hosting exclusively on infrastructure located in France and the European Union.
- Access to data restricted to authorised persons only.

⚠ In the event of a data breach likely to result in a risk to the persons concerned, Attimo undertakes to notify the CNIL (French Data Protection Authority) within 72 hours in accordance with Article 33 of the GDPR, and to inform the persons concerned where the breach presents a high risk.

Article 6 — Rights of data subjects

In accordance with the GDPR, every data subject has the following rights regarding their personal data:

6.1 Right of access (Article 15 GDPR)

You have the right to obtain confirmation as to whether or not your data is being processed, and to receive a copy of it.

6.2 Right to rectification (Article 16 GDPR)

You have the right to have inaccurate or incomplete data concerning you rectified.

6.3 Right to erasure (Article 17 GDPR)

You have the right to request the erasure of your data in the cases provided for by the GDPR, in particular where the data is no longer necessary, where you withdraw your consent, or where the processing is unlawful.

6.4 Right to restriction of processing (Article 18 GDPR)

You have the right to request the restriction of the processing of your data in certain cases (contesting accuracy, objecting to processing, etc.).

6.5 Right to data portability (Article 20 GDPR)

You have the right to receive your data in a structured, commonly used and machine-readable format, and to transmit it to another controller.

6.6 Right to object (Article 21 GDPR)

You have the right to object to the processing of your data based on legitimate interest, as well as to processing for direct marketing purposes.

6.7 Right to withdraw consent

Where processing is based on consent, you may withdraw it at any time, without affecting the lawfulness of the processing carried out before that withdrawal.

6.8 Post-mortem directives

You have the right to lay down directives concerning the fate of your data after your death. Those directives may be general or specific and are sent to Attimo by email.

6.9 Exercising your rights

To exercise one of these rights, send your request to info@attimo-gallery.com, together with a copy of a valid identity document.

Attimo undertakes to respond to your request within one month of receipt. That period may be extended by two months in the event of a complex request or a large volume, with notice given to the user.

6.10 Complaint to the supervisory authority

If, after contacting us, you believe that your rights have not been respected, you may lodge a complaint with the French Data Protection Authority (CNIL — Commission Nationale de l'Informatique et des Libertés):

- Website: https://www.cnil.fr
- Address: 3 place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, France
- Phone: +33 1 53 73 22 22

Users residing outside France may also contact the supervisory authority of their own

country.

ℹ For requests concerning data processed within a photographic gallery (as an end client), please contact the photographer concerned first, as they are the data controller. Attimo may nonetheless forward your request to them where necessary.

Article 7 — Cookies and trackers

The Attimo Platform uses cookies and similar technologies to ensure its proper functioning, to remember user preferences and to carry out anonymised audience measurement.

For full information on the cookies used and how to manage your preferences, please consult the Cookie Policy available on the Platform.

Article 8 — Minors

8.1 Direct registration on the Platform

The Attimo Platform is intended for adult professional photographers. Subscribing to an Attimo plan requires being of legal age within the meaning of applicable legislation (18 years old in France).

8.2 Protection of minors' data

In accordance with Article 8 of the GDPR and the French Data Protection Act, the processing of the personal data of a minor under the age of 15 requires the authorisation of the holders of parental authority. Attimo does not knowingly collect the personal data of minors under 15 without such authorisation.

8.3 Processing of minors' data in galleries (School and Nursery modules)

Within the School and Nursery modules, data relating to minors (including those under 15) may be processed on behalf of photographers. Such processing is systematically subject to the prior authorisation of the holders of parental authority, in accordance with the “Minors' Data” Addendum to the DPA, regardless of the age of the child concerned.

8.4 Reporting

If you find that a minor has provided us with personal data in a manner that does not comply with this policy, please contact us at info@attimo-gallery.com so that we may carry out the necessary checks and delete the data where applicable.

Article 9 — Automated decision-making and algorithmic processing

The Attimo Platform does not implement any wholly automated decision-making producing legal effects on the persons concerned within the meaning of Article 22 of the GDPR.

The Sport module uses artificial intelligence technologies (facial recognition and bib number reading) to make it easier to find photographs within large volumes of images. Such processing does not constitute automated decision-making within the meaning of Article 22, and its result can always be contested by the user.

The Restoration module implements automated generative processing applied to vintage photographs. That processing operates on an image and not on a person: it produces no decision, no assessment and no profiling. Every result is submitted to the photographer for human validation before delivery.

The referral programme's fraud detection system produces alerts that are systematically reviewed by a human administrator before any measure is taken (retroactive cancellation, ban). No decision producing legal effects within the meaning of Article 22 of the GDPR is taken in a wholly automated manner.

Article 10 — Amendments to this policy

Attimo reserves the right to amend this Privacy Policy at any time, in particular to comply with legislative or regulatory developments.

Any substantial amendment will be notified to users by email or by a notice on the Platform, with reasonable notice allowing each user to take note of it.

The date of the last update is indicated at the top of this document. It is advisable to consult this page regularly.

Article 11 — Contact

For any question relating to this Privacy Policy or to the exercise of your rights, you may contact Attimo:

- By email (general and GDPR): info@attimo-gallery.com
- By email (technical support): support@attimo-gallery.com
- By post: Frédéric Gras — Attimo, 38 avenue de Tournaisis, 78990 Élancourt, France
- By phone: +33 6 51 39 30 80

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