

Personal Data Protection Policy

(last updated: 20 July 2026)

I - Personal Data

PITCHY is concerned about protecting the personal information communicated by its customers (the “Personal Information”) and undertakes to ensure the best level of protection for this information in accordance with the European and French regulations applicable to it in terms of protection of personal data, in particular Law No. 78-17 of 6 January 1978 relating to information technology, files and liberties as amended, and any new law or decree issued for its application, such as the Digital Republic Act No. 2016-1321 of 7 October 2016 and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the “GDPR”.

This document explains: (i) how, for how long and for what purposes the Personal Information is used; (ii) how the Customer can access, correct, modify or delete the Personal Information that PITCHY holds about them; (iii) to whom PITCHY may, where applicable, disclose it; and (iv) the security measures put in place by PITCHY to protect the confidentiality of the Personal Information.

1. Data relating to information transmitted by the Customer for the performance of the Services

Pitchy acknowledges that it is aware of the confidential nature of all nominative data and information contained in the documents and files transmitted by the Customer.

Pitchy undertakes, as a subcontractor within the meaning of Article 4 of the GDPR, to process the information transmitted by the Customer, where applicable, only for the performance of the Services and within the limits of the object of this Agreement, the instructions and the purpose of the processing as specified in writing by the Customer.

Pitchy expressly guarantees the confidentiality of the personal data processed under this agreement and confirms that any staff members and/or subcontractors likely to access the personal data transmitted by the Customer, in its capacity as data controller, are all subject to a confidentiality obligation.

Pitchy undertakes, where applicable, to process the data in accordance with the Customer's documented instructions. If Pitchy considers that an instruction constitutes a breach of the GDPR or of any other provision of EU or Member State law relating to data protection, Pitchy will immediately inform the Customer.

In addition, if Pitchy is required to transfer data to a third country or an international organisation under EU or Member State law, Pitchy will inform the Customer of this legal obligation prior to the processing, unless the relevant law prohibits such information for important reasons of public interest.

Pitchy undertakes to take into account, with regard to its tools, products, applications or services, the principles of data protection by design and by default.

As far as possible, Pitchy will help the Customer fulfil its obligation to respond to requests to exercise data subjects' rights: right of access, rectification, erasure and objection, right to restriction of processing, right to data portability, and right not to be subject to a decision based solely on automated processing, including profiling.

With the Customer's agreement, Pitchy will notify the competent supervisory authority (the CNIL), on behalf of the Customer, of personal data breaches as soon as possible and, where feasible, no later than 72 hours after becoming aware of them, unless the breach in question is unlikely to result in a risk to the rights and freedoms of natural persons.

With the Customer's agreement, Pitchy will, on behalf of the Customer, communicate the personal data breach to the data subject as soon as possible, where the breach is likely to result in a high risk to the rights and freedoms of a natural person.

At the end of the Agreement, Pitchy undertakes, at the Customer's choice, to:

- destroy all personal data; or
- return all personal data to the data controller; or
- return the personal data to the subcontractor designated by the data controller.

2. Customer and User data

2.1. Data collected and purpose of collection

PITCHY collects the Personal Information voluntarily provided by the customer and Users, either through the collection forms made available on the Site or directly during the setup and performance of the Agreement.

Information that must be provided is marked with an asterisk on the collection form.

Personal Information is processed by PITCHY for the purposes of customer account management, marketing and statistical studies, and service quality monitoring, with the aim of providing customers and Users with the most appropriate services.

PITCHY only collects the data strictly necessary for the creation and management of the customer's and Users' accounts (name, usual name, first name, gender, date of birth, professional e-mail address, password), for the follow-up of the customer relationship such as satisfaction surveys, complaints handling and after-sales service, as well as for PITCHY's loyalty, information and promotional actions (such as sending newsletters) where the customer or User has expressly opted to subscribe to them.

2.2. Data storage and hosting

Personal Information is stored on encrypted computer files and kept on secure storage servers. For video generation and for permanent storage, data is processed in Amazon Web Services data centres located in Europe, in Dublin (Ireland). In the specific case of automatic subtitle transcription, the corresponding audio track (mp3) is processed by the company Authot, whose servers are located in France (OVH and Online.net).

In all cases, PITCHY takes appropriate measures to maintain an appropriate level of confidentiality and security of Personal Information during transfer and upon receipt, including by contractually requiring all its subcontractors and service providers to implement, on an ongoing basis, appropriate technical and organisational measures to secure Personal Information and ensure the same level of protection as required by the GDPR and applicable French data protection law.

2.3. Retention

Personal Information will only be kept in the operational database for the time strictly necessary for the purpose for which it was collected and processed.

Personal Information will then be archived with restricted access for an additional period for limited, legally permitted reasons (payment, warranty, litigation, accounting or archiving obligations, etc.). After this period, it will be deleted.

The retention periods are as follows:

Purpose of processing	Retention period
Order and purchase management	5 years from the last order or purchase
Use of the customer account	5 years from the last activity or unsubscription
Card payment data	15 months
Loyalty, information and promotional actions	3 years from the last activity on the Website or unsubscription
Data collected via email tracking pixels	See Section III below

2.4. Transmission of Personal Information

PITCHY will never transmit Personal Information to any third party likely to use it for its own purposes, in particular for commercial and/or direct advertising purposes, without the prior express consent of the Customer and Users.

PITCHY may disclose customers' Personal Information to legally authorised bodies and authorities where disclosure is required or authorised by law, or where PITCHY considers it necessary or appropriate to comply with applicable laws, or to protect or defend its rights or those of its employees, customers or any other person.

PITCHY may disclose customers' Personal Information to third parties in the event of a sale, transfer of assets, reorganisation or liquidation. PITCHY will notify the customer if their Personal Information becomes subject to a different privacy policy.

Personal Information collected may be communicated to third parties contractually linked to PITCHY for the performance of subcontracted tasks necessary for managing customer accounts or fulfilling orders placed on the Website or by any other means.

Except with the customer's express agreement at the time their Personal Information is collected, PITCHY may not transmit Personal Information to its partners (including companies within the same group) for communication and/or canvassing purposes, in particular by electronic, postal or telephone means.

Even after giving their agreement, Users may object to the continuation of such communications by sending a letter to PITCHY at the following address: 157 Boulevard Macdonald, 75019 Paris.

The Customer and Users are informed that data concerning them may be transmitted, for the purposes mentioned above, to companies located in countries outside the European Union that offer a lower level of data protection than the European Union. Prior to any transfer outside the European Union, PITCHY will take all necessary measures and safeguards to secure such transfers.

2.5. Security

In accordance with the GDPR, Law No. 2018-133 of 26 February 2018 on various provisions adapting French law to European Union law in the field of security, and Law No. 78-17 of 6 January 1978 relating to information technology, files and liberties as amended, PITCHY undertakes to take all appropriate precautions, given the nature of the data and the risks presented by the processing, to preserve the security of personal data concerning the Customer and Users, and in particular to prevent such data from being altered, damaged, or accessed by unauthorised third parties.

2.6. Data controller and customer rights

2.6.1 Data controller

The data controller is PITCHY BTOS PROD, a single-shareholder simplified joint stock company (SASU) with a share capital of €1,742.93, registered with the Paris Trade and Companies Register under number 799 416 011, whose registered office is located at 157 Boulevard Macdonald, 75019 Paris.

2.6.2 User rights

In accordance with the GDPR and applicable French data protection law, the User may:

- access all of their data: this right allows the User to ask PITCHY about the nature of the processing concerning them and to request a copy of all information concerning them. This right applies regardless of the legal basis of the processing (contract, legal obligation, consent, legitimate interest, etc.);
- object to the processing of their data: the right not to appear, or to no longer appear, in a data processing operation. This right applies where the processing is based on PITCHY's "legitimate interest";
- rectify, update, complete and delete their declarative data;
- request the portability of their data;
- request a restriction of the processing carried out by PITCHY in relation to their data, which may be exercised where one of the following grounds applies:
- the accuracy of the personal data is contested by the data subject, for a period allowing the controller to verify the accuracy of the data;
- the processing is unlawful and the data subject objects to erasure and requests restriction of use instead;
- the controller no longer needs the personal data for the purposes of the processing, but the data is still required by the data subject to establish, exercise or defend legal claims;
- the data subject has objected to the processing, pending verification of whether the controller's legitimate grounds override those of the data subject.

Furthermore, the User may provide PITCHY with instructions regarding the storage, erasure and communication of their Personal Data after their death, which instructions may also be registered with a "certified digital trusted third party". These instructions, a form of "digital will", may designate a person responsible for their execution; failing this, the User's heirs will be designated.

In the absence of any instructions, the User's heirs may contact PITCHY in order to:

- access processing enabling "the organisation and settlement of the deceased's estate";
- receive communication of "digital assets" or "data resembling family memories, transmissible to heirs";
- have the customer's account closed and object to further processing of their Personal Information.

To exercise their rights, the customer may send their request (indicating their e-mail address, surname, first name, postal address and a copy of their identity document):

- By e-mail to: contact@pitchy.fr

- By post to: 157 Boulevard Macdonald, 75019 Paris.

A response will be sent within a maximum of one (1) month following receipt of the request.

The customer may, at any time, lodge a complaint with the competent supervisory authority (in France, the CNIL: www.cnil.fr).

2.7. Legal basis for processing

The processing of Personal Information collected by PITCHY is based, depending on the case, on the following legal bases:

- Performance of the contract entered into with the Customer, for the management of the customer account, the provision of the subscribed Services and the follow-up of the contractual relationship;
- The data subject's consent, in particular for sending newsletters and commercial communications, as well as for the use of non-essential cookies (audience measurement, advertising and social media) and the email tracking pixels referred to in Section III below;
- PITCHY's legitimate interest, for carrying out statistical studies, improving its Services and securing its information systems;
- Compliance with a legal obligation, in particular in accounting, tax or anti-fraud matters.

2.8. Disclosure of personal data

The Personal Information of Customers and Users is not sold, rented or exchanged with third parties for commercial purposes. The disclosures described in Section 2.4 above are strictly limited to what is necessary for the performance of the Services and compliance with PITCHY's legal obligations.

II - Cookies

A “cookie” is a file installed on the User's device, enabling the storage of information relating to their browsing on the PITCHY website, in particular for the purposes of authenticating users, memorising their preferences and settings, determining the popularity of content, distributing advertising campaigns and measuring their effectiveness, analysing site traffic and, more generally, understanding the online behaviour and interests of people interacting with PITCHY's services.

Cookies may have a variable lifespan. “Session cookies” persist only while the User's browser remains open and are automatically deleted when the browser is closed. Other cookies are “persistent cookies”, meaning they remain active once the browser is closed. They may, for example, recognise the User's device when a new browsing session is opened.

The paragraphs below aim to provide the User with information about the cookies used by PITCHY or its partners when using the Site, and to offer a way to manage their choices.

PITCHY cookies

PITCHY uses cookies. A cookie is a computer file stored on the hard drive of the User's device. Its purpose is to record the User's previous visit to the Site, and it therefore does not allow identification or constitute Personal Information. Cookies are used by PITCHY solely to personalise the Services offered to Users.

Third-party cookies

When the User accesses the Website, one or more cookies from partner companies may be placed on their device.

PITCHY has no access to, and cannot exercise any control over, third-party cookies.

However, PITCHY ensures that partner companies agree to process information collected on the Website in compliance with the law and undertake to implement appropriate measures to secure and protect the confidentiality of the data.

Managing cookies

PITCHY has implemented a consent management platform (Axeptio), which appears as a consent banner displayed the first time a User visits the Site. This banner allows the User to make an informed choice among three options: accept all cookies, refuse non-essential cookies, or customise their choices category by category.

Cookies used on the Site fall into the following categories:

- Cookies strictly necessary for the operation of the Site: these cookies do not require consent and cannot be disabled, as they are essential for browsing and providing the Services requested by the User;
- Audience measurement (analytics) cookies: subject to the User's consent, these allow PITCHY to analyse Site traffic and improve its Services;
- Advertising and social media cookies: subject to the User's consent, these enable the display of targeted advertising content and the sharing of content on social media.

The User may, at any time, change their cookie preferences by accessing the Axeptio preference management module, available via the “Cookies” link in the Site's footer.

Independently of this module, the User retains the ability to manage cookies directly from their browser settings, via the Help section of the browser's toolbar. Please note that this browser configuration may prevent the User from accessing certain content or may significantly disrupt their browsing. In such cases, PITCHY declines all responsibility for any consequences linked to degraded performance of the Site resulting from the inability to use cookies necessary for its operation.

III - Email tracking pixels

As part of its email communications, PITCHY uses a tracking indicator (a “tracking pixel”) embedded in certain emails sent to its clients, prospects and Users.

This pixel allows PITCHY to know, for each recipient, whether the email has been opened, as well as the date of that opening.

Purpose of the processing

The information collected through this pixel allows PITCHY to:

- Personalise the content and offers sent to the recipient based on their demonstrated interest in PITCHY's communications;
- Measure the performance of email campaigns in order to improve the quality and relevance of the messages sent;
- Verify the proper deliverability of emails sent.

Legal basis

This processing is based on the recipient's consent, collected at the time their email address is gathered or, failing that, requested by email in accordance with the recommendations of the French Data Protection Authority (CNIL).

Right to object and withdrawal of consent

The recipient may, at any time and without justification, withdraw their consent to the use of this tracking pixel, without this affecting their receipt of PITCHY's communications. To exercise this right, they may send their request by email to contact@pitchy.fr.

Retention period

Data collected via the tracking pixel is retained for the period strictly necessary for the purposes described above. If a recipient has not been contacted for a period of six (6) months, PITCHY may request their consent again.