

PRIVACY POLICY

Privacy and Data Protection Policy

Everything we collect, everything we do not, and every right you can exercise over your data.

DOCUMENT

Privacy Policy

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Contents

17 SECTIONS · PRIVACY POLICY

01 Introduction

02 Changes to This Policy

03 Data Controller

04 Data Collection

05 How We Use Your Information

06 Local-Only Features and Peer-to-Peer Data Handling

07 Payments and Transactions

08 Your Rights Under GDPR

09 Data Retention

10 Sharing of Personal Data with Third Parties

11 International Data Transfers

12 Data Security

13 Children's Privacy

14 Cookies and Tracking Technologies

15 Third-Party Links and Services

16 Platform-Specific Provisions

17 Contact Information

Introduction

Hilda Labs (hereinafter "the Company", "we", "us" or "our") is a company registered in France. The Sendu application is developed by Hilda Labs.

Hilda Labs delivers its services via the Sendu application (hereinafter the "Application") available on Android, iOS, Desktop (macOS, Windows, Linux), and Android TV, as well as through our website <https://sendu.fr> (hereinafter the "Website").

The Website, our services, and the Sendu Application are globally referred to as the "Services".

The user is referred to as "User", "Member", "Visitor", or "you".

The User and the Company are the "Parties".

The Company attaches great importance to the integrity of your personal data and endeavors to treat it in the most secure and transparent way possible. The purpose of this Privacy and Data Protection Policy (herein "Privacy Policy") is to define how the Company manages information and data that identifies you, directly or indirectly ("Personal Data") when you use our Services, and to inform you of the rights you hold accordingly.

This Privacy Policy complies with the **General Data Protection Regulation (EU) 2016/679 ("GDPR")**, the French Data Protection Act (Loi Informatique et Libertés, n° 78-17 of January 6, 1978, as amended), and all applicable French and European data protection legislation.

Changes to This Policy

We reserve the right to change or update this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting, and your continued use of the Application or the Services will constitute agreement with these amendments.

The effective Privacy Policy is always available within the Application and on <https://sendu.fr>.

We encourage you to review this Privacy Policy periodically. If we make material changes, we will notify you through the Application or by other appropriate means.

Data Controller

The data controller responsible for the processing of your Personal Data is:

Hilda Labs

173 rue de Courcelles

75017 Paris

France

Email: support.sendu@hilda-ai.com

04

Data Collection

4.1 What We Collect

When you use our Services or create an account, the Company may collect the following information:

Account Information (via third-party authentication):

- Email address (provided by Google/Firebase Authentication)
- Display name (provided by Google/Firebase Authentication)
- Profile photo URL (provided by Google/Firebase Authentication)
- Unique user identifier (Firebase UID)

We do NOT collect or store:

- Passwords (authentication is entirely handled by Google/Firebase)
- Payment or banking information (handled entirely by third-party payment providers)
- Government-issued identification numbers
- Biometric data
- Health or medical data
- Precise geolocation data
- Any other sensitive personal data as defined by Article 9 of the GDPR

4.2 Automatically Collected Information

When you use our Services, the following non-personal or technical information may be collected automatically:

- **Log Information:** Application version, device type, operating system, access times, session duration, and crash reports
- **Device Information:** Device model, screen resolution, operating system version, unique device identifiers (for analytics purposes only)
- **Usage Data:** Features used, user interaction patterns, and general navigation within the Application (anonymized and aggregated)

4.3 Third-Party Authentication Data

If you sign in through Google (via Firebase Authentication), we receive limited profile information from your Google account, such as your name, email address, and profile picture, in accordance with Google's authorization procedures and the permissions you grant. We do not receive or store your Google password.

4.4 Device Permissions Used Locally

The Application may request device permissions that are used **only on your device and local network**, and are not used to send file contents to our servers:

- **Local network / nearby devices:** to discover and connect to other Sendu devices on the same Wi-Fi or LAN
- **Photos, media, and files / storage:** to let you select, transfer, share, stream, or save files locally
- **Notifications (optional):** to inform you of transfer or connection status

These permissions do not change the local-only nature of file transfer, streaming, and shared folders described in Section 6.

05

How We Use Your Information

The Personal Data and other information collected aims to provide the Services, improve them, and maintain a secure environment.

The legal bases for processing are:

- **Performance of a contract** (Article 6(1)(b) GDPR): to provide you with the Services you requested
- **Legitimate interest** (Article 6(1)(f) GDPR): to improve and secure our Services
- **Legal obligation** (Article 6(1)(c) GDPR): to comply with applicable laws and regulations

- **Consent** (Article 6(1)(a) GDPR): where applicable, for optional features or communications

We use the information collected to:

- Allow access and use of the Application by the User
- Provide, maintain, and improve our Services
- Provide user assistance and support
- Manage any disputes with Users
- Send transactional or relationship messages (e.g., account notifications, customer service responses)
- Monitor and analyze trends, usage, and activities in connection with our Services
- Detect, investigate, and prevent fraudulent transactions and other illegal activities
- Enable us to respond to your requests regarding your data protection rights
- Comply with applicable legal and regulatory obligations

We do NOT:

- Use your personal information for purposes unrelated to the reasons for which it was collected
- Retain personal information for longer than necessary
- Sell your personal information to any third party
- Use your data for targeted advertising or profiling

06

Local-Only Features and Peer-to-Peer Data Handling

Sendu's core functionality is built around **local network communication**. The features described below operate entirely within your local network (Wi-Fi or LAN) using direct peer-to-peer (P2P) connections between your devices. **No data processed by these features is ever sent to, routed through, or stored on any external server operated by Sendu or any third party.**

6.1 File Transfer

The file transfer feature allows you to send and receive files directly between devices connected to the same local network. Files are transmitted through a direct peer-to-peer connection between the sending and receiving devices. The content of transferred files is

never uploaded to any cloud service, remote server, or intermediary. Once the transfer is complete, the Application does not retain any copy of the transferred files beyond what the receiving device has saved locally.

6.2 Stream to TV

The stream-to-TV feature allows you to cast or stream media content from your device to an Android TV or other compatible display on your local network. The media stream travels directly from your device to the target display over the local network. No media content is relayed through, buffered on, or recorded by any external server. The Company has no access to the content you stream.

6.3 Shared Folder

The shared folder feature enables you to make a folder on your device accessible to other devices on the same local network. Access to shared folders is limited exclusively to devices connected to your local network. No folder content, metadata, or file listing is transmitted outside your local network or stored on any remote server. When you stop sharing a folder or disconnect from the network, access is immediately revoked.

6.4 Download from Shared Folder

This feature allows you to browse and download files from a shared folder made available by another device on the same local network. Downloads occur through a direct peer-to-peer connection between the two devices. No download activity, file content, or transfer history is logged, transmitted to, or stored on any server outside your local network.

6.5 No External Access — Privacy by Design

Sendu's local features are designed with a **privacy-by-design** approach:

- **No remote access:** The Application cannot be accessed, controlled, or monitored from outside your local network. There is no remote server, relay, or gateway that could enable external access to your local features or data.
- **No data transmission to Sendu servers:** None of the content you transfer, stream, share, or download through these features ever reaches any server operated by Sendu. We have no technical capability to access, intercept, or view this data.
- **No logging of local activity:** The Company does not log, record, or collect any information about the files you transfer, the media you stream, the folders you share, or the content you download through these local features.

- **User-controlled:** All local features are initiated and controlled entirely by you. You decide what to share, with whom, and for how long. The Application provides no mechanism for the Company or any third party to initiate, access, or interfere with these local operations.
- **Session-based:** Local connections and shared resources exist only for the duration of your active session. No persistent connection or access is maintained after the Application is closed or the device is disconnected from the local network.

This architecture ensures that your files, media, and shared content remain entirely under your control and within your local network at all times.

07

Payments and Transactions

All payments and financial transactions within the Application are handled entirely by third-party payment providers, including but not limited to:

- **Google Play Billing** (for Android and Android TV)
- **Apple In-App Purchase** (for iOS)
- **Stripe** (for desktop and web transactions)
- **RevenueCat** (for subscription management across platforms)

We do **NOT** collect, store, or process any payment card details, banking information, or other financial data. All payment processing is subject to the terms and privacy policies of the respective third-party payment providers:

- Google Play: <https://policies.google.com/privacy>
- Apple: <https://www.apple.com/legal/privacy/>
- Stripe: <https://stripe.com/privacy>
- RevenueCat: <https://www.revenuecat.com/privacy/>

We may receive limited transactional information from these providers (e.g., confirmation of purchase, subscription status, expiration date) solely to grant you access to the purchased features or content.

08

Your Rights Under GDPR

In accordance with the GDPR and applicable French data protection law, you have the following rights regarding your Personal Data:

- **Right of access** (Article 15 GDPR): You have the right to obtain confirmation as to whether Personal Data concerning you is being processed and, if so, to access that data.
- **Right to rectification** (Article 16 GDPR): If Personal Data held by the Company is inaccurate or incomplete, you may request that it be corrected or completed.
- **Right to erasure** (Article 17 GDPR): You may request the deletion of your Personal Data, subject to applicable legal obligations.
- **Right to restriction of processing** (Article 18 GDPR): You may request that we restrict the processing of your Personal Data under certain circumstances.
- **Right to object** (Article 21 GDPR): You may object to the processing of your Personal Data based on legitimate interests.
- **Right to data portability** (Article 20 GDPR): You may request to receive your Personal Data in a structured, commonly used, and machine-readable format.
- **Right to withdraw consent**: Where processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing before its withdrawal.
- **Right regarding post-mortem data management**: In accordance with French law n° 2016-1321 of October 7, 2016, you have the right to provide instructions regarding the management of your data after your death.

How to Exercise Your Rights

You may exercise any of these rights by contacting us at:

Hilda Labs

173 rue de Courcelles
75017 Paris
France

Email: support.sendu@hilda-ai.com

All requests must be accompanied by proof of identity. We will respond within **one (1) month** of receiving your request. This period may be extended by two additional months if the complexity or volume of requests requires it; in such cases, we will inform you of the extension within the first month.

Account and Data Deletion

If you create an account, you may request deletion of your account and associated Personal Data:

- **In the Application:** from the account or settings area (easy to find, without contacting support first)
- **Without the Application:** by sending an email to support.sendu@hilda-ai.com or via <https://sendu.fr> (so you can request deletion even if the app is uninstalled)

Account deletion removes your account from our records and deletes associated Personal Data that we are not legally required to retain. Temporary deactivation or freezing of an account is not treated as deletion.

Deletion is completed within **thirty (30) days**, except where retention is required by law (for example certain transaction records for tax purposes).

SUBSCRIPTIONS

deleting your account does not automatically cancel a paid subscription billed by Apple or Google. You must cancel auto-renewal in your Apple ID or Google Play account settings. Billing may continue until you cancel there.

Filing a Complaint

You have the right to lodge a complaint with the French data protection authority:

Commission Nationale de l'Informatique et des Libertés (CNIL)

Website: <https://www.cnil.fr>

We recommend contacting us first, as we are fully committed to resolving any data protection concerns you may have.

09

Data Retention

The Company retains your data only for the time necessary to provide you with its Services.

- **Account data** is retained for as long as your account is active
- **Upon account deletion**, your Personal Data is deleted within **thirty (30) days**, except where retention is required by law

- **Technical logs** are retained for a maximum of **twelve (12) months** for security and debugging purposes
- **Transaction records** may be retained as required by applicable French tax and commercial law

To the extent reasonably necessary or required to satisfy legal or regulatory obligations, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may retain limited information even after you have closed your account.

10

Sharing of Personal Data with Third Parties

We may share limited Personal Data with the following categories of third parties:

- **Authentication providers** (Google, Firebase): to manage your account sign-in
- **Payment processors** (Google Play, Apple, Stripe, RevenueCat): to process transactions (no payment data is shared by us; these providers collect data directly from you)
- **Analytics providers** (Firebase Analytics, Google Analytics): to understand usage patterns and improve our Services (data is anonymized and aggregated)
- **Hosting and infrastructure providers**: to operate and maintain the Application
- **Legal authorities**: if required by law, to respond to lawful requests, court orders, or legal proceedings

These third parties have access to your Personal Data only to perform their specific functions and are contractually obligated not to disclose or use it for any other purpose. Our third-party partners have been selected with care and are GDPR-compliant.

We do NOT sell, rent, or trade your Personal Data to any third party.

11

International Data Transfers

Some of our third-party service providers (such as Google and Firebase) may process data outside the European Economic Area (EEA). In such cases, we ensure that appropriate safeguards are in place, including:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission
- Transfers to countries with an **adequacy decision** from the European Commission

- Other safeguards as required under Chapter V of the GDPR

For more information about how Google handles data transfers, please visit:

<https://policies.google.com/privacy/frameworks>

1 2

Data Security

We implement appropriate technical and organizational measures to protect your Personal Data against unauthorized access, alteration, disclosure, or destruction. These measures include:

- Use of secure, encrypted connections (HTTPS/TLS)
- Authentication managed exclusively through Google/Firebase secure infrastructure
- No storage of passwords or sensitive financial data on our servers
- Regular review of our data collection, storage, and processing practices
- Restricted access to Personal Data to authorized personnel only

While we strive to protect your Personal Data, no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee absolute security but are committed to maintaining industry-standard protections.

1 3

Children's Privacy

Our Services are not directed to children under the age of **16** (or the applicable minimum age in your jurisdiction). We do not knowingly collect Personal Data from children under this age.

If we become aware that we have collected Personal Data from a child under the applicable minimum age without parental consent, we will take steps to delete that information as promptly as possible.

If you believe that a child has provided us with Personal Data, please contact us at support.sendu@hilda-ai.com.

1 4

Cookies and Tracking Technologies

14.1 Website Cookies

When you visit our Website, we may use cookies and similar tracking technologies. Cookies are small text files stored on your device that help us provide and improve our Services.

Types of cookies we may use:

- **Strictly necessary cookies:** Essential for the Website to function properly. These cannot be disabled.
- **Analytics cookies:** Help us understand how visitors interact with our Website (e.g., Google Analytics). These are only activated with your consent.

14.2 Mobile Application

The Application may use Firebase Analytics and similar tools to collect anonymized usage data. This data helps us understand how the Application is used and how we can improve it.

14.3 Managing Cookies

You may manage or disable cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of our Website.

Cookie consent is valid for a period of **thirteen (13) months**, in accordance with CNIL guidelines.

For more information about Google Analytics and how to opt out, visit:

- <https://www.google.com/policies/privacy/partners/>
- <https://tools.google.com/dlpage/gaoptout>

15

Third-Party Links and Services

Our Services may contain links to third-party websites or services. We are not responsible for the privacy practices or content of these third-party services. We encourage you to review the privacy policies of any third-party services you access through our Application.

Platform-Specific Provisions

16.1 Android and Android TV (Google Play)

The Application complies with the Google Play Developer Program Policies, including the User Data policy. We provide this Privacy Policy as required by the Google Play Store. The information in this policy is intended to match the Data safety declarations in Google Play Console (account data, identifiers, diagnostics, and purchases handled by Google Play).

16.2 iOS (Apple App Store)

The Application complies with the Apple App Store Review Guidelines, including App Tracking Transparency requirements. We do not track users across apps or websites owned by other companies for advertising purposes. The information in this policy is intended to match the App Privacy labels in App Store Connect.

16.3 Desktop (macOS, Windows, Linux)

The desktop Application follows the same data collection and privacy practices as the mobile versions. No additional data is collected on desktop platforms beyond what is described in this policy.

Contact Information

For any questions relating to this Privacy and Data Protection Policy, your Personal Data, or to exercise any of your rights, you can contact us at:

Hilda Labs

173 rue de Courcelles
75017 Paris
France

Email: support.sendu@hilda-ai.com

Website: <https://sendu.fr>

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