

Privacy Policy

Privacy Policy

Effective Date: April 13, 2024

This Privacy Policy describes how SASU The Reflection (“we,” “our,” “us”) collects, uses, discloses, and protects personal data in connection with the use of our website (thereflection.io) and our SaaS platform The Reflection.

We are committed to safeguarding your privacy and ensuring that your personal information is processed in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and other applicable data protection laws.

1. Who We Are

SASU The Reflection is a company registered in France, headquartered at:

11 Rue Carnot, 94270 Le Kremlin-Bicêtre, France

We provide AI-powered e-learning and corporate training services worldwide via our online platform.

2. Information We Collect

We collect the following categories of information:

- Visitors (when you visit thereflection.io):

- * Technical information (IP address, browser type, device data, cookies).

- * Voluntary information (newsletter sign-up, contact form submissions).

- Clients / Users of the Platform:

- * Account details (name, email address, company, role).

- * Usage data generated during training sessions (dialogues, choices, feedback logs).

We do not collect sensitive data (e.g., health, political opinions, religious beliefs).

3. How We Use Personal Data

We use your data only for legitimate business purposes, including:

- Providing access to and operating The Reflection platform.

- Managing client accounts and contracts.

- Improving services through anonymized analytics.

- Communicating updates, product news, or support information.
- Ensuring platform security, fraud detection, and compliance.

We never sell your personal data to third parties.

4. Data Processing and Storage

- All primary hosting and data storage take place in the European Union (OVHcloud, Paris, France).
- Data is encrypted in transit (TLS 1.2/1.3) and at rest (AES-256).
- Regular backups and a disaster recovery plan are in place.
- We apply strict role-based access controls and enforce multi-factor authentication internally.

5. Data Retention and Deletion

- Personal data is retained only as long as necessary for the purposes described in this Policy or as required by law.
- Upon termination of a contract or at the client's request, all personal data is securely deleted within the agreed retention period.
- Aggregated and anonymized data may be retained for analytical and research purposes.

6. Your Rights (under GDPR)

As a data subject, you have the following rights:

- Access to your personal data.
- Rectification of inaccurate or incomplete data.
- Erasure ("right to be forgotten") where applicable.
- Restriction of processing in certain circumstances.
- Data portability (receiving your data in a structured, machine-readable format).
- Objection to certain processing activities.
- Lodge a complaint with the relevant supervisory authority.

You may exercise your rights at any time by contacting us at privacy@thereflection.io.

7. Security Measures

We maintain comprehensive Technical and Organizational Measures (TOMs), including:

- Firewalls and network segmentation.
- Vulnerability management and penetration testing.
- Logging and monitoring of system activities.
- Formal incident response plan aligned with GDPR Art. 33 (72h notification).
- Business continuity and disaster recovery procedures.

8. Data Ownership

Clients retain full ownership and control of their data.

SASU The Reflection provides the platform and ensures secure processing, but does not claim rights over client content.

9. Updates to this Policy

We may update this Privacy Policy from time to time. Significant changes will be communicated via our website and, where appropriate, directly to clients.

10. Contact Us

For any inquiries regarding this Privacy Policy or your data rights, please contact:

privacy@thereflection.io

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France