

VINCENT CHOPIN

Independent Product Audit

Privacy Policy

Politique de Confidentialité

Effective date: August 6, 2026

Last updated: August 6, 2026

Data controller: Vincent Chopin, 107 cours Richard Vitton, 69003 Lyon, France. Contact: contact@vincentchopin.co.

This Privacy Policy describes how Vincent Chopin ("we," "us," "our") collects, uses, and protects personal data in connection with the website vincentchopin.co and the PRD Audit Service.

1. Data We Collect

1.1 Data you provide directly:

Name, email, company name — for order processing, communication, invoicing. Legal basis: Contract performance (Art. 6.1.b GDPR).

Industry sector — for selecting the appropriate audit module. Legal basis: Contract performance (Art. 6.1.b GDPR).

PRD document (uploaded file) — for performing the audit service. Legal basis: Contract performance (Art. 6.1.b GDPR).

Payment information — processed by Stripe, not stored by us. Legal basis: Contract performance (Art. 6.1.b GDPR).

1.2 Data collected automatically:

Page views, traffic sources, session duration — via cookieless analytics. Legal basis: Legitimate interest (Art. 6.1.f GDPR). No personal data is collected.

1.3 Data we do NOT collect:

We do not use tracking cookies. We do not run advertising trackers. We do not collect data from social media profiles. We do not purchase data from third parties.

2. How We Use Your Data

Your data is used exclusively for: processing and delivering the Service you ordered; communicating with you about your order; issuing invoices and complying with French accounting obligations; improving our methodology using anonymized, aggregated data; and website analytics (anonymized, no personal data involved).

We do not use your data for marketing, profiling, automated decision-making, or any purpose other than those listed above.

3. AI Processing — Transparency

In compliance with the EU AI Act (Article 50), we inform you that your PRD document is processed using AI-augmented analysis tools as part of our audit methodology.

AI sub-processor: Anthropic PBC (Claude), San Francisco, USA. DPA status: Signed Data Processing Agreement with Anthropic. Data transfer mechanism: Standard Contractual Clauses (SCCs) as per Art. 46.2.c GDPR.

The AI system is used as a tool under human oversight. It does not make autonomous decisions about you or your business. The scoring framework, calibrations, and final recommendations are designed and validated by a human professional.

4. Data Sharing and Recipients

Anthropic PBC (Claude) — AI-augmented PRD analysis — USA — DPA + SCCs.

Stripe Inc. — Payment processing — USA — DPA + PCI-DSS Level 1 + SCCs.

Google LLC (Workspace) — Email communication, document storage — USA/EU — DPA + SCCs.

Tally — Submission form and file upload — EU infrastructure — DPA available.

Analytics — Website analytics — EU servers — No personal data collected.

We do not sell, rent, or share your personal data with any other third party.

5. International Data Transfers

Some of our sub-processors are located outside the European Economic Area (EEA), specifically in the United States. All transfers are protected by Standard Contractual Clauses (SCCs) approved by the European Commission (Art. 46.2.c GDPR), Data Processing Agreements with each sub-processor, and supplementary measures as appropriate (encryption, access controls).

6. Data Retention

Client PRD and working files: 30 days after delivery, then permanently deleted.

Invoices and accounting records: 10 years (French legal obligation, Code de commerce Art. L123-22).

Email correspondence: 2 years after last contact.

Website analytics: Indefinite (anonymized, no personal data).

A certificate of data destruction is available upon request after the 30-day retention period.

7. Your Rights

Under the GDPR (Articles 15-22), you have the right to: access your personal data (Art. 15); rectify inaccurate data (Art. 16); erase your data — "right to be forgotten" (Art. 17); restrict processing (Art. 18); data portability (Art. 20); and object to processing based on legitimate interest (Art. 21).

To exercise any of these rights, contact us at: contact@vincentchopin.co. We will respond within 30 days.

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the CNIL (Commission Nationale de l'Informatique et des Libertés), 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07 — www.cnil.fr.

8. Security Measures

We implement the following measures: AES-256 encryption for data at rest, TLS 1.2+ for data in transit; two-factor authentication (2FA) on all professional accounts; dedicated password manager (Bitwarden) with unique credentials; full-disk encryption (FileVault/BitLocker) on all work devices; encrypted weekly

backups; and client notification within 24 hours of any suspected breach, CNIL notification within 72 hours if required (Art. 33 GDPR).

9. Changes to This Policy

We may update this Privacy Policy from time to time. The updated version will be posted on the Website with a revised "Last updated" date. Significant changes will be communicated by email to active clients.