

PRIVACY POLICY

Multi-Jurisdictional Data Protection Notice

Cubink Digital

operated by VAULTIER Jerome

SIRET: 910223668 00021

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1. JURISDICTION-SPECIFIC APPLICABILITY

This Privacy Policy applies globally to all users of our services, with specific provisions for:

 European Union: General Data Protection Regulation (GDPR) compliance

 United Kingdom: UK GDPR and Data Protection Act 2018 compliance

 United States: Federal and state-specific privacy law compliance including:

- California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA)
- Virginia Consumer Data Protection Act (VCDPA)
- Colorado Privacy Act (CPA)
- Connecticut Data Privacy Act (CTDPA)
- Utah Consumer Privacy Act (UCPA)
- CAN-SPAM Act and other federal regulations

2. DEFINITIONS

Terms with capital letters refer to the following definitions

Company," "we," "us," or "our" refers to VAULTIER Jerome operating as a sole proprietorship (Cubink Digital) with SIRET number 910 223 668, whose registered office is located at 60 rue François 1er C/O LegalPlace, 75008 PARIS, FRANCE.

Sites refers to websites accessible from <https://cubink.io>, <https://cubink.fr>, <https://e-consultants.net> and their sub-sites.

You," "your," or "data subject" refers to individuals whose personal information we process.

"Personal Data/Information" means any information relating to an identified or identifiable individual, directly or indirectly.

"Processing" includes any operation performed on personal data (collection, recording, organization, storage, adaptation, communication, erasure, etc.).

"Controller/Business" means the entity determining purposes and means of processing (Cubink Digital).

"Processor/Service Provider" means entities processing data on our behalf.

3. DATA CONTROLLER/BUSINESS INFORMATION

EU/UK Data Controller: VAULTIER Jerome (Sole Proprietor)

US Business Entity: Cubink Digital (operated by VAULTIER Jerome)

Business Classification: AI Infrastructure Development and Digital Strategy Services

4. PERSONAL INFORMATION WE COLLECT

4.1 Information Categories (All Jurisdictions)

Identity Information:

- Name, email address, phone number, postal address
- Company name, job title, professional information
- Date of birth (optional, for promotional offers)

Commercial Information:

- Purchase history, service interactions, transaction records
- Payment method details, billing information
- Customer service communications, support tickets

Technical Information:

- IP addresses, device identifiers, browser information
- Website usage data, cookies, session information
- Connection logs, system performance data

Professional Information:

- Business requirements, technical specifications
- System architecture details, integration needs

- Project communications, strategic discussions

Communication Records:

- Email correspondence, meeting notes
- Marketing communications, survey responses
- Feedback, reviews, and testimonials

4.2 California-Specific Categories (CCPA/CPRA)

In the preceding 12 months, we have collected the following categories of personal information:

Category	Disclosed for Business Purpose	Third Parties
Identifiers	✓ Service providers	Cloud hosts, email platforms
Commercial information	✓ Service providers	Payment processors, CRM systems
Internet activity	✓ Service providers	Analytics providers
Inferences	✓ Service providers	Marketing platforms

We do NOT collect: Social Security numbers, driver's license numbers, passport numbers, financial account information, health information, or biometric data.

5. SOURCES OF PERSONAL INFORMATION

We collect personal information from:

- Direct interactions: Forms, emails, phone calls, meetings
- Automated technologies: Cookies, web beacons, analytics
- Third-party sources: Business partners, public databases, social media
- Service integrations: CRM systems, email platforms, payment processors

6. PURPOSES FOR PROCESSING/BUSINESS PURPOSES

6.1 EU/UK Legal Bases:

- Contract Performance: Service delivery, billing, customer support
- Legitimate Interest: Marketing, business development, fraud prevention
- Consent: Marketing communications, non-essential cookies
- Legal Obligation: Tax compliance, regulatory requirements

6.2 US Business Purposes:

- Service Delivery: AI infrastructure development, technical support
- Business Operations: Customer relationship management, billing
- Marketing: Promotional communications, product announcements
- Analytics: Performance measurement, service improvement
- Security: Fraud prevention, system protection
- Legal Compliance: Regulatory requirements, legal obligations

6.3 Commercial Purposes (California):

- No Sale of Personal Information: We do not sell personal information to third parties
- Limited Sharing: We may share information with service providers for business purposes

7. DISCLOSURE OF PERSONAL INFORMATION

7.1 Service Providers/Processors

We share personal information with:

- Technical Infrastructure: Cloud hosting, security services
- Communication Platforms: Email marketing, customer support systems
- Analytics Providers: Website analytics, performance monitoring
- Payment Processors: Billing and transaction processing
- Professional Services: Legal, accounting, consulting services

7.2 Legal Disclosures

We may disclose personal information when required by:

- Legal process, court orders, government requests
- Law enforcement investigations
- Protection of rights, property, or safety
- Business transfers or acquisitions

7.3 California-Specific Disclosures (Last 12 Months)

Category	Disclosed for Business Purpose	Third Parties
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Identifiers	✓ Service providers	Cloud hosts, email platforms
Commercial information	✓ Service providers	Payment processors, CRM systems
Internet activity	✓ Service providers	Analytics providers
Inferences	✓ Service providers	Marketing platforms

We have NOT sold personal information to third parties in the preceding 12 months.

8. INTERNATIONAL DATA TRANSFERS

8.1 EU Transfers

- Adequacy Decisions: Transfers to countries with adequate protection
- Standard Contractual Clauses: EU Commission-approved clauses
- Binding Corporate Rules: Internal data transfer mechanisms

8.2 UK Transfers

- UK Adequacy Regulations: Transfers to recognized countries
- UK International Data Transfer Agreement: Standard clauses
- Data Protection Impact Assessments: High-risk transfer evaluations

8.3 US Transfers

- Cross-Border Data Flows: Compliance with federal and state requirements
- Vendor Agreements: Contractual protections for international transfers

9. DATA RETENTION PERIODS

9.1 General Retention Schedule

Data Category	EU/UK Retention	US Retention	Purpose
Active customer data	Duration of relationship	Duration of relationship	Service delivery

Prospect data	3 years from last contact	3 years from last contact	Marketing
Contract records	10 years (legal requirement)	7 years (business records)	Legal compliance
Payment data	13-15 months	7 years	Dispute resolution
Marketing data	Until consent withdrawal	Until opt-out	Communications
Analytics data	26 months maximum	26 months maximum	Performance analysis

9.2 Deletion Procedures

- Automated Deletion: System-automated removal at retention expiry
- Manual Review: Regular audits for data minimization
- Secure Disposal: Cryptographic erasure and physical destruction

10. YOUR PRIVACY RIGHTS

10.1 EU Rights (GDPR)

- Access: Obtain copies of your personal data
- Rectification: Correct inaccurate information
- Erasure: Delete personal data ("right to be forgotten")
- Restriction: Limit processing in specific circumstances
- Portability: Receive data in machine-readable format
- Objection: Object to processing based on legitimate interest
- Consent Withdrawal: Withdraw consent for consent-based processing

10.2 UK Rights (UK GDPR)

Same as EU rights plus:

- Automated Decision-Making: Rights regarding automated processing
- Data Protection Impact Assessments: Right to information about high-risk processing

10.3 California Rights (CCPA/CPRA)

- Right to Know: Categories and specific pieces of personal information collected
- Right to Delete: Request deletion of personal information

- Right to Correct: Request correction of inaccurate personal information
- Right to Opt-Out: Opt-out of sale/sharing of personal information
- Right to Limit: Limit use of sensitive personal information
- Right to Non-Discrimination: Equal service regardless of privacy choices

10.4 Other US State Rights

Virginia, Colorado, Connecticut, Utah:

- Similar rights to California with state-specific variations
- Right to opt-out of targeted advertising
- Right to opt-out of profiling for legal/significant effects

11. EXERCISING YOUR RIGHTS

11.1 How to Submit Requests

Email: econsultant.net@gmail.com (Subject: "Privacy Rights Request - [Your Request]")

Phone: +33 (0)6 17 63 02 43

Postal Mail: 60 rue François 1er C/O LegalPlace, 75008 PARIS, FRANCE

11.2 Identity Verification

We may request additional information to verify your identity before processing requests:

- Low-Risk Requests: Email verification may be sufficient
- High-Risk Requests: Government-issued ID or additional verification

11.3 Response Timeframes

- EU/UK: 30 days (extendable to 60 days for complex requests)
- California: 45 days (extendable to 90 days for complex requests)
- Other US States: 45-60 days depending on state requirements

11.4 Authorized Agents (California)

You may designate an authorized agent to submit requests on your behalf by providing:

- Written authorization from the consumer
- Proof of authorized agent registration with California Secretary of State

12. COOKIES AND TRACKING TECHNOLOGIES

12.1 Cookie Types

Strictly Necessary: Essential for website functionality

Performance/Analytics: Website usage statistics and optimization

Functional: Enhanced features and personalization

Targeting/Advertising: Personalized advertising and content

12.2 Cookie Management

EU/UK: Explicit consent required for non-essential cookies

California: Opt-out available through "Do Not Sell or Share" mechanisms

Other US States: Various opt-out requirements depending on jurisdiction

12.3 Third-Party Cookies

We use cookies from:

- Google Analytics (performance tracking)
- Facebook Pixel (advertising optimization)
- Other marketing and analytics platforms

Cookie Settings: [\[Link to Cookie Preference Center\]](#)

13. CALIFORNIA-SPECIFIC NOTICES

13.1 "Do Not Sell or Share My Personal Information"

[\[DO NOT SELL OR SHARE LINK\]](#)

We do not sell personal information for monetary consideration. We may share information for business purposes as described in this policy.

13.2 Financial Incentives

We may offer financial incentives (discounts, promotions) in exchange for personal information. Participation is voluntary and you may withdraw at any time.

13.3 Sensitive Personal Information

We do not collect or process sensitive personal information as defined by CCPA/CPRA.

14. CHILDREN'S PRIVACY

Our services are not directed to individuals under:

- EU/UK: 16 years of age (or lower age set by member state)
- US: 13 years of age (COPPA compliance)

We do not knowingly collect personal information from children. If we become aware of such collection, we will delete the information immediately.

15. SECURITY MEASURES

15.1 Technical Safeguards

- Encryption: TLS/SSL encryption for data transmission
- Access Controls: Multi-factor authentication, role-based access
- System Security: Regular security updates, vulnerability assessments
- Data Protection: Backup systems, disaster recovery procedures

15.2 Organizational Measures

- Privacy Training: Regular staff training on data protection
- Privacy Policies: Comprehensive internal privacy procedures
- Vendor Management: Due diligence on third-party processors
- Incident Response: Procedures for data breach management

16. DATA BREACH NOTIFICATION

16.1 EU/UK Requirements

- Supervisory Authority: Notification within 72 hours
- Individual Notification: Without undue delay for high-risk breaches
- Documentation: Comprehensive breach records and response measures

16.2 US Requirements

- State Laws: Notification requirements vary by state
- Federal Requirements: Sector-specific notification requirements
- Consumer Notification: Direct notification for significant breaches

17. CONTACT INFORMATION AND COMPLAINTS

17.1 Data Protection Contact

Primary Contact: VAULTIER Jerome

Email: econsultant.net@gmail.com

Phone: +33 (0)6 17 63 02 43

Address: 60 rue François 1er C/O LegalPlace, 75008 PARIS, FRANCE

17.2 Supervisory Authorities

European Union:

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

3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07

Website: www.cnil.fr

United Kingdom:

Information Commissioner's Office (ICO)

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Website: ico.org.uk | Phone: 0303 123 1113

United States:

California: California Privacy Protection Agency (CPPA) - coppa.ca.gov

Federal: Federal Trade Commission (FTC) - consumer.ftc.gov

18. UPDATES TO THIS POLICY

We may update this Privacy Policy to reflect:

- Changes in our data processing practices
- New legal or regulatory requirements
- Service enhancements or modifications

18.1 Notification Methods

- Email notification for material changes
- Website notice for 30 days minimum
- Consent renewal when required by law

19. GOVERNING LAW

This Privacy Policy is governed by:

- EU/UK Users: GDPR, UK GDPR, and French data protection law
- California Users: CCPA/CPRA and California law
- Other US Users: Applicable federal and state privacy laws
- International Users: French law with recognition of applicable local privacy rights

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Effective Date: Oct 01 2025