

PRIVACY POLICY

VERN Mobile Application

Last updated: April 5, 2026

1. Data Controller

This Privacy Policy describes how your personal data is collected, used, and protected when you use the VERN mobile application (the “Application”).

The data controller is:

Private Gallery Group SAS

Simplified joint-stock company (SAS) with a share capital of €10,000

Registered office: 1 Place Paul Verlaine, 92100 Boulogne-Billancourt, France

SIREN: 895 068 187 — RCS Nanterre

VAT number: FR36895068187

Website: <https://www.vern.guide>

Contact: contact@privategallery.fr

2. Personal Data Collected

When using the Application, we may collect the following data:

2.1 Data Provided by the User

- **Identity information:** first name, last name, date of birth, nationality.
- **Contact details:** email address, phone number, postal address, zip code.
- **Travel data:** passport or ID number, flight number, pick-up and drop-off location (when required by the booked ticket).
- **Chat messages:** content of conversations with the AI assistant Jules.
- **Search terms:** queries entered in the Application’s search bar.

2.2 Automatically Collected Data

- **IP address:** used to determine your country and city via the ipwho.is service.
- **Anonymous device identifier:** locally generated UUID (AsyncStorage) used to associate orders with your device. This identifier does not allow us to personally identify you.
- **Standard Expo telemetry:** technical data related to the build and updates of the Application (Expo/EAS).

3. Purposes of Processing

Your personal data is processed for the following purposes:

- **Contract performance:** processing your bookings, issuing tickets, managing orders and cancellations.

- **Service delivery:** displaying the interactive map, personalized activity suggestions, operation of the AI assistant.
- **Payment:** secure processing of payments by credit card, Apple Pay, or Google Pay via Stripe.
- **Geolocation:** automatic detection of your country to adapt the content offered.
- **Service improvement:** analysis of Application usage and bug fixing.

4. Legal Basis for Processing

In accordance with the General Data Protection Regulation (GDPR), data processing is based on:

- **Performance of a contract (Art. 6(1)(b) GDPR):** for processing bookings and payments.
- **Legitimate interest (Art. 6(1)(f) GDPR):** for service improvement, IP geolocation, and fraud prevention.
- **Consent (Art. 6(1)(a) GDPR):** where applicable, for the use of analytical cookies or the sending of marketing communications.

5. Data Sharing with Third Parties

We share your personal data with the following service providers, strictly necessary for the operation of the Application:

5.1 Stripe (Payment)

Stripe processes your payment information (credit card, Apple Pay, Google Pay). The Application never stores your card data. Stripe is PCI-DSS certified.

Stripe Privacy Policy: <https://stripe.com/privacy>

5.2 Tiqets (Ticketing)

Tiqets is our ticket and activity provider. Data shared includes: name, email, phone number, visitor details, and product selection.

Tiqets Privacy Policy: <https://www.tiqets.com/en/privacy-policy/>

5.3 Firebase / Google Cloud (Database and Backend)

Firebase Firestore hosts the activity catalog and order data (traveler information, payment status, ticket PDFs, device identifier). Google Cloud Functions handles server-side order processing.

Google Privacy Policy: <https://policies.google.com/privacy>

5.4 OpenAI (AI Assistant)

The conversational assistant Jules uses OpenAI's GPT model, via the Vern AI service (ws.vern.guide). Messages you send to Jules, the conversation identifier, and city metadata are transmitted to this service. Messages are not persisted and are lost when the Application is restarted.

OpenAI Privacy Policy: <https://openai.com/privacy>

5.5 Mapbox (Mapping)

Mapbox provides the interactive map in the Application. Geographic coordinates of activities are displayed on the map.

Mapbox Privacy Policy: <https://www.mapbox.com/legal/privacy>

5.6 ipwho.is (Geolocation)

Your IP address is sent to the ipwho.is service to determine your country and city in order to adapt the Application's content.

5.7 Expo / EAS (Build and Updates)

Expo and EAS manage the compilation and over-the-air (OTA) updates of the Application. Standard telemetry is collected.

Expo Privacy Policy: <https://expo.dev/privacy>

6. International Data Transfers

Some of our service providers (Stripe, Google, OpenAI, Mapbox, Expo) are established in the United States. Data transfers to the United States are governed by appropriate safeguards, such as the European Commission's Standard Contractual Clauses (SCCs) or the EU-U.S. Data Privacy Framework, where applicable.

7. Data Retention

- **Order data:** retained in Firebase Firestore for the duration necessary to manage the business relationship and comply with legal obligations (notably accounting and tax), for a maximum of 5 years after the last order.
- **Chat messages:** not persisted. Messages are stored in volatile memory (Zustand) and lost when the Application is restarted.
- **Device identifier:** stored locally on your device (AsyncStorage) until the Application is uninstalled.
- **Payment data:** managed and retained by Stripe in accordance with its own retention policy.

8. Data Storage and Security

We implement appropriate technical and organizational measures to protect your personal data:

- Payment data is processed exclusively by Stripe (PCI-DSS certified). The Application never stores your card numbers.
- Order data is hosted on Firebase Firestore (Google Cloud infrastructure) with encryption at rest and in transit.
- The device identifier is stored locally via AsyncStorage.
- The AI assistant does not retain conversation history between sessions.

9. No User Account

The Application does not offer user account creation. Your identification relies solely on an anonymous device identifier (UUID). Consequently, there is no account deletion procedure. However, you may exercise your rights regarding your personal data as described in Section 11 below.

10. Application Permissions

The Application may request the following permissions on your device:

- **Camera (iOS):** to scan QR codes.
- **Location While In Use (iOS):** to display nearby services.
- **Internet Access (Android):** for the general operation of the Application.
- **Storage (Android):** for reading and writing necessary files.

These permissions are requested only when necessary for the relevant feature. You can manage them at any time in your device settings.

11. Your Rights

Under the GDPR and applicable French data protection law, you have the following rights regarding your personal data:

- **Right of access:** obtain a copy of your personal data.
- **Right to rectification:** correct inaccurate or incomplete data.
- **Right to erasure:** request the deletion of your data, subject to legal retention obligations.
- **Right to restriction of processing:** restrict the processing of your data in certain circumstances.
- **Right to data portability:** receive your data in a structured, commonly used, and machine-readable format.
- **Right to object:** object to the processing of your data based on legitimate interest.

To exercise these rights, contact us at: contact@privategallery.fr

You also have the right to lodge a complaint with the French data protection authority (CNIL): www.cnil.fr.

12. Children's Privacy

The Application is not intended for children under 16 years of age. We do not knowingly collect personal data from minors. If you are a parent or legal guardian and believe your child has provided personal data to us, please contact us at contact@privategallery.fr so that we can proceed with its deletion.

13. Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time. Any changes will be published within the Application and will take effect upon publication. The date of the last update is indicated at the top of this document. We encourage you to review this page regularly.

14. Contact

For any questions regarding this Privacy Policy or your personal data, you may contact us:

By email: contact@privategallery.fr

By mail: Private Gallery Group SAS — 1 Place Paul Verlaine, 92100 Boulogne-Billancourt, France

Via our website: <https://www.vern.guide>