

Privacy Policy — Pulse

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Version: 1.0

1. Identity of the Data Controller

Application Pulse (*Pulse - Thinking of You*) is published by:

Thibault Lamour

Sole Proprietor (Micro-entreprise)

19 route des Aulnays,

50330 Gonneville-Le Theil, France

SIRET: 883 011 280 00012

Contact: help@usepulse.me

As the data controller within the meaning of Regulation (EU) 2016/679 (GDPR), I am responsible for the collection and use of your personal data in connection with the Pulse application.

2. Scope

This Privacy Policy applies to:

- The Pulse mobile application (iOS and Android)
- The website usepulse.me
- Any related service operated under the Pulse brand

It applies to all users, whether they reside in the European Union or elsewhere. Users located in the EU/EEA benefit from the enhanced protections provided by the GDPR.

3. Minimum Age Requirement

Pulse is accessible to anyone aged at least **13 years old**. In accordance with Article 8 of the GDPR, users residing in the European Union must be at least **16 years old** to use Pulse without the consent of a parent or legal guardian (or the minimum age set by applicable national law if lower than 16 in their country of residence).

If we become aware that a user is under 13 years of age (or the applicable minimum age), we will immediately delete their account and all associated data.

4. Data Collected

4.1 Data You Provide Directly

Data	Purpose	Legal Basis
Phone number	Authentication, contact matching	Performance of contract (Art. 6.1.b GDPR)
First name	Display in the app, notifications	Performance of contract (Art. 6.1.b GDPR)
Profile photo	Display in the app and widget	Performance of contract (Art. 6.1.b GDPR)

4.2 Automatically Collected Data

Data	Purpose	Legal Basis
Push notification token	Sending Pulse notifications	Performance of contract (Art. 6.1.b GDPR)
Anonymized usage events	Product improvement (internal analytics)	Legitimate interest (Art. 6.1.f GDPR)
Pulse send/receive timestamps	Service operation	Performance of contract (Art. 6.1.b GDPR)

4.3 Data from Your Address Book

When you use the contact matching feature, Pulse accesses your device's address book.

Phone numbers are never transmitted to our servers in plain text. They are transformed into irreversible cryptographic fingerprints (SHA-256 hashes) on your device before transmission. These fingerprints are used to identify Pulse users among your contacts, without ever exposing the actual phone numbers.

These fingerprints are **not stored** on our servers beyond the time required for the matching operation (real-time processing, not persisted).

4.4 What We Do Not Collect

- Content of communications between users (Pulse transmits signals only, not messages)
 - Precise geographic location
 - Web browsing data
 - Advertising identifiers (IDFA/GAID)
 - Biometric data
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5. Purposes and Legal Bases for Processing

Purpose	GDPR Legal Basis
Account creation and management	Performance of contract (Art. 6.1.b)
Sending and receiving pulses	Performance of contract (Art. 6.1.b)
Contact matching	Performance of contract (Art. 6.1.b)
Sending push notifications	Performance of contract (Art. 6.1.b)
Internal product analytics	Legitimate interest (Art. 6.1.f) — service improvement
Abuse and fraud prevention	Legitimate interest (Art. 6.1.f)
Compliance with legal obligations	Legal obligation (Art. 6.1.c)
Processing rights exercise requests	Legal obligation (Art. 6.1.c)

6. Data Recipients — Sub-processors

Your data is processed by the following sub-processors, with whom GDPR-compliant data processing agreements (DPAs) are in place or applicable by virtue of their policies:

Sub-processor	Role	Country	Safeguards
OVH	Database (PostgreSQL), backend hosting, internal dashboard	Canada	EU Standard Contractual Clauses (SCCs)
Cloudflare R2	Profile photo storage	United States / EU	EU Standard Contractual Clauses (SCCs)
Twilio Verify	Phone number verification (OTP)	United States	EU Standard Contractual Clauses (SCCs)
Expo (Expo Push Notifications)	Push notification routing	United States	EU Standard Contractual Clauses (SCCs)
Apple (APNs)	iOS notification delivery	United States	Adequacy / SCCs
Vercel	Website and dashboard hosting	United States	EU Standard Contractual Clauses (SCCs)

Transfers Outside the EU/EEA

Some of our sub-processors are established in the United States. These transfers are governed by **Standard Contractual Clauses (SCCs)** adopted by the European Commission, in accordance with Article 46 of the GDPR. You may obtain a copy of these safeguards by contacting us at the address listed in Section 1.

We never sell, rent, or share your personal data with third parties for commercial or advertising purposes.

7. Data Retention

Data	Retention Period
Account data (first name, photo, hashed phone number)	Until account deletion, + 30 days to handle potential claims
Pulse history	Until account deletion
Push notification token	Until account deletion or permission revocation
Analytics events	Rolling 24 months
Technical logs	30 days
Data after account deletion	Permanently deleted within 30 days, unless a legal retention obligation applies

In the event of a legal obligation (litigation, judicial requisition), certain data may be retained beyond these periods strictly within the limits required by applicable law.

8. Your Rights

Under the GDPR (Articles 15 to 22), you have the following rights:

Right of Access (Art. 15) — Obtain a copy of your personal data that we hold.

Right to Rectification (Art. 16) — Correct inaccurate or incomplete data (accessible directly in the app's Settings).

Right to Erasure (Art. 17) — Request deletion of your data. You can delete your account directly from Settings → Delete my account. Deletion is effective within 30 days.

Right to Restriction of Processing (Art. 18) — Request temporary suspension of the processing of your data in certain cases provided for by the GDPR.

Right to Data Portability (Art. 20) — Receive your data in a structured, machine-readable format, applicable to processing based on contract or consent.

Right to Object (Art. 21) — Object to processing based on our legitimate interest (including internal analytics).

Right Not to Be Subject to Automated Decision-Making (Art. 22) — Pulse does not make any automated decisions producing legal effects or significantly affecting you.

Right to Withdraw Consent — Where processing is based on your consent, you may withdraw it at any time, without affecting the lawfulness of prior processing.

How to Exercise Your Rights

Send your request to: help@usepulse.me

We will respond within **one month** of receiving your request. This period may be extended by two additional months in the case of complex or numerous requests, in which case you will be notified.

We may ask you to verify your identity before processing your request.

Right to Lodge a Complaint

If you believe that the processing of your personal data does not comply with applicable regulations, you have the right to lodge a complaint with the competent supervisory authority:

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

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

www.cnil.fr

Users residing in another EU Member State may also contact the supervisory authority of their country of residence.

9. Data Security

We implement appropriate technical and organizational measures to protect your data against unauthorized access, loss, accidental destruction or disclosure, including:

- Encrypted communications (HTTPS/TLS)
- Irreversible hashing of phone numbers (SHA-256)
- Time-limited JWT authentication tokens
- Data access restricted to systems strictly necessary for service operation
- Data isolation between users

In the event of a data breach likely to result in a risk to your rights and freedoms, we will notify the CNIL within 72 hours in accordance with Article 33 of the GDPR, and will inform you without undue delay if the risk is high (Art. 34 GDPR).

10. Cookies and Similar Technologies

The Pulse mobile application does not use cookies.

The website usepulse.me may use strictly necessary technical cookies for its operation. No advertising or third-party tracking cookies are placed on this site.

11. Push Notifications

Sending push notifications requires your explicit permission via your device's permission system (iOS or Android). You may revoke this permission at any time in your device settings. Revocation does not affect your access to the service but will prevent you from receiving pulse alerts.

Your notifications transit through Expo Push Notification servers, then through Apple's infrastructure (APNs) for iOS or Google's (FCM) for Android. Notification content is limited to the necessary information (sender's first name, pulse type).

12. Account and Data Deletion

You can delete your account at any time from **Settings** → **Delete my account**. This action results in:

- Deletion of your profile (first name, photo, hashed phone number)
- Deletion of all pulses sent and received
- Deletion of all your friendship connections
- Invalidation of your push notification token

Effective deletion occurs within **30 days** of your request. During this period, your account is deactivated and inaccessible. After this deadline, no recovery is possible.

Certain data may be retained beyond this period if a legal obligation requires it (for example, in the event of ongoing litigation or a judicial requisition).

13. Changes to This Policy

We reserve the right to modify this Privacy Policy at any time. In the event of a substantial change affecting your rights, you will be notified via an in-app notification at least **30 days before** the new provisions take effect.

The date of last update is indicated at the top of this document. The current version is always accessible at usepulse.me/privacy.

Continued use of the application after the changes take effect constitutes acceptance of the updated version.

14. Contact

For any questions regarding this policy or the protection of your personal data:

Email: help@usepulse.me

Postal address: Thibault Lamour, 19 route des Aulnays, 50330 Gonneville-Le Theil, France

We are committed to responding to any request within a maximum of **30 days**.

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Drafted in compliance with Regulation (EU) 2016/679 (GDPR), the French Data Protection Act (loi n° 78-17 of January 6, 1978, as amended), and the guidelines of the European Data Protection Board (EDPB).