

PRIVACY POLICY

Last updated: June 22, 2026

Welcome to our photo editing application. We are Tasmanic Editions S.A.S., registered in France (SIREN: 794114934), located at 91 Rue du Faubourg Saint-Honoré, 75008 Paris, FRANCE.

This policy describes how we collect, use, process, and share information when you use **Make it PRO** on your mobile device.

If you have any concerns about this privacy policy, you should not use this app.

1. Age Requirements

THIS SERVICE IS NOT MEANT FOR PEOPLE UNDER 16. We do not knowingly collect information from children under the age of 16. If we receive a valid notice through dpo@tasmanic.com that a minor under the age of 16 has provided us with personal information, we will take measures to delete it as soon as possible.

2. Why Do We Collect Data?

We and our partners collect and process data for the following specific purposes:

- **Core Functionality:** To process and enhance your photos using Artificial Intelligence models.
- **Subscription Management:** To manage and validate your premium access or subscriptions via our servers.
- **Internal Analytics:** To monitor app performance and improve our features anonymously.
- **Marketing & User Acquisition:** To run and optimize advertising campaigns so new users can discover our app.

3. Data That May Be Collected & Retention Periods

Technical Account Identifier

- **What:** We automatically generate a unique, non-reversible technical identifier linked to your device or account store.
- **Why:** Necessary on our servers to manage, verify, and restore your subscription status.
- **Retention:** We retain this identifier while needed to provide the service, manage credits and subscriptions, prevent abuse, and comply with legal or security obligations.

Photos & Face Data

- **How we collect it:** Data is collected only when you explicitly and manually select and upload a photo from your device into the App.
- **What we collect:** We collect the 2D images you submit. If your images contain human faces, this constitutes 2D face data. We do not collect biometric data, facial landmarks, or use TrueDepth API.
- **Why (All uses):** Photos and any included face data are used solely to apply the requested AI visual enhancements. We do not use this data to personally identify individuals. Your photos are sent securely to our processing servers and processed via third-party AI APIs provided by OpenAI.
- **Retention:** Photos (and any associated face data) are kept on our secure servers and by OpenAI for a maximum of 30 days for debugging, trust, and safety purposes. After this 30-day period, they are automatically and permanently deleted, unless a longer retention period is required by law. They are never used to train our AI models or those of our partners.

Analytics Data

- **What:** App usage behavior (features used, screens visited) and your IP address.
- **Why:** Internal analytics hosted on our own servers.
- **Privacy protection:** By default, if you choose to opt-out, your IP address is immediately **truncated/anonymized** (e.g., [192.168.xxx.xxx](#)) within Matomo, preventing any personal identification.

Advertising Identifiers

- **What:** Mobile advertising IDs (such as Apple's IDFA or Google GAID).
- **Why:** Used to measure the effectiveness of our marketing campaigns on external ad networks.

4. Data Controller & Data Processors (Third-Party Partners)

Data Controller

Tasmanic Editions S.A.S. acts as the **Data Controller** for the processing of your personal data collected through the app. We determine the purposes and means of the data processing.

Data Processors (Our Sub-contractors)

We use carefully selected Data Processors who process data strictly on our behalf. **We confirm that any third party the App shares user data with (including our AI provider) provides the same or equal protection of user data as stated in this Privacy Policy and required by applicable laws.**

- **OpenAI:** They act as data processors to perform the AI photo editing tasks. Your photos are sent via their secure APIs and are never used to train their foundational models. Please note that OpenAI may temporarily retain the images on their secure servers for up to 30 days strictly for trust, safety, and abuse monitoring purposes, after which they are permanently deleted, unless a longer retention period is required by law.
- **Tenjin, Inc.:** Our mobile measurement and attribution partner. Tenjin analyzes which ad campaigns led to app installations and tracks aggregated post-install events.
- **Matomo:** Self-hosted or strictly managed on our servers for privacy-friendly analytics.
- **Web Hosting & Cloud Providers (e.g., Gandi, AWS):** Securely host our servers and infrastructure where your technical unique identifier is processed.

Joint / Independent Data Controllers (Advertising Partners)

For marketing, user acquisition, and ad campaign measurement, we work with third-party networks:

- **Facebook (Meta), Google Ads, and TikTok:** When you consent to tracking, these partners process your mobile advertising identifier (IDFA/GAID) to show you relevant ads and measure campaign success. They may process this data as independent or joint controllers according to their own privacy policies.

5. International Data Transfers (Outside the EEA)

As we use services based in the United States (such as OpenAI, Google, Meta, and TikTok), your personal data (including technical identifiers, advertising IDs, and photos submitted for processing) may be transferred to, and processed in, the United States.

To ensure your data remains protected when leaving the European Economic Area (EEA), we rely on the following legal mechanisms:

- **EU-U.S. Data Privacy Framework (DPF):** For entities certified under this framework (such as Google LLC and Meta Platforms, Inc.), the European Commission has determined that they provide an adequate level of protection for personal data.
- **Standard Contractual Clauses (SCCs):** For partners or transfers not fully covered by an adequacy decision, or as a backup safeguard, we ensure that Standard Contractual Clauses approved by the European Commission are signed to contractually bind the recipient to European data protection standards.

6. Consent & Opt-Out Management (CMP & Apple ATT)

Your privacy is under your strict control. We use a two-step consent mechanism at the first launch of the application and provide ongoing controls within the app settings:

First Launch Consent (CMP & ATT)

1. **Custom CMP (Consent Management Platform):** Upon opening the app for the first time, our custom consent screen will ask for your explicit permission regarding analytics tracking (Matomo) and advertising/attribution processing (Tenjin, Facebook, Google, TikTok).
2. **Apple ATT (App Tracking Transparency):** Following your choice on our consent screen, iOS users will see the native Apple ATT prompt.

How to Change Your Preferences Anytime

You can modify or withdraw your consent at any time directly inside the application:

1. Open the **Settings / Menu** on the main page.
2. Select **Privacy Settings**.
3. **Advertising & Attribution Control:** Toggle this to **"Off"** to instantly stop sharing your advertising identifier with Facebook, Google, TikTok, and Tenjin.
4. **Analytics Control:** Toggle this to **"Off"** to force Matomo to truncate your IP address and stop tracking your behavioral usage.

7. GDPR - Your European Rights

If you are located in the European Economic Area (EEA), you have the following rights under the GDPR:

- **Right to access, rectify, or delete** your unique technical identifier and related data.
- **Right to withdraw consent** at any time via the in-app Privacy Settings.
- **Right to lodge a complaint** with a supervisory authority, such as the **CNIL** in France.

To exercise these rights, contact us at dpo@tasmanic.com.

8. US State Privacy Rights (CCPA / CPRA)

This section applies to residents of California and other US states with active privacy laws.

Do Not Sell or Share My Personal Information

Under the CCPA, sharing your mobile identifier with ad networks (Facebook, Google, TikTok) for cross-context behavioral advertising is considered "sharing" or "selling" data. You have the right to opt-out. You can exercise this right at any time by clicking "**Your Privacy Choices**" in the account tab, and opting out of Tracking and Marketing. We do not otherwise sell your personal data.

Automated Decision-Making & AI Notice

We use Artificial Intelligence technology provided by OpenAI strictly to perform the image alterations you request. This process does not involve automated decision-making that produces legal or similarly significant effects on you.

Table of Categories Collected (Past 12 Months)

CCPA Category	Examples	Source	Purpose
Identifiers	Account ID, IP Address, Ad Identifiers	App installation, Device	Subscription management, Ad tracking
Commercial Info	Subscription history (no credit cards)	App Store / Play Store	Managing premium features
Internet/Network Activity	App clicks, sessions, photos processed (stored for a maximum of 30 days for debugging)	Your activity in the app	AI Photo editing, Matomo analytics
Geolocation	Country, State (derived from IP)	IP address	App localization & stats

9. How to Contact Us

For general questions: contact@tasmanic.com

For privacy requests or Data Protection Officer: dpo@tasmanic.com

Postal Address:

Tasmanic Editions

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