

# SafouAI-Hôtel — Privacy Policy

**Last updated:** September 8, 2025

This Privacy Policy explains how **SafouAI Sàrl** (IDE/UID: **CHE-255.788.687**), Route de Tercier 2, **1807 Blonay**, Switzerland (“**SafouAI**”, “**we**”) collects and processes personal data in connection with our web application and related services (the “**Service**”). This Policy complies with the **Swiss FADP** and, where applicable, the **EU/EEA GDPR** and **UK GDPR**.

**Contact:** [contact@safouai.com](mailto:contact@safouai.com)

## 1) Who we are & roles

- **Controller.** For personal data about your organization’s users (account holders, admins) and website visitors, SafouAI is the **data controller**.
- **Independent controllers.**
  - **Stripe** processes payments and related fraud-prevention data as an **independent controller**.
  - **Google** provides OAuth/OIDC authentication as an **independent controller**. We do not receive your full card numbers or your Google password.

## 2) What we collect

1. **Account & Contact Data** – name, work email, role, organization, password hashes, authentication tokens, preferences.
2. **OAuth Sign-in Data (Google)** – OIDC `sub` (identifier), email, display name, profile image URL (if provided), tenant/domain, sign-in timestamps; we may store OAuth tokens (access/refresh or ID token claims) to maintain sessions. Scopes used: `openid`, `email`, `profile`.
3. **Billing & Payment Data** – billing contact, company identifiers (e.g., VAT/IDE/UID), transaction details, last-4 and card brand, expiry month/year, billing address, payment status, refunds/chargebacks. **Full card numbers go directly to Stripe, not to us.**
4. **Service Usage & Log Data** – app interactions, configuration (e.g., Market Location, Tracked Hotels List), timestamps, IP address, device/browser info, cookies/SDK IDs, diagnostic logs, crash reports.
5. **Support & Communications** – helpdesk emails, chat transcripts, feedback, attachments.
6. **Marketing (Optional)** – newsletter opt-ins, campaign metrics, event sign-ups.
7. **Public-Web Content surfaced in the Service** – links/extracts of **public** information (e.g., events, competitor offers). This is not your users’ personal data.

We **do not seek** end-guest personal data and the Service operates **without** it. If you upload any personal data, you must have a lawful basis.

## 3) Purposes & legal bases

**Purposes:** provide and operate the Service (authentication, configuration, dashboards, alerts); **payments & billing** (via Stripe); customer support; security and integrity; improvement and

analytics; legal compliance; and **marketing** (optional/consent-based).

**Legal bases (GDPR/UK GDPR when applicable): contract** (service, payments), **legitimate interests** (platform security, product improvement, B2B marketing with easy opt-out), **consent** (non-essential cookies/analytics, newsletters), and **legal obligation** (tax/accounting).

Under **FADP**, we process in line with proportionality, purpose limitation, and data security, relying on contract, consent, legal obligation, and overriding private interests.

## 4) Cookies & tracking

- **Strictly necessary cookies** (login/session security; Google/Stripe may set necessary cookies during auth/checkout).
  - **Functional/Preference cookies** (remember settings).
  - **Analytics cookies/SDKs** (aggregate usage/performance—used only with a valid basis, consent where required).
- You can manage cookies via your browser and our banner. Blocking essential cookies (incl. some Google/Stripe cookies) may prevent login or payment.

## 5) Sharing & recipients

- **Payments: Stripe** (independent controller) receives order/billing metadata; Stripe collects card data and anti-fraud/device signals directly.
  - **Authentication: Google** (independent controller) provides identity assertions and may process anti-abuse signals.
  - **Hosting & infrastructure: Hetzner Online GmbH** (VPS, primary compute/storage).
  - **Email/support tools, security/monitoring, analytics (if enabled), professional advisors.**
  - **Corporate transactions** (under confidentiality).
  - **Law enforcement/regulators** if required by law.
- We do **not** sell personal data.

## 6) Data location & international transfers

We process and store data primarily in the **European Union (Germany)** at **Hetzner's Nuremberg datacenter**. Support services may involve Switzerland/EEA/UK. If data is transferred outside these areas, we use safeguards such as **EU Standard Contractual Clauses (SCCs)** with Swiss/UK addenda as needed. **Google** and **Stripe** operate globally and rely on their own transfer mechanisms.

## 7) Security

We implement appropriate technical and organizational measures: encryption in transit/at rest, least-privilege access, MFA for admin systems, audit logging, backups, vulnerability management. **Stripe** is PCI-DSS compliant for card processing. No system is 100% secure.

## 8) Retention

- **Account data:** life of account, then typically **12–24 months** for logs/records.

- **Payment/billing:** per Swiss law (~10 years).
- **Support records:** typically **24 months** after closure.
- **Analytics:** typically **12–24 months** (then aggregated or de-identified).  
We may retain data longer if required by law or to establish/defend legal claims, then delete or irreversibly de-identify it.

## 9) Your rights

Subject to law and exemptions, you may **access, rectify, delete, restrict, object**, obtain **portability**, and **withdraw consent** (future effect). You may **complain** to a supervisory authority (Switzerland: FDPIC; EU/EEA: your local DPA; UK: ICO).

**How to exercise:** [contact@safouai.com](mailto:contact@safouai.com). For payment/authentication data, you may also contact **Stripe/Google** directly.

## 10) Children

The Service is B2B and not directed to minors.

## 11) Automated decision-making

We do not conduct automated decision-making producing legal or similarly significant effects about individuals.

## 12) Third-party sites

The Service links to third-party websites and public sources. Their privacy practices are governed by their own policies.

## 13) Changes to this Policy

We may update this Policy. Material changes will be notified in-app or by email. Continued use after the effective date signifies acceptance.

## 14) Contact us

**SafouAI Sàrl** (IDE/UID: **CHE-255.788.687**)  
Route de Tercier 2, **1807 Blonay**, Switzerland  
**Email:** [contact@safouai.com](mailto:contact@safouai.com)

### Annex — Key Service Providers (summary)

- **Hetzner Online GmbH** — Infrastructure/hosting (VPS), Nuremberg (EU).
- **Stripe** — Payments (independent controller), global.
- **Google** — OAuth/OIDC authentication (independent controller), global.