gragra.eu

Privacy Policy

Artist website (Singulart Studio)

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Courtesy translation. This English version is provided for information only. The French version is the only legally binding version; in the event of any discrepancy, the French version prevails.

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1. Controllers

This website is published by **Graziano Gaddi**, whose full identity and postal address appear in this website's Legal Notice. It is created and hosted using services provided by Singulart SAS as part of the Singulart Studio product.

Depending on the data concerned:

- **Graziano Gaddi** is **the seller**: the sale of an artwork is concluded directly between you and them. They are the controller for the data relating to this commercial relationship (content of the contact form, order, purchase history).

- **Singulart SAS** acts as processor for the website's browsing and audience measurement data (see section 4): Graziano Gaddi remains the controller of this data, Singulart processing it only to provide and secure the website, under the Studio DPA (data processing agreement) concluded with Singulart Studio.
- **Stripe** processes the payment on behalf of Graziano Gaddi. Stripe also acts as an independent controller for what regulations require of it in its own right, in particular fraud prevention and its anti-money laundering obligations.
- **Customer.io** routes this website's emails (contact form message, order confirmation) as a processor.

The processing relationship between Graziano Gaddi and Singulart for the data of their visitors and buyers is governed by the Studio DPA (data processing agreement concluded between Graziano Gaddi and Singulart SAS), whose annex lists the relevant sub-processors (see section 5).

2. Data collected

2.1 Contact form

Your name, your email address, the subject and content of your message and, where applicable, the artwork from which you opened the form.

The message is routed by email to Graziano Gaddi through our email delivery provider **Customer.io**, with your address set as the reply-to address so that Graziano Gaddi can reply to you directly. The message is not stored in the Singulart Studio database. It remains viewable in Customer.io's sending log for the retention period set by that provider, and its subsequent retention is the responsibility of Graziano Gaddi, as recipient of the message.

2.2 Order data

Your name, your email address, your telephone number where applicable, your billing address, your delivery address and the name of the recipient where different from yours, as well as the language in which you ordered.

This information is collected by **Stripe** at the time of payment, then passed on to Singulart Studio, which **records it with the order** in order to issue the invoice and enable Graziano Gaddi to perform the sale. Your email address is also passed on to **Customer.io** to send the

order confirmation; Customer.io keeps this address together with the list of artists from whom orders were placed using it, so as to send each person only the messages that concern them.

2.3 Browsing data

For each page viewed, the following are recorded: the address of the page and the date of viewing, the address of the page or site from which you arrived and its domain name, any campaign parameters ("utm") present in the link you followed, an approximate country, your browser language, and the type of browser and device you use.

These page views are grouped by visit, a visit ending after thirty minutes of inactivity, which makes it possible to count visits and measure their duration.

The country is provided by our content delivery network, which infers it from your connection. **Your IP address is not recorded in any of this data.** None of this information is linked to your identity, passed on to a third party, or used for advertising or profiling purposes.

3. Legal bases and whether providing data is mandatory

Processing	**Legal basis**	**Provision of data**
Contact form	Performance of pre-contractual measures taken at your request, or legitimate interest of Graziano Gaddi in responding to the inquiries they receive (Art. 6(1)(b) and 6(1)(f) GDPR)	Necessary to send the message. Otherwise, the form cannot be submitted.
Order and invoicing	Performance of the sales contract (Art. 6(1)(b)) and legal accounting and tax obligation (Art. 6(1)(c))	Necessary to buy. Otherwise, the order cannot be placed.
Website audience measurement	Legitimate interest of Graziano Gaddi in knowing how much traffic their website receives (Art. 6(1)(f))	No action is expected from you.
Protection of the form against automated submissions	Legitimate interest in the security of the website (Art. 6(1)(f))	No action is expected from you.

Processing	Legal basis	Provision of data
Technical error reporting	Legitimate interest in the proper functioning of the website (Art. 6(1)(f))	No action is expected from you.
Technical performance measurement of pages	Your consent (Art. 6(1)(a))	Optional. Refusing has no consequence on your browsing.

4. Cookies

This website sets cookies that are strictly necessary for it to work, as well as two audience measurement cookies. The latter are **exempt from consent**: they are used solely to produce traffic statistics for Graziano Gaddi, can only be read on gragra.eu, do not allow you to be tracked from one website to another, and are neither cross-referenced nor used for advertising.

A consent banner is shown to visitors located in the European Economic Area, the United Kingdom, Switzerland and California. It covers only the trackers that require consent, currently the technical performance measurement tool described in the Cookie Policy. This banner is provided and displayed by Singulart Studio; Graziano Gaddi does not have to configure it.

Details of the cookies, their purposes and their durations are set out in this website's **Cookie Policy**.

5. Recipients and transfers outside the European Union

In addition to Graziano Gaddi, the following providers are involved in processing your data in connection with this website:

- **Amazon Web Services** (hosting of the website and data): European Union, Paris and Frankfurt regions. Pages and images are delivered through a content delivery network with points of presence worldwide.
- **Stripe** (payment processing): United States, under Standard Contractual Clauses and EU-US Data Privacy Framework certification.
- **Customer.io** (email routing: contact form message, order confirmation): European Union.

- **hCaptcha, Intuition Machines, Inc.** (protection of the contact form against automated submissions): United States.
- **SpeedCurve** (technical performance measurement of pages, only after your consent): United States.
- **Sentry** (reporting of technical errors occurring in your browser): European Union.

Transfers outside the European Union are governed by Standard Contractual Clauses and, where applicable, by EU-US Data Privacy Framework certification. The complete and up-to-date list of sub-processors is set out in the annex to the Studio DPA.

6. Retention periods

- **Order data:** kept for 10 years for accounting purposes (Article L123-22 of the French Commercial Code).
- **Messages received through the contact form:** not kept by Singulart Studio beyond their routing. Their retention is then the responsibility of Graziano Gaddi, as recipient of the message, and of our email provider's sending log.
- **Audience measurement data:** cookies expire after thirteen months at the latest, and the data is not kept beyond twenty-five months.

7. Your rights

Under the GDPR, you have the right of access, rectification, erasure, restriction of processing and portability of your data, and the right to set out instructions regarding what happens to it after your death.

You also have the **right to object** to any processing based on legitimate interest, on grounds relating to your particular situation, and the **right to withdraw your consent** at any time where the processing is based on it, without affecting the lawfulness of what was done before. For cookies, the "Cookies settings" link at the bottom of every page allows you to withdraw it at any time.

To exercise these rights:

- For the data held by Graziano Gaddi (contact message, order), write to contact@gragra.eu.

- For the data processed by Singulart (audience measurement, infrastructure), write to **privacy-studio@singulart.com**.

Finally, you have the right to lodge a complaint with a supervisory authority, in France the Commission nationale de l'informatique et des libertés (CNIL, 3 place de Fontenoy, TSA 80715, 75334 Paris Cedex 07, www.cnil.fr), or with the competent authority of your place of residence.

8. No automated decision-making

No decision producing legal effects concerning you, or similarly significantly affecting you, is taken on the basis of automated processing. This website carries out no profiling and builds no advertising profile.

9. Contact

For any question about this policy: contact@gragra.eu for matters concerning Graziano Gaddi, **privacy-studio@singulart.com** for matters concerning Singulart Studio.