

# PRIVACY POLICY

Naano SAS

Last Updated: January 27, 2026

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## Preamble

The purpose of this privacy policy is to inform you about the types of personal data we process, the purposes of such processing, and their scope. This policy applies to all processing of personal data carried out by Naano, in the context of providing our services, particularly on our online platform and external online presences, such as our social media profiles.

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## 1. Controller

Naano SAS  
84 Avenue du Roule  
92200 Neuilly-sur-Seine  
France

Email address:

jarrealexis00@gmail.com

Legal form: Société par Actions Simplifiée (SAS - Simplified Joint Stock Company)

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## 2. Overview of Processing Operations

The following summary presents the types of data processed, the purposes for which they are processed, and the data subjects concerned.

### Categories of Processed Data

- Identity Data (last name, first name, email address)
- Contact Data (email address, phone number)

- LinkedIn Profile Data (number of followers, professional qualification, public profile)
- Company Data (company name, industry sector, SIRET number if provided)
- Performance Data (clicks generated, conversions, campaign statistics)
- Financial Data (payment information via Stripe, Naano account balance, transaction history)
- Technical Data (IP address, connection data, timestamps)
- Usage Data (pages visited, features used, access times)

## **Categories of Data Subjects**

- Content Creators (LinkedIn micro-creators registered on the platform)
- Business Clients (companies wishing to increase their visibility through our services)
- Prospects (website visitors and persons interested in our services)
- Communication Partners (recipients of emails, letters, etc.)

## **Purposes of Processing**

- Provision and operation of our marketplace platform
- Connecting content creators with businesses
- Tracking and accounting for clicks generated by creators
- Calculating and managing performance-based compensation
- Payment processing and user account management
- Performance analysis and reporting of marketing campaigns
- Communication with users and customer support
- Service improvement and development of new features
- Compliance with our legal and accounting obligations

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## **3. Legal Bases for Processing**

In accordance with the General Data Protection Regulation (GDPR), we process your personal data on the following legal bases:

Consent (Article 6(1)(a) GDPR) - The data subject has given consent to the processing of their personal data for one or more specific purposes.

Performance of a Contract (Article 6(1)(b) GDPR) - Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Legitimate Interests (Article 6(1)(f) GDPR) - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

Legal Obligation (Article 6(1)(c) GDPR) - Processing is necessary for compliance with a legal obligation to which the controller is subject (particularly accounting and tax obligations).

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## 4. Transmission of Personal Data

In the context of processing your personal data, it may be transferred to other entities, companies, or persons, or disclosed to them. Recipients of your data may include service providers responsible for IT tasks or providers of services and content integrated into our platform.

In all cases, legal requirements will be respected, and appropriate contracts or agreements aimed at protecting your data will be concluded with the recipients.

## Service Providers Used

- Stripe: Payment processing and financial transaction management (Stripe, Inc., 510 Townsend Street, San Francisco, CA 94103, USA)

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## 5. Data Processing in Third Countries

Some of our service providers (particularly Stripe) may process data outside the European Union (EU) or the European Economic Area (EEA).

In accordance with legal requirements, we ensure that these transfers are made:

- To countries benefiting from an adequacy decision by the European Commission
- On the basis of appropriate safeguards, such as standard contractual clauses of the European Commission
- With your explicit consent when necessary

You may contact us (see "Contact Us" section) to obtain a copy of the appropriate safeguards for any transfer of data to third countries.

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## 6. Erasure of Data and Retention Periods

We retain your personal data only for the period necessary for the purposes for which they were collected, in accordance with GDPR requirements and CNIL (French Data Protection Authority) recommendations.

## Applicable Retention Periods

Active Accounts:

- Data is retained as long as your account remains active and you use our services

After Account Closure or Inactivity:

- Customer and creator data: 3 years after account closure or last interaction
- Accounting and tax data: 10 years (French legal obligation)
- Campaign performance data: 3 years after the end of the marketing campaign

Prospects and Communications:

- Prospects who did not follow up: 3 years after last contact
- Processed contact requests: 2 years after request resolution

Technical Data:

- Connection logs and technical data: 12 months maximum

Upon expiration of these periods, your data will be deleted or irreversibly anonymized, unless otherwise required by law.

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## 7. Provision of Online Services and Web Hosting

To provide our online services securely and efficiently, we use web hosting providers from whose servers our online services are accessible.

Data processed in the context of hosting services may include all information relating to users of our online services that is collected during use and communication. This regularly includes the IP address, which is necessary to deliver the content of our online services to browsers.

## Collection of Access Data and Log Files

We, or our web hosting provider, collect data on each access to the server (server log files). Server log files may include the address and name of web pages and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, user's operating system, referrer URL

(previously visited page), and, as a general rule, IP addresses and the requesting provider.

Server log files can be used for security purposes, e.g., to avoid server overload (especially in case of abusive attacks, so-called DDoS attacks) and to ensure stability and optimal load balancing of servers.

Types of Data Processed: Content data, usage data, technical data

Data Subjects: Users

Purposes: Provision of our online services and usability

Legal Basis: Legitimate Interests (Article 6(1)(f) GDPR)

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## 8. Contacting Us

When you contact us (by contact form, email, telephone, or via social media), the data of inquiring persons are processed to the extent necessary to respond to contact requests and requested actions.

The response to contact requests within contractual or pre-contractual relationships is made to fulfill our contractual obligations or to respond to (pre)contractual requests, and is otherwise based on legitimate interests in responding to requests.

Types of Data Processed: Contact data, content data

Data Subjects: Communication partners

Purposes: Contact requests and communication

Legal Basis: Performance of a contract (Article 6(1)(b) GDPR), Legitimate Interests (Article 6(1)(f) GDPR)

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## 9. Specific Services of the Naano Platform

### 9.1 Registration and Account Management

For Content Creators:

When you register as a creator, we collect:

- Your identity data (last name, first name, email address)
- Your LinkedIn profile (number of followers, professional qualification)
- Your banking details (via Stripe Connect) for payment of compensation

For Businesses:

When you register as a business client, we collect:

- Company identification data (name, industry sector)
- Representative's contact details (last name, first name, email)
- SIRET number (if provided)
- Payment methods (via Stripe)

Legal Basis: Performance of a contract (Article 6(1)(b) GDPR)

## 9.2 Click Tracking System and Performance-Based Compensation

Naano uses a proprietary click tracking system to measure content creators' performance. This system allows us to:

- Generate unique and secure tracking links for each creator
- Count actual clicks generated by creators' posts
- Verify click authenticity and prevent fraud
- Automatically calculate compensation owed to creators

Technical data collected during click tracking (IP address, timestamp, device) is processed in a pseudonymized manner and retained only to ensure the reliability of performance measurements.

Legal Basis: Performance of a contract (Article 6(1)(b) GDPR), Legitimate Interests (Article 6(1)(f) GDPR)

## 9.3 Payment and Withdrawal Management

Payments on the Naano platform are managed via Stripe and Stripe Connect:

For Businesses:

- Marketing campaign payments are processed via Stripe
- Payment information is securely stored by Stripe

For Creators:

- Compensation is credited to your Naano account after validation of generated clicks
- You can withdraw your earnings once the minimum threshold of €50 is reached
- Withdrawals are made via Stripe Connect to your bank account

Naano never directly stores your complete banking details. This sensitive information is managed exclusively by Stripe, which is PCI-DSS compliant.

Legal Basis: Performance of a contract (Article 6(1)(b) GDPR)

## 9.4 Performance Analysis and Reporting

Naano provides business clients with detailed analysis of their marketing campaign performance, including:

- Number of clicks generated per creator
- Conversion and engagement rates
- Aggregated reach and visibility statistics

This data allows businesses to evaluate the return on investment of their campaigns and optimize their marketing strategies.

Creators also have access to their own performance statistics via their personal dashboard.

Legal Basis: Performance of a contract (Article 6(1)(b) GDPR), Legitimate Interests (Article 6(1)(f) GDPR)

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## 10. No Marketing Cookies

Naano currently does not use any marketing, analytics, or advertising cookies.

We only use cookies strictly necessary for the technical operation of the platform (session cookies, authentication cookies). These essential cookies do not require prior consent in accordance with CNIL guidelines.

If we use non-essential cookies in the future, we will implement a GDPR-compliant consent management system and inform you in advance.

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## 11. Profiles on Social Networks (Social Media)

We maintain online presences on social networks and process user data in this context to communicate with active users or to provide information about our services.

We would like to point out that user data may be processed outside the European Union. This may entail risks for users, such as making it more difficult to enforce their rights.

In addition, user data is generally processed within social networks for market research and advertising purposes. For example, user profiles can be created based on user behavior and their associated interests. These profiles can then be used to

display advertisements inside and outside the networks that presumably correspond to users' interests.

Social Networks Used:

- LinkedIn: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland
- Instagram: Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland
- Twitter/X: X Corp., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA

Types of Data Processed: Contact data, content data, usage data

Data Subjects: Users

Purposes: Contact requests and communication, marketing

Legal Basis: Legitimate Interests (Article 6(1)(f) GDPR)

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## 12. Changes and Updates to the Privacy Policy

We invite you to regularly inform yourself about the content of our privacy policy. We will adjust the privacy policy as soon as changes in our data processing practices make this necessary. We will inform you as soon as the changes require your cooperation (e.g., consent) or other individual notification.

If we provide addresses and contact information of companies and organizations in this privacy policy, please note that addresses may change over time and verify the information before contacting us.

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## 13. Rights of Data Subjects

As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Articles 15 to 21 of the GDPR:

### Right to Object (Article 21 GDPR)

You have the right, on grounds arising from your particular situation, to object at any time to the processing of your personal data which is based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions. Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.

## **Right to Withdraw Consent (Article 7(3) GDPR)**

You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

## **Right of Access (Article 15 GDPR)**

You have the right to obtain confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and additional information about the processing.

## **Right to Rectification (Article 16 GDPR)**

You have the right to obtain the rectification of inaccurate personal data concerning you and to have incomplete personal data completed.

## **Right to Erasure ("Right to be Forgotten") (Article 17 GDPR)**

You have the right to obtain the erasure of your personal data in the cases provided by law, particularly when the data are no longer necessary in relation to the purposes for which they were collected.

## **Right to Restriction of Processing (Article 18 GDPR)**

You have the right to obtain restriction of processing in the cases provided by law, particularly when you contest the accuracy of the data or when the processing is unlawful.

## **Right to Data Portability (Article 20 GDPR)**

You have the right to receive the personal data concerning you, which you have provided, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller.

## **Right to Lodge a Complaint with a Supervisory Authority (Article 77 GDPR)**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement.

In France, the competent supervisory authority is:

Commission Nationale de l'Informatique et des Libertés (CNIL)  
3 Place de Fontenoy  
TSA 80715  
75334 Paris Cedex 07  
France  
Phone: +33 (0)1 53 73 22 22  
Website:

<https://www.cnil.fr>

## **Exercising Your Rights**

To exercise your rights, please contact us at:

Email:

jarrealexis00@gmail.com

Postal Address: Naano SAS, 84 Avenue du Roule, 92200 Neuilly-sur-Seine, France

We are committed to responding to your request within one month of receipt. This period may be extended by two months if necessary, taking into account the complexity and number of requests. We will inform you of such extension within one month of receipt of your request.

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## **14. Data Security**

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, in accordance with Article 32 of the GDPR. These measures include:

- Encryption of sensitive data in transit and at rest
- Pseudonymization of data where possible
- Strict access controls to personal data
- Regular monitoring of the security of our systems
- Training of our staff in data protection best practices
- Data backup and recovery procedures

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## **15. Terminology and Definitions**

**Personal Data:** Any information relating to an identified or identifiable natural person ("data subject"). An "identifiable natural person" is one who can be identified, directly or indirectly.

**Controller:** The natural or legal person, public authority, service, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Processing:** Any operation or set of operations performed on personal data or on sets of personal data, whether or not by automated means.

**Consent:** Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

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## **16. Contact for Data Protection Questions**

For any questions regarding the processing of your personal data or this privacy policy, you may contact us at:

Naano SAS  
84 Avenue du Roule  
92200 Neuilly-sur-Seine  
France

Email:

[jarrealexis00@gmail.com](mailto:jarrealexis00@gmail.com)