

WORKING DRAFT - PUBLICATION CONTROL: This document is drafted for the RedTree launch. Do not publish until the Global Compliance Matrix confirms the related launch implementation. Any text marked 'TBD BEFORE PUBLICATION' must be resolved and removed before release.

1. Scope

This Appendix supplements the Global Privacy Policy for individuals in the European Union and European Economic Area. SIMG SASU is established in France and acts as controller for the RedTree processing described in the Global Privacy Policy.

2. GDPR legal bases

Purpose	Primary GDPR basis
Account creation, authentication and requested RedTree functions	Article 6(1)(b) - performance of the contract / steps requested by the user.
Storage, sync, backup, AI or transcription deliberately requested by the user	Article 6(1)(b), with consent used where a separate consent is legally required for a specific processing operation.
Subscription/payment administration	Article 6(1)(b); Article 6(1)(c) for legal/accounting obligations.
Service security, abuse prevention and necessary diagnostics	Article 6(1)(f) legitimate interests, balanced against user rights; Article 6(1)(c) where a legal obligation applies.
Tax, accounting, regulatory and legal claims	Article 6(1)(c) and/or Article 6(1)(f), as applicable.

RedTree does not rely on consent merely because an app permission is requested. Where consent is used as the GDPR legal basis, it may be withdrawn without affecting processing lawfully carried out before withdrawal.

3. Special-category data

RedTree is a general-purpose information tool. Users may nevertheless choose to place sensitive or special-category information in their content. SIMG does not use such content for advertising or independent profiling. Where RedTree itself must process special-category data and Article 9 GDPR applies, an appropriate Article 9 condition must be identified before that processing is enabled.

4. Recipients and processors

The technical recipients/processors are described in the Global Privacy Policy, including Google/Firebase, OpenAI, Stripe, PayPal, Google Drive when initiated by the user, Android/Google speech recognition and Hostinger for the public website. These disclosures are for service delivery, not independent marketing.

5. International transfers

Where personal data is transferred outside the EEA, SIMG uses an applicable GDPR Chapter V mechanism, such as an adequacy decision or appropriate safeguards including Standard Contractual Clauses where required. The internal processor/transfer register must identify the final mechanism for each production provider.

TBD BEFORE PUBLICATION: confirm Firestore/Storage regions and final OpenAI/other subprocessor transfer paths before completing the published transfer summary.

6. GDPR rights

- Access personal data and obtain information about its processing.
- Correct inaccurate personal data.
- Request erasure where Article 17 conditions are met.
- Restrict processing where Article 18 applies.
- Receive applicable data in a portable format under Article 20.
- Object to processing based on legitimate interests under Article 21.
- Withdraw consent where consent is the legal basis.
- Lodge a complaint with a competent EEA supervisory authority.

Requests may be submitted through the RedTree Data Rights page or contact@thesimg.com. SIMG may verify identity where reasonably necessary.

7. Automated decision-making

RedTree AI provides assistance, analysis and generated output. RedTree does not currently use AI to make decisions producing legal effects or similarly significant effects about users without meaningful human/user involvement. If that changes, the Privacy Policy and required safeguards will be updated first.

8. Retention

The Global Retention & Deletion Policy applies. SIMG applies storage limitation, legal-retention exceptions and the validated rule that cancellation/downgrade does not itself delete user data.

9. Supervisory authority

As SIMG SASU is established in France, the French supervisory authority is the Commission nationale de l'informatique et des libertés (CNIL). Depending on the circumstances, individuals may also lodge a complaint with the supervisory authority in the Member State of their habitual residence, place of work or alleged infringement.

TBD BEFORE PUBLICATION: this reasoning must be re-examined before any capability under gate G-AX is released, since it rests on AI features not running in the background.