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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 Do not publish until the Global Compliance Matrix confirms the related launch implementation.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 and launch status

This India Privacy Appendix supplements the Global Privacy Policy for RedTree users in India. RedTree's initial India launch is a free pilot with no paid subscription offer.

India's Digital Personal Data Protection Act, 2023 and Digital Personal Data Protection Rules, 2025 have staged commencement. This Appendix must be reviewed immediately before publication and again as additional provisions enter into force.

2. Data Fiduciary

For the purposes of applicable Indian data-protection law, SIMG SASU is the entity determining the purposes and means of RedTree processing. Contact: contact@thesimg.com | +33 (0)1 59 58 01 53.

3. Personal data and purposes

RedTree processes the categories described in the Global Privacy Policy, including account data, user content, AI context, connected-service data and necessary security/technical records, only for specified service, security, legal and user-requested purposes.

4. Consent and user choice

Where Indian law requires consent, RedTree will request free, specific, informed and unambiguous affirmative consent for the specified purpose and provide a mechanism to withdraw consent with comparable ease. Withdrawal does not affect processing already lawfully carried out and may affect a feature that cannot operate without the relevant data.

5. Processors and cross-border services

RedTree uses technical processors/service providers identified in the Global Privacy Policy, including Google/Firebase, OpenAI and optional Google Drive. These disclosures are for service delivery and not for advertising, sale or unrelated independent use.

6. User rights and grievance route

RedTree provides routes for access/export, correction, deletion and complaints through the Data Rights page and contact@thesimg.com. As DPDP provisions enter into force, RedTree will implement the statutory rights and grievance mechanisms then applicable, including any prescribed format/timing requirements.

7. Security and breach handling

RedTree uses HTTPS/TLS for network communications and the security controls described in the Global Privacy Policy. The internal incident-response procedure must be aligned with any DPDP breach-notification and security-safeguard rules as they become effective.

8. Retention

The Global Retention & Deletion Policy applies. India-specific statutory minimum retention or log requirements will be incorporated when the relevant DPDP Rules become effective and if they apply to RedTree's category/scale.

TBD COMPLIANCE MILESTONE: Rule 4 is scheduled to commence one year after publication of the 2025 Rules; Rules 3, 5-16, 22 and 23 are scheduled to commence eighteen months after publication. Revalidate this Appendix before those dates and before any India paid launch.

9. Adults only

RedTree is intended for users aged 18 or over. It is not offered as a service for children.

Grievance Officer

Under the Digital Personal Data Protection Act, users in India may raise a grievance with the Grievance Officer designated by SIMG SASU.

Grievance Officer: Barthélemy Gilles, President, SIMG SASU.

Contact: contact@thesimg.com | +33 (0)1 59 58 01 53

Postal address: SIMG SASU, 37 avenue du Roule, 92200 Neuilly-sur-Seine, France.

Grievances are acknowledged and answered within the periods required by applicable law. Where a user is not satisfied with the outcome, they may refer the matter to the Data Protection Board of India.

TBD BEFORE PUBLICATION: the staged commencement of the DPDP Act must be re-checked close to the publication date. Should India become a paid market, the appointment of a local point of contact should be reviewed with Indian counsel.