

PRIVACY POLICY

CallOnAlarm.io
Version 2.0 — February 2026

This document is a translation. In case of discrepancy in interpretation, the French version shall prevail, subject to mandatory consumer protection provisions of the User's country of residence.

1. Introduction

This Privacy Policy describes how CallOnAlarm, operated by Homesecc Services (hereinafter "we", "our" or "CallOnAlarm"), collects, uses, stores and protects the personal data of users of our alert notification platform accessible at callonalarm.io.

We are committed to respecting your privacy and protecting your personal data in accordance with Regulation (EU) 2016/679 (GDPR) and Directive 2002/58/EC (ePrivacy Directive).

This policy applies to all users of our Service within the European Union and the European Economic Area.

2. Data Controller

Within the meaning of Article 4(7) of the GDPR, the data controller is:

Homesecc Services — French simplified joint-stock company (SASU)

Registered office: 3 les crêtes, 14220 Le Hom, France

EU VAT Number: FR95951691989

Data Protection Officer (DPO): privacy@callonalarm.io

2.1 Roles and Responsibilities

For Customer data (account holders), CallOnAlarm acts as data controller. For Emergency Contact data, the Customer acts as data controller and CallOnAlarm acts as data processor within the meaning of Article 28 of the GDPR.

3. Personal Data Collected

3.1 For Account Holders (Customers)

- Identification data: surname, first name
- Contact details: email address, phone number (optional)

- Payment data: processed by Stripe Inc. — we do not store credit card numbers
- Technical data: IP address, connection data, usage logs
- Usage data: event history, call logs, configurations

3.2 For Emergency Contacts

- Name (as provided by the Customer)
- Phone number
- Consent status and proof (date, time, call identifier)
- History of received calls and DTMF actions

3.3 Data Not Collected

We do not collect special categories of data within the meaning of Article 9 of the GDPR (ethnic origin, political opinions, religious beliefs, health data, sexual orientation, etc.).

4. Legal Bases for Processing

In accordance with Article 6 of the GDPR, our processing is based on:

4.1 Performance of Contract (Article 6.1.b)

For our Customers, processing is necessary for the performance of the service contract.

4.2 Explicit Consent (Article 6.1.a)

For Emergency Contacts, we obtain explicit consent via an automated phone call during which the contact presses key 1 to accept or key 9 to refuse.

4.3 Legitimate Interest (Article 6.1.f)

In certain limited cases (platform security, fraud prevention, service improvement).

4.4 Legal Obligation (Article 6.1.c)

Certain data is retained to meet our legal obligations (accounting, taxation).

5. Purposes of Processing

Your personal data is processed for the following purposes:

- Providing the alert notification service
- Verifying and documenting emergency contact consent
- Managing user accounts and authentication
- Billing and subscription management
- Service-related communications

- Platform security and fraud prevention

Important: We never use your data for unsolicited commercial prospecting or profiling for advertising purposes.

6. Data Recipients

6.1 Technical Subcontractors

- **Twilio Inc. (USA):** telephony provider — EU-US Data Privacy Framework certified
- **Stripe Inc. (USA):** payment provider — EU-US Data Privacy Framework certified
- **Hetzner Online GmbH (Germany):** hosting provider — data stored in EU
- **Neurosaas (France):** platform design and technical maintenance — data stored in EU

6.2 Competent Authorities

In case of legal requisition, we may communicate data to competent authorities.

6.3 No Sale of Data

We never sell, rent or share your personal data with third parties for commercial purposes.

7. International Transfers

Our main servers are hosted within the European Union (Hetzner, Germany/Finland). Some data may be transferred to the United States via Twilio and Stripe.

These transfers are governed by:

- The EU-US Data Privacy Framework adequacy decision (July 10, 2023)
- Standard Contractual Clauses (decision 2021/914)

8. Retention Period

We retain your personal data only for the duration necessary:

Data Category	Duration	Justification
Customer account data	Contract + 5 years	Accounting obligations
Active emergency contacts	Customer contract duration	Service execution
Deleted contacts	3 years after deletion	Proof of consent
Call logs	5 years	Legal obligations
Consent proofs	5 years after end	Burden of proof
Technical logs	1 year	Security, debugging
Billing data	10 years	Accounting obligations

9. Your Rights

In accordance with Articles 15 to 22 of the GDPR, you have the following rights:

- **Right of Access (Article 15):** obtain confirmation and access to your data
- **Right to Rectification (Article 16):** correct inaccurate data
- **Right to Erasure (Article 17):** request deletion of your data
- **Right to Restriction (Article 18):** limit processing in certain cases
- **Right to Portability (Article 20):** receive your data in a structured format
- **Right to Object (Article 21):** object to processing based on legitimate interest
- **Right to Withdraw Consent (Article 7.3):** withdraw consent at any time

To exercise these rights, contact us at: privacy@callonalarm.io

We will respond within one (1) month in accordance with Article 12.3 of the GDPR.

10. Data Security

We implement appropriate technical and organizational measures:

- **Encryption:** TLS 1.3 for all communications, bcrypt hashing for passwords
- **Access Control:** strong authentication, least privilege principle
- **Infrastructure:** ISO 27001 certified EU hosting, high availability
- **Monitoring:** 24/7 monitoring, intrusion detection

11. Data Breach Notification

In case of personal data breach:

- We document the breach in our internal register
- If risk exists, we notify the supervisory authority within 72 hours
- If risk is high, we inform you directly

12. Cookies

Our site uses only cookies strictly necessary for the operation of the Service (session cookies, authentication). We do not use advertising or tracking cookies.

13. Policy Modifications

We reserve the right to modify this Privacy Policy. Substantial modifications will be notified to our Customers by email.

14. Complaints and Supervisory Authorities

You have the right to lodge a complaint with a supervisory authority (Article 77 GDPR).

Contact us first: privacy@callonalarm.io

Supervisory authorities:

- **France:** CNIL — www.cnil.fr
- **Germany:** BfDI — www.bfdi.bund.de
- **Spain:** AEPD — www.aepd.es
- **Italy:** Garante — www.garanteprivacy.it
- **Others:** https://edpb.europa.eu/about-edpb/about-edpb/members_en

15. Contact

Data Protection Officer: privacy@callonalarm.io

General Support: support@callonalarm.io

Postal Address: Homesecc Services — 3 les crêtes, 14220 Le Hom, France

Website: <https://callonalarm.io>

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