PRIVACY

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YOUR MESSAGE	It arrives in my mailbox. Without a quote, I delete it after 12 months.
VISITS	I count them without cookies. Google Analytics only loads if you accept it.
BOOKING A CALL	The Google booking calendar only loads if you accept it, when you click to book a call.

1 WHO IS RESPONSIBLE

Twinded is the sole proprietorship of Thomas Cloarec, in Montreal (Québec). I am the person in charge of the protection of personal information at Twinded, and the only person who works there. This English text is a translation: the French version of this policy is the official one.

For any question, request or complaint, write to me at contact@twinded.ca. My mailing address is available on request.

In plain words : It's me, Thomas Cloarec. Write to me at contact@twinded.ca.

2 WHAT I RECEIVE, AND WHY

When you write to me through the form

The form sends me your name, your email, your organization if you give it, the type of need, how you heard about me, your message, the page you are writing from and the language of the site. I use them to answer you and, if you wish, to prepare a quote.

To block bots, Cloudflare Turnstile checks that the form is sent by a person. For this it receives your IP address and technical information about your browser.

Your request reaches me by email. I keep it in my mailbox and in my client management tool.

When we work together

For a quote, a contract or an invoice, I keep your organization's name, your name, your email, your phone number and the billing address, with the amounts and payments. I use them to do the work, invoice you and meet my accounting and tax obligations.

To do the work, I also keep the access you entrust to me (hosting, domain name and admin accounts) and our exchanges.

When you book a call

The "Book a call" button loads Google's booking calendar. Google then receives your name, your email and the time slot you choose, and may set its own cookies. That is why the calendar only loads with your consent, and otherwise you can write to me.

When you visit the site

I count visits with Cloudflare Web Analytics, without cookies and without individual profiles. I see totals (pages viewed, country, browser), never a person.

If you accept it, I also use Google Analytics 4. It sets cookies that recognize your browser from one visit to the next, and it shows me which pages are read and where visitors come from. It does not load without your consent.

In plain words : I receive what you write to me, what I need to work and invoice you, and visit totals.

3 COOKIES

The site uses three kinds of cookies.

- Necessary cookies, which protect the form against bots (Cloudflare) and remember your cookie choices. They do not require consent.
- Audience measurement, with Google Analytics 4.
- The Google calendar, loaded when you want to book a call.

The last two are off by default. They only load if you accept them in the banner. You can change your mind at any time with the "Cookies" link at the bottom of every page. Withdrawing your consent is as simple as giving it.

The site uses no advertising cookies.

In plain words : Nothing beyond what is necessary loads without your consent, and you can change your choice.

4 WHO ELSE PROCESSES THIS INFORMATION

I do not sell or rent your information. I use providers who process it for me, each for a specific purpose. Most of them are outside Québec. For each one, I give the country where it says it keeps the data.

- Cloudflare hosts the site, delivers form messages, counts visits and keeps my backups. Mainly in the United States and the European Union, with possible access from other countries.
- Google provides my email (Gmail), my calendar, my file storage (Drive) and Google Analytics. On servers located in several countries, which Google does not specify.
- Invoice Ninja is the quoting and invoicing software I install on my own server. It keeps your details as a client or prospect.
- OVH rents me that server, as well as those of my clients' websites. In Canada.
- Brevo sends my quotes and invoices by email. In the European Union.
- Stripe processes card payments and pre-authorized debits. In the United States.
- 1Password keeps the passwords and access you entrust to me. In the United States.
- Todoist keeps my task list, which may contain the name of a client or project. In the United States, and in other countries it does not specify.
- Anthropic provides Claude, the assistant I use to match received transfers with my invoices, keep my billing and work on project code. In the United States, and in the countries of its subprocessors.
- GitHub keeps project code. In the United States, and in other countries where it operates.
- Desjardins and Revolut, my banks, receive the transfers you send me, with the sender's name. My Revolut account is European, so Revolut processes this information in the European Union.

Before entrusting information to a provider outside Québec, I assess the privacy risks, as the law requires, and I keep that assessment. These providers are bound by their own data processing terms.

I may also have to disclose information when the law requires it, for example to a tax authority.

In plain words : My providers process your information for me, most of them outside Québec. I sell nothing to anyone.

5 HOW LONG I KEEP IT

- A request without a quote, or a declined quote, is deleted 12 months after the last exchange.
- Client files (quotes, contracts, invoices) are kept 6 years after the end of the fiscal year they relate to, as tax laws require.
- Emails and appointments follow the retention period of the file they belong to.
- Google Analytics data is deleted after 14 months.
- My clients' website data is deleted 30 days after the end of the contract. Backup copies disappear on their rotation.

When a period has passed, I delete the information or make it anonymous.

In plain words : A request with no follow-up goes after 12 months, a client file after 6 years.

6 HOW I PROTECT IT

I am the only person with access to this information. Passwords and access are kept in a password manager. I only use your information for the purpose you were told about.

I do not add you to any mailing list. I write to you about your request or your project, not to sell you something else.

If an incident affects your information, I record it in a register. If it presents a risk of serious injury, I notify the Commission d'accès à l'information and the people concerned.

In plain words : I am the only one with access, and I do not sign you up for any newsletter.

7 YOUR RIGHTS

You can ask me:

- to see the information I hold about you and to know where it comes from;
- to correct it if it is inaccurate or incomplete;
- to withdraw a consent you gave me;
- to stop disseminating information about you;
- to receive your information in a common format, to pass it on elsewhere.

Write to me at contact@twinded.ca. I answer within 30 days. I may ask you to confirm your identity first.

If my answer does not satisfy you, you can turn to the Commission d'accès à l'information du Québec. Outside Québec, in Canada, it is the Office of the Privacy Commissioner of Canada.

In plain words : Write to me to see, correct or withdraw your information. I answer within 30 days.

8 CHANGES TO THIS POLICY

The date of the current version is at the top of this page. If I change something important, I announce it on the site before the change applies. Previous versions remain available on request.

In plain words : The date at the top of the page tells you whether the policy has changed.