Privacy Policy for NoCap

Effective Date: 10/05/2025

This Privacy Policy sets out how **NoCap**, operated from France by individual entities ("we," "us," or "our"), collects, uses, stores, and otherwise processes personal data in accordance with applicable data protection laws, including the **General Data Protection Regulation (EU) 2016/679** ("GDPR").

1. Data Controller

The data controller for the processing of personal data described in this policy is: **NoCap**

Contact location: 17 Boulevard Jourdan, 75014 Paris

Email: team@projectnocap.org

2. Scope of Application

This Policy applies to all individuals ("users," "data subjects") who interact with NoCap, including via Instagram or other platforms where our service is made available. This Policy is applicable globally, with a foundational compliance framework based on GDPR.

3. Personal Data Collected

We may collect and process the following categories of data:

- Instagram posts or links shared via interaction with our bot;

- Textual requests and queries directed to our bot or service;

- Generated content or descriptions created by NoCap in response to user submissions.

Note on Anonymity: While NoCap does not actively store personal identifiers (such as user IDs or account names), technical metadata inherent to third-party platforms (such as Instagram) may incidentally be accessible. Full anonymity cannot be guaranteed.

4. Purpose and Legal Basis of Processing

Your personal data is processed solely for the following purposes:

- To provide automated responses and content generation;

- To ensure the performance and enhancement of our services;

- To monitor functionality and prevent abuse or misuse.

The legal bases under the GDPR for the aforementioned processing activities are:

- **Article 6(1)(a) GDPR** – Consent, given explicitly through voluntary interaction with the service;

- **Article 6(1)(f) GDPR** – Legitimate interests pursued by the controller in maintaining and improving the service.

5. Data Retention

All personal data and user-generated content are retained for a maximum period of 3 years unless otherwise required by law or necessary for the establishment, exercise, or defense of legal claims.

Data may be deleted or anonymized at any time upon request by the user.

Voluntary Nature of Submission
Providing data to NoCap is entirely voluntary. However, certain features or services may not function as intended without this information (e.g., if no post is submitted, the bot cannot generate a response). NoCap does not require personal identifiers, but interactions are necessary for the service to operate.

6. Data Recipients and Transfers

NoCap does not operate proprietary servers and relies on trusted third-party service providers for processing, storage, and content delivery. These include, but may not be limited to:

- **Cloudflare** (performance, security, CDN),

- **Meta Platforms Ireland** (Instagram),

- **OpenAI** (automated content generation),

- **Anthropic (Claude)** and **Perplexity** (AI-based responses and tools).

These providers may process personal data on our behalf and act as **data processors** under a Data Processing Agreement (DPA) where applicable. Some of these providers are located outside the European Economic Area (EEA), including in the United States.

Where such international transfers occur, we ensure that **appropriate safeguards**—such as **Standard Contractual Clauses (SCCs)** approved by the European Commission—are implemented in accordance with **Chapter V of the GDPR**. We take all reasonable steps to select providers that uphold adequate levels of data protection consistent with EU standards.

We do **not sell, rent, or commercially distribute** your personal data to third parties.

7. Data Subject Rights

Pursuant to Articles 12–22 of the GDPR, you have the right to:

- Access your personal data;

- Rectify inaccurate or incomplete data;

- Erase your data ("right to be forgotten");

- Restrict the processing of your data;

- Object to processing under certain conditions;

- Withdraw your consent at any time (where consent was the basis for processing);

- Request your data in a portable, machine-readable format ("data portability");

- Lodge a complaint with a data protection authority.

However, because NoCap does not collect or store personal identifiers such as names, email addresses, or Instagram usernames, we may not be able to identify or retrieve specific data unless you provide sufficient contextual information (e.g., a screenshot of the interaction).

We will always do our best to assist you in exercising your rights, where technically and legally feasible.

To make a request, contact us at: team@projectnocap.org

8. Security Measures

We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including but not limited to:

- Encrypted data storage (where applicable through third-party providers);

- Controlled access to systems and infrastructure;

- Regular data lifecycle reviews and access control policies.

Please note that while we take all reasonable steps to safeguard personal data, no system is entirely immune to security risks.

9. Cookies and Tracking Technologies

NoCap does not currently operate a website that uses cookies. Should this change, we will implement a cookie policy compliant with **Directive 2002/58/EC (ePrivacy Directive)** and applicable national laws, including a clear cookie consent mechanism.

10. Changes to This Policy

We reserve the right to amend or update this Privacy Policy at any time. Users will be notified of material changes where required by law. The latest version will always be made available via our official communication channels.

11. Contact

For any questions, data access requests, or complaints regarding this Privacy Policy or the processing of your personal data, please contact:

NoCap – Privacy Contact

Email: **teamprojectnocap.org**

Supervisory Authority: **CNIL (Commission Nationale de l'Informatique et des Libertés)**

Website: https://www.cnil.fr