

PRIVACY POLICY

Obscura® Software – L'Observatoire de la Nuit SAS

Version 1.0 – June 2026 | Effective as of 25 June 2026

1. DATA CONTROLLER

Company name	L'Observatoire de la Nuit SAS
SIRET	897 607 537 00031
Registered office	1 place de la Petite Hollande, 44000 Nantes, France
Data protection contact	nicolas@obscura.lighting
Website	https://obscura.lighting

L'Observatoire de la Nuit SAS (hereinafter "Obscura" or the "Data Controller") is responsible for the processing of personal data carried out in connection with the provision of the Obscura® software and associated services.

2. SCOPE

This Privacy Policy applies to all processing of personal data carried out in connection with:

- use of the Obscura® software in on-premise mode;
- browsing the website <https://obscura.lighting>; and
- communications between Obscura and subscribed professionals or prospective clients.

It is addressed to natural persons whose data is processed in this context, whether they are Clients, designated end Users or visitors to the website.

3. DATA COLLECTED

3.1 Identification and Contact Data

When subscribing to a Subscription or activating an Authorized Identifier, Obscura collects: the first and last name of the main contact; a professional email address; the corporate name and country of the client organisation; and a telephone number (optional).

3.2 Authentication Data

Obscura processes the email addresses used as Authorized Identifiers and the associated authentication tokens. Passwords, where applicable, are stored in hashed form and are never accessible in plain text.

3.3 Usage and Telemetry Data

In order to improve the Products and ensure technical stability, Obscura collects anonymised or pseudonymised usage data, including: session logs (date, duration, access type); features used; error and crash events; and anonymised rendering performance data. This data does not allow the content of Users' design projects to be identified.

3.4 Billing Data

Billing data is processed via the Payment Provider (Stripe). Obscura does not directly store credit card numbers or sensitive payment data.

3.5 Data Not Collected

Obscura does not collect the content of lighting design projects created by Users within the software — neither scene files nor files imported by Users (IES, DXF, GLB, IFC). The telemetry data described in Section 3.3 concerns actions performed within the software (features used, luminaire parameters, technical events) and not the content of the projects themselves. Obscura does not collect special category data within the meaning of Article 9 GDPR.

4. LEGAL BASES AND RETENTION PERIODS

Purpose	Legal basis (Art. 6 GDPR)	Retention period
Subscription and Authorized Identifier management	Performance of contract (6.1.b)	Subscription term + 5 years
Billing and debt recovery	Legal obligation (6.1.c)	10 years
Technical support	Performance of contract (6.1.b)	Subscription term + 2 years
Usage telemetry (pseudonymised)	Legitimate interest (6.1.f)	13 rolling months
B2B prospecting	Legitimate interest (6.1.f)	3 years from last contact
Security and fraud prevention	Legitimate interest (6.1.f)	12 months

5. RECIPIENTS OF DATA

Obscura does not sell personal data to third parties. Data may be shared with the following categories of recipients, strictly within the purposes described above:

- **Payment Provider (Stripe)** – billing data, for payment processing purposes;
- **Hosting provider** – technical log data;
- **Support tool (ticketing)** – contact details and support request descriptions;
- **Obscura's legal and accounting advisers** – within the strict scope of their mandate.

These service providers act as processors within the meaning of Article 28 GDPR and are bound by data processing agreements ensuring an equivalent level of protection.

6. INTERNATIONAL TRANSFERS

Where sub-processors are established outside the European Economic Area, transfers are governed by an adequacy decision of the European Commission or by the standard contractual clauses (Art. 46.2.c GDPR). Detailed information on applicable transfer mechanisms may be obtained on written request to nicolas@obscura.lighting.

7. RIGHTS OF DATA SUBJECTS

In accordance with the GDPR and the French Data Protection Act (Loi Informatique et Libertés), every data subject has the following rights:

- Right of access (Art. 15): obtain confirmation of processing and a copy of personal data;
- Right to rectification (Art. 16): correct inaccurate or incomplete data;
- Right to erasure (Art. 17): request deletion under the conditions set out in the GDPR;
- Right to restriction (Art. 18) and to data portability (Art. 20);
- Right to object (Art. 21): object to processing based on legitimate interests, including direct marketing.

These rights may be exercised by email to nicolas@obscura.lighting (subject line: 'GDPR Rights Exercise'), with proof of identity if required for identification purposes. Obscura will respond within one (1) month of receiving the request. If the response is

unsatisfactory, a complaint may be lodged with the CNIL (Commission Nationale de l'Informatique et des Libertés – www.cnil.fr).

8. DATA SECURITY

Obscura implements appropriate technical and organisational measures to protect personal data, including: encryption of data in transit (TLS 1.2 minimum); access control via Authorized Identifiers; pseudonymisation of telemetry data; logging of access to critical systems; and a business continuity and disaster recovery plan.

In the event of a personal data breach likely to result in a risk to the rights and freedoms of natural persons, Obscura will notify the CNIL within 72 hours (Art. 33 GDPR) and will inform data subjects if the breach is likely to result in a high risk.

9. COOKIES AND SIMILAR TECHNOLOGIES

The website <https://obscura.lighting> uses only technically necessary cookies required for the site to function. No advertising or third-party tracking cookies are placed without the user's consent. The Obscura® launcher does not place any cookies.

10. CHANGES TO THIS PRIVACY POLICY

Obscura reserves the right to amend this Privacy Policy at any time. Any material changes will be notified to subscribed Clients by email with at least thirty (30) days' prior notice. The current version is permanently available at <https://obscura.lighting/privacy-policy> and within the Products' launcher interface. Continued use of the Products after notification of a change constitutes acceptance of the updated Policy.