Privacy policy

What Générale CI collects, why, for how long, who receives it, and how to exercise your rights.

Version 1.1 | In force on 26 October 2026

> This is a courtesy translation. The French version is the only legally binding text: in the event of any discrepancy, the French version prevails.

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This policy explains **exactly** what Générale CI does with your data. It is written in application of **Ivorian Law No. 2013-450 of 19 June 2013** on the protection of personal data, Article 28 of which requires us to inform you at the time of collection.

It describes the service as it actually works. When a feature exists but is **not yet switched on**, we say so rather than let you believe otherwise.

What changes in version 1.1

Version 1.0 was dated 27 July 2026. Since then the service has added features and changed providers. This version describes them:

- Artificial intelligence features now go through **OpenRouter**, which passes your requests to the chosen model (OpenAI, Z.ai, Google, ByteDance). We state, feature by feature, what is sent and to which model.
- New features described: the **support assistant**, **virtual try-on**, the **music generator**, **the** personal shopper **(buying abroad with 2S Klass), the** code sent by SMS** for gift cards, and **photo proofs** taken by the seller and the courier.
- Text messages are now sent through **LeTexto** and **Termii**, no longer through Google.
- Some processing runs **on our own servers**, with no third party involved: maps and routes, meaning-based search, reading product photos, lyric synchronisation.
- **Meta advertising**: the product catalogue is sent to Meta, and an ad link can open the right product the first time you launch the app. We explain what this keeps (a fingerprint of your IP address, for 3 hours).
- Courier positions are now kept for **30 days**, down from 90.
- In-app audience measurement and technical monitoring, both subject to your consent, are described in detail.

Version 1.0 remains available.

Who is responsible for your data

The data controller is **ETS APAMA** (ÉTABLISSEMENT APAMA), Sole proprietorship (individual trader registered in her own name),

trade register (RCCM) No. CI-ABJ-02-2007-A10-01226, Yopougon Niangon Cité Marine, Abidjan, Côte d'Ivoire.

Contact for any question or to exercise your rights:

info@generale-ci.com.

ETS APAMA undertakes to complete the prior formalities required by articles 5 to 7 of Law No. 2013-450 with ARTCI, and to publish the reference of the certificate on this page as soon as it is issued.

The data we collect

We only collect what is needed to run the service (Article 16: data must be *adequate, relevant and not excessive*).

To create and maintain your account

- Your **phone number**. It is your identifier: without it, no order can be delivered to you and no payment linked to you.
- Your **name**, your password (stored in hashed form, never in clear text), your profile photo if you add one.
- Your chosen **language** and display preferences.
- The date on which you accepted our terms, and the **version** you accepted.
- A **log of the text messages** sent to you: number, type of message (sign-in code, card code), provider, delivery status. **The text of the message is not kept**, so neither your sign-in code nor your card code is stored there.

To deliver to you

- Your **delivery addresses**: commune, neighbourhood, the **precise GPS position** of the delivery point and a **landmark** written by you ("blue gate after the pharmacy"). The courier needs it to find you without calling ten times.
- Your **orders**: items, amounts, payment method, status, history.
- **Proof of delivery**: confirmation code, photo of the parcel taken by the courier at pick-up and at delivery, and the photo the seller may take when handing the parcel over. In case of refusal or return, the photo and reason entered by the courier.

If you are a **courier**, we also process your **GPS position** while you are on duty, and only then: your last known position, and the **position history** of your deliveries. We also process your deliveries and your safety alerts (SOS) with the associated position.

For your payments

- The **payment method** chosen, the amount, the transaction status, the payment session reference, refunds.

- Your **Wave number** when you request a withdrawal.
- Your Générale CI **wallet**: credits, promotional codes used, referrals, affiliate earnings,

try-on packs purchased.

> We never see your Wave PIN, and we store no bank card data. Payment takes place at Wave,

> not with us.

What you publish

Short videos, comments, live chat messages, reviews, ratings and review photos, photos of your items if you are a seller. This content is **public** by nature: it is visible to other users.

If you sell

- Your shop information: name, logo, cover, description, opening hours, commune, the shop's

GPS position and a **landmark** for the courier.

- At the **first pick-up** of a parcel, the courier will be able to correct the recorded

position if it does not match the shop's real location. This feature is being rolled out; you will be told of any correction.

- For **identity verification**: the **identity documents** you upload (front/back, or a PDF

document). They are used solely to check that you are who you say you are before letting you receive money.

- Your sales, balance, withdrawal requests and invoices.
- If several people run the shop: the invited members, their role, and the log of their

actions on the shop.

> Identity documents are the most sensitive data we hold. They can only be viewed by the

> people in charge of verification, are never published, never passed to another user, and

> are destroyed according to the schedule below.

When you write to support

In-app support starts with an **automated assistant** (an artificial intelligence model). To answer you, it reads information from **your** account: your orders, their payments, their deliveries, your credit. If you write as a seller, it also reads your balance, your withdrawals and the orders you have received.

We keep:

- your **messages**, the **photos and videos** you attach, and the transcript of your voice messages;
- the **case file** opened when the assistant passes your request to the team (reference SUP-…), together with the decision taken;
- your **rating** of how the ticket was handled.

Anything the assistant cannot settle is passed to **a member of the team**. No credit and no refund is granted by artificial intelligence alone: a person decides.

If your request concerns an order, the assistant may **ask the seller**: the seller receives your question and the **photos** you attached, and their answer is passed back to you. It may also ask the **delivery partner** about a delivery. A ticket left unanswered by you for 6 hours is closed automatically; you can reopen it.

In-app services

- **Virtual try-on**: the photo of yourself that you send, the chosen item, and the resulting image. Your photo is **deleted as soon as processing ends**, whether the try-on succeeds or not. The resulting image stays in your try-on history.
- **Music generator**: the subject, style and details you give (a first name, a memory), the lyrics and song produced, and the cover. Your request is checked automatically before payment so that a defamatory song can be refused.
- **Personal shopper** (buying from foreign websites with our partner **2S Klass**): links to the items you want, items and quantities, your delivery commune, fees and payments. Our server reads the public product page on the merchant's website; it sends no information about you there.

- **Card code by SMS**: if you ask for it, your gift card code is also sent to you by text message in addition to the app.

How you use the application

- Your **searches** (including photos sent for an image search), items viewed, added to favourites or to your cart.
- Your **exchanges with the assistant**: the text, image or voice recording you send it.
- Your **country**, inferred from your IP address by a database installed on our server, without calling any third party. It is used to show gift cards and other digital products only where Wave payment works (Côte d'Ivoire, Senegal, Mali, Burkina Faso). The IP address is not kept for this purpose.
- **Technical logs**: date and time of requests, IP address, device type, app version, errors encountered.
- Your **notification token** (provided by Apple or Google), which lets us send a notification to your device without ever revealing your identity with them.

Only with your consent (asked in the app, answer changeable in your profile):

- **audience measurement**: screens viewed, buttons used (by their technical name, never the text you type), time spent, steps of the purchase journey. It is linked to a random identifier created on your phone, **with no link to your name, your number or your account**;
- **technical monitoring**: app crashes, errors and slowdowns, sent to our monitoring tool (log.generale-ci.com, on our servers), again **without your number or any account identifier**.

If you refuse, nothing is sent, crashes included. If you withdraw your consent, the audience measurement events already linked to that identifier are deleted.

If you arrive through an ad

When you tap a Générale CI ad on Facebook or Instagram without having the app, a page on our website (generale-ci.com/a/...) sends you to the store. To open the right item on your first launch, we keep for **3 hours**: a **fingerprint** of your IP address (irreversibly

encrypted; the address itself is never written down), your system (Android or iOS) and its version, the phone model when the browser provides it, and the item concerned. On first launch, the app sends the same details to find that click.

This matching is approximate: several people may share the same IP address on a mobile network. At worst, the app opens an item that was not yours. No account and no phone number is attached to the click, and **nothing is sent back to Meta**.

What we do not collect

We collect **no sensitive data** within the meaning of Article 21 of the Law: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, genetic or health data. Collecting it is in fact a criminal offence.

Do not publish such information in your listings, reviews, videos or song requests.

Nor do we collect your contacts, your calendar, or your position when the app is closed, except for couriers on duty, who are informed and switch themselves online. The photo sent for a try-on is not used for any facial recognition.

Why we use them, and on what basis

Article 14 of the Law sets **consent** as the principle, with exceptions including the performance of a contract to which you are a party.

What we do	Why	Legal basis (Art. 14)
Create your account, sign you in (code by SMS)	Identify you reliably	Performance of the contract
Process and deliver your orders	It is the very purpose of the service	Performance of the contract
Photo proofs at pick-up and delivery	Establish the parcel's condition in a dispute	Performance of the contract and legitimate interest
Collect payments and refund	Pay the seller, refund you	Performance of the contract

What we do	Why	Legal basis (Art. 14)
Verify sellers' identity	Protect buyers from fraud	Legal obligation and legitimate interest
Answer support requests, settle a dispute	Solve your problem	Performance of the contract, at your request
Try-on, music, personal shopper	Provide the service you paid for	Performance of the contract, at your request
Assistant and image search	Help you find a product	Performance of the contract, at your request
Notifications about your orders	Tell you about an event that concerns you	Performance of the contract
Engagement notifications (new items, lives)	Bring you back to the service	Consent, withdrawable at any time
Commercial and promotional messages	Offer you deals	**Prior consent** (Art. 22)
Recommendations and item ranking	Show you what interests you	Legitimate interest
Country inferred from the IP address	Offer digital products only where Wave works	Legitimate interest
Open an ad's item on first launch	Save you searching for it	Legitimate interest
Courier position history	Reconstruct a disputed delivery, safety	Legitimate interest
Security, fraud and abuse prevention	Protect the service and its users	Legitimate interest
Audience measurement and technical monitoring	Improve the service, fix crashes	**Consent**

> **Direct marketing: your consent first.** Article 22 of Law No. 2013-450 **prohibits**

> direct marketing aimed at a person who has not consented to it beforehand, and punishes it

> with one to five years' imprisonment and a fine of 1,000,000 to 10,000,000 FCFA. You can

> refuse commercial messages at any time in *Profile* → *Notifications*, free of charge

> (Art. 30), without this degrading the rest of the service in any way. Messages **about

> your orders** are not marketing: they keep being sent.

Automated decisions

Item ranking, recommendations and the first support answers are produced automatically. In accordance with Article 25 of the Law, no decision producing an effect on you (refusal of sale, blocking, sanction, refusal or grant of a refund) is taken solely on the basis of automated processing: a person always steps in. The automatic check of a song request may refuse it before payment; if you dispute that refusal, write to support.

Artificial intelligence tools

Several features use artificial intelligence models. Some run on our servers, others at providers.

What stays on our servers

This processing sends **nothing to a third party**:

- **reading product photos** (spotting the colours or models in a gallery);
- **meaning-based search**, which understands a sentence such as "a dress for a wedding";
- **synchronising the lyrics** of generated songs;
- **maps** and **delivery route calculation**, served by our own mapping servers;
- **live video**, broadcast by our own server.

What goes to a provider

These requests go through **OpenRouter**, an intermediary that passes them to the model

shown. Only what the request needs is sent; your phone number is not part of it.

Feature	What is sent	Model
Shopping assistant	Your message, the image or audio sent, the items found	OpenAI (GPT)
Voice dictation (assistant, support)	The recording of your voice	Google (Gemini)
Support assistant	Your messages, the relevant information from your account and orders	Z.ai (GLM)
Reading photos and videos attached to support	The photo or video	Z.ai (GLM)
Virtual try-on	**The photo of you** and the photo of the item	OpenAI (gpt-image)
Song lyrics and check	The subject, style and your details	Z.ai (GLM)
Music	The lyrics and style	Google (Lyria)
Cover	A description of the style, **without** the title or subject of your song	ByteDance (Seedream)

Image search and the image enhancement reserved for Pro sellers are **switched off** today.

If they are switched back on, the photo concerned will be sent to OpenAI. OpenAI may also be called directly, without OpenRouter, as a fallback if OpenRouter is unavailable.

The case files the support assistant passes to the team are prepared by an internal agent using a model from **Anthropic** (Claude), then shown to the person who decides on the **Telegram** messaging service: name, number, the support conversation and links to the attached photos.

How long we keep them

Article 16 forbids keeping data beyond what is necessary. Here are our retention periods, and the reason for each.

Data	Period	Why this period
Account and profile	The life of the account; after a deletion request, **30 days** to change your mind, then deletion or anonymisation	Beyond that, no purpose remains
Orders, payments, invoices, personal shopper orders	**10 years**	Accounting and tax obligations
Delivery addresses and shop positions	Life of the account, or until you delete them	You reuse them from one order to the next
Identity documents (seller verification)	Destroyed **90 days** after the decision; only the decision and its date are kept	The document is useless once verification is done
Proof of delivery and return (photos, code)	**24 months**	Covers the period in which a dispute may arise
Courier position history	**30 days**, deleted automatically	Reconstruct a disputed delivery
Safety alerts (SOS)	**5 years**	It may be a workplace accident
Support conversations, attached photos and videos, case files	**24 months** after the ticket is closed	A dispute can resurface after delivery
Photo sent for a try-on	**Deleted as soon as processing ends**	It is only used to produce the image
Try-on images, songs and covers produced	Life of the account	It is a service you paid for
Published content (videos, reviews, comments)	Until deleted by you or by moderation	It is your content
Search and browsing history	**24 months**	Beyond that, worthless for recommendations
Exchanges with the assistant	**12 months**	Keep a conversation's thread, correct mistakes

Data	Period	Why this period
Click on an ad (IP fingerprint, device, item)	**3 hours**, deleted automatically	The time it takes to install the app
Audience measurement (with your consent)	Events: **90 days**; daily totals, with no identifier: **12 months**	Compare one period with another
Technical monitoring (with your consent)	**90 days**	Fix crashes
Technical, sign-in and text-message logs	**12 months**	Security and incident investigation
Notification tokens	Until revoked, or **12 months** without use	An unused token is a dead token
Refusal of marketing	**No limit**	We must remember that you said no

Some data survives the deletion of your account where the law requires it (Article 35):

this is the case for accounting records. Details are on the

delete my account page.

Who receives your data

We **never** sell your data. It is passed only to those who must receive it for the service

to work.

Other users

- The **seller** of an item you order receives your name, phone number and delivery address,

without which they can neither prepare nor ship your parcel. During a support mediation,

they also receive your question and the photos you attached.

- The **courier** handling your delivery receives your name, phone number, the address, its

GPS position and the landmark.

- Your **public content** (reviews, videos, comments) is visible to everyone.

Our service providers

Provider	What it does	What it receives	Where
Wave	Payments, payouts, refunds	Amount, reference, phone number	Côte d'Ivoire
LeTexto (Arolitec)	Text messages: sign-in codes, card codes	Number, message text	Côte d'Ivoire
Termii	Text messages: sign-in codes (depending on the network)	Number, message text	Nigeria
OpenRouter	Access to artificial intelligence models	See the AI tools table	United States
OpenAI, Z.ai, Google, ByteDance	Artificial intelligence models, via OpenRouter	See the AI tools table	Outside CI (United States, China, or elsewhere depending on the server chosen)
Anthropic	Preparing support case files for the team	Content of the case file	United States
Telegram	The team's internal messaging to decide on case files	Case file summary	Outside CI
Google / Firebase	Android notifications	Device token	Outside CI
Apple	iOS notifications	Device token	Outside CI
Expo	Notification delivery	Device token, notification content	Outside CI
Meta	Product catalogue for Facebook and Instagram ads	Item data only (name, price, photo, link); **no personal data**	Outside CI
Gcore	Delivery of photos and videos	IP address, requested file	Global network

Provider	What it does	What it receives	Where
HostHatch	Hosting of the service	All data	London, United Kingdom
Delivery partner	Carrying out deliveries, support questions about a delivery	Name, phone, address, position, landmark, parcel photos	Côte d'Ivoire
2S Klass	Purchases abroad (personal shopper)	Name, phone, items ordered, delivery commune	Côte d'Ivoire

The authorities

Upon a lawful court order, or to report an offence of which we become aware.

Transfers outside Côte d'Ivoire

We must be clear on this point. The server hosting Générale CI is located in **London, United Kingdom**, and several of our providers (OpenRouter and the models it serves, Anthropic, Telegram, Google, Apple, Expo, Meta, Gcore) process data outside Ivorian territory. Your data therefore **leaves Côte d'Ivoire**.

Article 1 of the Law defines a *third country* as any State that is not a member of ECOWAS: the United Kingdom, the United States and China are. Article 26 makes such a transfer subject to two conditions: that the destination country ensures a **sufficient or equivalent** level of protection, and that the data controller obtains the **prior authorisation** of the protection authority. Article 7 also lists such transfers among the processing operations subject to authorisation.

ETS APAMA undertakes to complete the prior formalities required by articles 5 to 7 of Law No. 2013-450 with ARTCI, and to publish the reference of the certificate on this page as soon as it is issued. We will publish the reference obtained here.

What we do in the meantime to protect you: encryption of exchanges between your device and our servers, access restricted to the people who need it, minimisation of what is sent to each provider (your number is not sent to artificial intelligence models, your try-on photo is deleted after use), processing kept on our servers wherever possible, and encryption of

the most sensitive data.

Your rights

Law No. 2013-450 grants you rights that we apply free of charge.

- **To be informed** (Art. 28): that is the purpose of this page.
- **To access** your data and know where it comes from (Art. 29).
- **To rectify** anything inaccurate, incomplete or out of date (Art. 31).
- **To object** to processing on legitimate grounds, and **without having to justify

yourself** when it comes to marketing (Art. 30).

- **To obtain erasure** of your data and an end to its dissemination, the right to be

forgotten online (Art. 33 to 36). See delete my account.

- **To retrieve your data** in a structured, commonly used format, to transfer it elsewhere

(Art. 38).

- **Not to be subject to a purely automated decision** evaluating you (Art. 25).

How to exercise them

Write to **info@generale-ci.com** stating your request

and your account's phone number. We may ask you to prove your identity: it protects you

against someone impersonating you.

We reply within 30 days. If we cannot act on your request, we tell you why. Requests that

are manifestly abusive by their number or repetitive nature may be refused; in that case, it

is up to us to demonstrate the abuse (Art. 29).

If you are not satisfied

You can refer the matter to Autorité de Régulation des Télécommunications/TIC de Côte d'Ivoire (ARTCI), the authority entrusted by Law No. 2013-450 with the duties of the personal data protection authority, which receives complaints, has investigative

powers and may order the rectification, erasure or locking of data processed in breach of

the Law.

Security

We take the measures required by Articles 39 to 41: server access by cryptographic key only, encrypted connections (HTTPS/TLS) across the whole service, passwords stored as a non-reversible hash, digital product codes encrypted in the database and never written to our logs, access partitioned by each person's role, administrator sign-in with a **passkey** (the key stays on the administrator's device; we keep only its public part), and automatic blocking of repeated sign-in attempts.

No system is infallible. Should your data ever be breached, we would inform you and the protection authority.

Minors

Générale CI is not intended for people under **18** (Ivorian law considers anyone under eighteen a minor). We do not knowingly collect their data. Do not send a photo of a child for a try-on. If you find that an account belongs to a minor, write to us: we will close it and delete the associated data.

Advertising and audience measurement

What works today:

- the **product catalogue** is sent to Meta to show ads on Facebook and Instagram. It contains only item data, nothing about users;
- an **ad link** can open the right item on first launch, as described above. Nothing is sent back to Meta.

What exists but is **not active**: Générale CI has installed **no Meta pixel** and sends **no conversion events** to any ad network. A seller may enter their own Meta or Google tag for their shop's share pages; none has done so to date, and such a tag would only load after an explicit "I accept" from you. The planned operation is described in our tracker policy.

Changes

This policy carries a **version number** and an **effective date**, both shown at the top of the page. In the event of a significant change, we inform you in the app before it takes effect. Successive versions remain available (version 1.0): we must be able to prove which version you accepted, and you must be able to check it.

ETS APAMA — ÉTABLISSEMENT APAMA, operating the brand Générale CI. RCCM CI-ABJ-02-2007-A10-01226 — Yopougon Niangon Cité Marine, Abidjan, Côte d'Ivoire.

Contact : info@generale-ci.com — Document « Privacy policy » version 1.1 dated 26 October 2026.