

Privacy policy

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

Version 1.0

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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, whose article 28 requires that you be informed at the point of collection.

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

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 collect only 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** — this is your identifier: without it, no order can be delivered to you and no payment attached to you.
- Your **name**, your password (stored in hashed form, never in clear text), your profile picture if you add one.
- Your chosen **language** and display preferences.
- The date on which you accepted our terms, and the **version** accepted.

To deliver to you

- Your **delivery addresses**, the commune, and the GPS coordinates of the delivery point.
- Your **orders**: items, amounts, payment method, status, history.
- **Proof of delivery**: the confirmation code and, where applicable, a photograph taken by the courier. In the event of a refusal or a return, the photograph and the reason entered by the courier.

If you are a **courier**, we additionally process your **real-time GPS position** while you are on duty (and only then), your assignments, 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.

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

We never see your Wave secret code, 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 and ratings, photographs 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 image, description, opening hours.
- For **identity verification**: the **identity documents** you upload (front/back, or a PDF document). They serve only to verify that you are who you say you are before we let you collect money.
- Your sales, your balance, your withdrawal requests, your invoices.

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

staff responsible for verification, are never published, never passed to another user, and

are destroyed according to the schedule set out below.

How you use the application

- Your **searches** (including photographs sent for an image search), the items viewed, favourited or added to the basket.
- Your **exchanges with the assistant**: the text, image or voice recording you send it.
- **Technical logs**: date and time of requests, IP address, device type, application version, errors encountered.
- Your **notification token** (provided by Apple or Google), which allows a notification to be

sent to your device without ever revealing your identity with them to us.

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, sexual life, genetic or health data. Collecting such data is in fact a criminal offence. ****Do not publish such information**** in your listings, your reviews or your videos.

Nor do we collect your contacts, your calendar, or your location while the application is closed — except for couriers on duty, who are informed of this and switch themselves online.

Why we use them, and on what basis

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

What we do	Why	Basis (art. 14)
Create your account, sign you in	Identify you reliably	Performance of the contract
Process and deliver your orders	This is the very purpose of the service	Performance of the contract
Collect payment and issue refunds	Pay the seller, refund you	Performance of the contract
Verify sellers' identity	Protect buyers from fraud	Legal obligation and legitimate interest
Notifications about your orders	Tell you about an event concerning you	Performance of the contract
Engagement notifications (new items, live sales)	Bring you back to the service	Consent, revocable 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

What we do	Why	Basis (art. 14)
Assistant and image search	Help you find a product	Performance of the contract, at your request
Security, fraud and abuse prevention	Protect the service and its users	Legitimate interest
Audience statistics	Improve the service	Consent (see trackers)

Commercial prospecting: your agreement comes first. Article 22 of Law No. 2013-450

prohibits direct prospecting aimed at a person who has not consented to it beforehand,

and punishes it by one to five years' imprisonment and a fine of 1,000,000 to 10,000,000

FCFA. You may refuse commercial messages at any time under *Profile → Notifications*, free

of charge (art. 30), without this degrading the rest of the service in any way. Messages

relating to your orders are not prospecting: they continue to be sent.

Automated decisions

Item ranking and recommendations are computed automatically. They have **no legal effect** on you. In accordance with article 25 of the Law, no decision producing an effect on you — refusal of sale, blocking, sanction — is taken solely on the basis of automated processing: a human being is always involved.

How long we keep them

Article 16 prohibits keeping data longer than necessary. Here are our retention periods, and the reason for each.

Data	Period	Why this period
Account and profile	For the life of the account, then erased or anonymised within 30 days	Beyond that, no purpose remains
Orders, payments, invoices	10 years	Accounting and tax obligations
Delivery addresses	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 serves no purpose once verification is done
Proof of delivery and return (photo, code)	24 months	Covers the period during which a dispute may arise
Couriers' GPS position	90 days	To reconstruct a contested assignment
Safety alerts (SOS)	5 years	These may involve an accident at work
Published content (videos, reviews, comments)	Until deleted by you or by moderation	This is your material
Search and browsing history	24 months	Beyond that, worthless for recommendation
Exchanges with the assistant	12 months	Keeping the thread of a conversation, correcting errors
Technical and connection logs	12 months	Security and incident investigation
Notification tokens	Until revoked, or 12 months unused	An unused token is a dead token
Refusal of prospecting	No limit	We must remember that you said no

Some data outlives the deletion of your account where the law requires it (article 35): this is

the case for accounting records. The detail is set out on the
delete my account page.

Who receives your data

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

Other users

- The **seller** of an item you order receives your name, your phone number and your delivery address — without which they can neither prepare nor arrange delivery of your parcel.
- The **courier** assigned to your delivery receives your name, your phone number and the address.
- Your **public content** (reviews, videos, comments) is visible to everyone.

Our service providers

Provider	What it does	What it receives	Where
Wave	Payments and payouts	Amount, reference, phone number	Côte d'Ivoire
Google / Firebase	Verification SMS, Android notifications	Phone number, device token	Outside CI
Apple	iOS notifications	Device token	Outside CI
Expo	Notification delivery	Device token, notification content	Outside CI
OpenAI	Assistant, image description	Your message, the image or audio sent	Outside CI
Gcore	Delivery of photos and videos	IP address, file requested	Worldwide network
HostHatch	Hosting of the service	All of the data	London, United Kingdom

Provider	What it does	What it receives	Where
Delivery partner	Carrying out deliveries	Name, phone number, address	Côte d'Ivoire

The authorities

Upon a duly issued judicial request, or to report an offence of which we become aware.

Transfers outside Côte d'Ivoire

We must be clear about this. The server hosting Générale CI is located in

London, United Kingdom, and several of our providers (Google, Apple, OpenAI, Expo, 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 and the United States are such countries. 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 data protection authority. Article 7 likewise 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 those who need it, minimisation of what is sent to each provider, and encryption of the most sensitive data.

Your rights

Law No. 2013-450 grants you rights which we honour 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 give reasons**

where prospecting is concerned (art. 30).

- **To obtain erasure** of your data and the cessation of its dissemination — the right to digital oblivion (arts. 33 to 36). See delete my account.
- **To retrieve your data** in a structured, commonly used format, so as 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 the phone number of your account. We may ask you to prove your identity — this 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 character may be refused; in that case, it is for us to demonstrate that abuse (art. 29).

If you are not satisfied

You may refer the matter to the **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, holds

investigative powers and may order the rectification, erasure or blocking 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, access partitioned according to each person's role, and automatic blocking of repeated sign-in attempts.

No system is infallible. Should a breach of your data occur, we would inform you and the data protection authority.

Minors

Générale CI is not intended for persons under **18** (Ivorian law treats as a minor any person under eighteen). We do not knowingly collect their data. If you find that an account belongs to a minor, write to us: we will close it and erase the associated data.

Advertising and audience measurement

Générale CI provides for advertising tools — catalogue feeds, measurement tags on sharing pages, and transmission of conversion events to ad networks.

These tools are currently inactive. No third-party advertising tag is set and no event is transmitted to an ad network unless and until you have given explicit agreement. How this is intended to work, and what you would be consenting to, is described in our trackers 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 application before it takes effect. Successive versions remain available for consultation: 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 1.0 dated 27 July 2026.

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