



Record of Processing Activities (Art. 30 GDPR) — Slonto

CNIL template — 23/09/2026 — Version en

#	Purpose	Lawful basis	Retention	Sub-processors
1	Account & auth	Contract + legitimate interest	Active account + session purge	EU host
2	Training & SRS	Contract + legitimate interest	3 years inactivity (1095d)	Creator (their team)
3	Stripe payment	Contract	Anonymized 10y accounting	Stripe SCC
4	Brevo emails	Contract / legitimate interest	Counters purged	Brevo SCC
5	Bunny/Spaces video	Contract	As long as course exists	Bunny SCC / DO EU
6	Cookies & consent	Consent	Cookie 365d, IP deleted 365d	Internal

Safeguards: encryption, logical isolation per space, security headers, pseudonymization, rate limiting. Rights: export / erasure from Settings > Your data.