

Privacy Policy

Your privacy is our priority

Last updated: 11 October 2026 · Version 1.2

1. Data Controller

Field	Detail
Controller	Chun-Feng Pai, trading as "Cuenta & Cocina"
NIF	Y3566474Q
Address	Girona (Girona), Spain
Email	info@cuentaycocina.co
Activity	SaaS menu management and cost analysis software for restaurants

2. Data We Collect

2.1 Account data

- Email address and full name
- Password (stored as a hash — never in plain text)

2.2 Restaurant data

- Restaurant name · Country/region · Cuisine type
- Food cost target · Applicable VAT type

2.3 Operational data

- Ingredients: name, brand, price, unit, category
- Dishes and recipes: name, selling price, composition
- Purchase history, invoice metadata and sales data

2.4 Usage data

- Number of scans used · Active plan · Trial status
- Anonymous/pseudonymised usage events via PostHog EU. Disabled by default.

2.5 Billing data

- Payment references (Stripe IDs) — we never store card data

3. Legal Bases for Processing

Purpose	Legal basis
Account management and authentication	Contract performance (Art. 6.1.b GDPR)
Service delivery	Contract performance (Art. 6.1.b GDPR)
Subscription and payment management	Contract performance (Art. 6.1.b GDPR)
Transactional communications	Contract performance (Art. 6.1.b GDPR)
Usage analytics (PostHog)	Consent (Art. 6.1.a GDPR) — opt-out available
Prevention of free trial abuse	Legitimate interest (Art. 6.1.f GDPR)

4. Sub-processors

Provider	Service	Location	DPA
Supabase	Database and authentication	EU Frankfurt	Active
Vercel	Frontend hosting	EU Frankfurt	Active
Render	Backend hosting	EU Frankfurt	Active

OpenAI	AI analysis and recipes	USA (SCCs)	Active
Google Cloud Vision	Invoice OCR	EU	Active
Stripe	Payments and subscriptions	EU/USA (SCCs)	Active
Resend	Transactional emails	EU	Active
PostHog EU	Usage analytics	EU (eu.posthog.com)	Active
Cloudflare	CDN and security	Global + EU	Active

5. Data Retention

Category	Retention period
Account data	Until account deletion
Restaurant and inventory data	Marked as removed immediately · Permanently deleted after 30 days
Purchase history (invoice metadata, sales)	Deleted with restaurant · 30 days until permanent deletion
Invoice OCR text	Never stored — deleted from memory immediately after structured data extraction
Stripe payment references (transaction IDs, billed amounts)	Retained for 6 years after account cancellation (legal obligation)
Anonymous analytics data (PostHog)	Automatic deletion after 12 months · Immediate deletion upon account deletion

 **Two-phase deletion system:** When you delete an item, it is marked as removed and becomes invisible immediately across the entire application (filters, exports, reports, search). After 30 days, an automated process permanently deletes it from the database. Stripe payment data is retained for 6 years in accordance with Spanish tax law.

 **On invoices:** Cuenta & Cocina never stores the original invoice file or OCR text. Only structured extracted data is saved.

6. User Rights (Art. 15–21 GDPR)

Right	How to exercise it
Access (Art. 15)	Settings → Account → "Download my data" (JSON)
Rectification (Art. 16)	Edit in the app or contact info@cuentaycocina.co
Erasure (Art. 17)	Settings → Account → "Delete my account"
Portability (Art. 20)	Settings → Account → "Download my data"
Objection (Art. 21)	Contact info@cuentaycocina.co
Restriction (Art. 18)	Contact info@cuentaycocina.co

You may also lodge a complaint with the **AEPD** at www.aepd.es.

7. Security

- Encryption at rest: AES-256 (Supabase)
- Encryption in transit: TLS/HTTPS
- Row-Level Security (RLS) — each user accesses only their own data
- Passwords stored as bcrypt hash
- Automated deletion via pg_cron

8. International Transfers

Most data is processed within the EU. Transfers to the USA (OpenAI, Stripe) are carried out under **Standard Contractual Clauses (SCCs)** per Art. 46 GDPR.

9. Cookies and Tracking

Cookie	Type	Purpose	Duration
sb-* (Supabase)	Essential	Session management	Session / 7 days
cc-cookie-consent	Essential	Save cookie preference	1 year
PostHog (ph_*)	Analytics	Anonymous usage analysis	1 year

PostHog analytics cookies are **disabled by default**. We do not use advertising cookies. For more information, see our [Cookie Policy](#).

10. Minors

The application is intended exclusively for restaurant professionals. **It is not intended for anyone under 18**. Contact info@cuentaycocina.co if you become aware of this.

11. Data Breach Notification

In the event of a personal data breach, Cuenta & Cocina will:

- Notify the **Spanish Data Protection Authority (AEPD)** within **72 hours** of becoming aware of the breach (Art. 33 GDPR).
- If the breach poses a **high risk** to the rights and freedoms of affected users, notify them **without undue delay** by email, specifying the nature of the breach, the data affected, the measures taken, and recommendations to mitigate potential effects (Art. 34 GDPR).
- Internally document all breaches, including those not requiring notification, in accordance with the accountability principle.

12. Automated Decision-Making

Cuenta & Cocina uses automated processing for the following features:

- **BCG dish classification:** An algorithm that classifies menu items into categories (Star, Workhorse, Puzzle, Dog) based on cost and sales data entered by the user.
- **AI recommendations:** Suggestions generated by OpenAI to optimise the menu, based solely on the user's operational data.
- **Price alerts:** Automatic notifications when ingredient prices exceed thresholds configured by the user.

These features are **advisory only** and do not produce legal effects or binding decisions. The user retains full control over all business decisions. You can disable automatic notifications from Settings at any time.

13. Data Protection Officer

Given the nature and scale of our data processing, Cuenta & Cocina is not required to appoint a Data Protection Officer (DPO) under Article 37 of the GDPR. For any privacy-related enquiries, you can contact us directly at info@cuentaycocina.co.

14. Cookie Consent Mechanism

When you first visit our application, a **cookie banner** is displayed allowing you to accept or reject analytics cookies. Essential cookies (required for authentication) do not require consent. You can change your preferences at any time from our [Cookie Policy](#) or via the cookie management button in settings.

15. Contact

 **Email:** info@cuentaycocina.co
 **Address:** Girona, Catalonia, Spain
 **Web:** cuentaycocina.com

If the language versions of this text differ, the Spanish version prevails.

