Privacy policy

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DRAFT pending legal review — not the final version.

Who is the controller and who is the processor

At FlexiFlow we process personal data in **two different roles**. It helps to tell them apart:

Role	Which data	Who decides what it is used for
Controller	Your account, your access, your payments, use of the website and support	[OWNER NAME — PENDIENTE]
Processor	What you (or your accounting firm) store for your activity: invoices, customers, suppliers, expenses, bank movements, documents	You, or your firm: they are the controllers of that data and we process it only on their behalf

Controller (and processor, where applicable): [OWNER NAME — PENDIENTE], tax ID (NIF) [OWNER TAX ID — PENDIENTE]. Address: [ADDRESS — PENDIENTE]. Privacy contact: [PRIVACY EMAIL — PENDIENTE]. The owner is self-employed (an individual). We have not appointed a data protection officer.

My money (personal or household finances) is a personal-use feature: what you record there you use yourself. For that data we act as the platform's controller, and you decide what you enter.

What data we process, why and on what basis

The "legal basis" is the reason that allows the processing under article 6 GDPR.

Purpose	Data	Legal basis	How long
Create and manage your account and access	Name, email, company and tax ID if given, password (stored irreversibly hashed), team role	Performance of the contract (art. 6.1.b)	While you have the account
Provide the service you bought	Account data and data of the modules you use	Performance of the contract (art. 6.1.b)	While you have the account
Charge subscriptions and top-ups	Plan, amounts, Stripe customer ID; we do **not** store your card number	Performance of the contract (art. 6.1.b) and legal obligation (art. 6.1.c)	The periods required by accounting and tax rules
Service email: verify email, recover password, security notices, receipts	Email, name, notice content	Performance of the contract (art. 6.1.b)	The outbox log is kept for 365 days

if turned on, artificial intelligence): full list in Sub-processors.

- **Your accounting firm**, if you linked it by accepting its invitation. It can see what you share with it; you can end the link at any time.
- **Authorities**, when the law requires it.

We do not pass your data to other companies for their own purposes.

International transfers

Most data stays in the European Union (our server). The following may leave the EU:

1. **AI reading** (optional, only if you turn it on): United States. Safeguard:.
2. **Payments with Stripe**: Stripe may process data from outside the EU with the safeguards it states in its terms.

How long we keep data

- **Session:** 14 days or until you sign out.
- **System email (outbox):** 365 days.
- **Reader page images:** deleted after 90 days and regenerated when the invoice is opened.
- **Original documents and activity data:** while you have the account.
- **Backups:** rotated; deleted data may remain in encrypted backups during the rotation cycle.

What happens when you delete the account

You can ask for deletion in "My account". There is a **grace period of 14 days** in which you can cancel it. After that, your users, sessions, customers, expenses, settings and other data are deleted. **Kept**: issued invoices and their records, payment receipts and the proof of deletion, for as long as the law requires, and blocked for other uses.

Your rights and how to exercise them

You can ask for **access, rectification, erasure, objection, restriction of processing and portability** of your data, and withdraw any consent you gave (articles 15 to 22 GDPR).

- **Yourself, in the app:** in "My account" you can export your data and ask for your account to be deleted.
- **By email:** write to [PRIVACY EMAIL — PENDIENTE] saying which right you want to exercise. We may ask you to prove who you are.
- **Deadline:** we reply within one month at most; if the request is complex or there are many, it can be extended by two more months, and we will tell you.
- **If your firm or business processes your data** (for example, you are a customer of an accounting firm), send your request to it, as it is the controller; we will help it to handle it.

Complaints: if you think we have not handled your data properly, you can complain to the Spanish Data Protection Agency (AEPD): www.aepd.es.

Security

We apply reasonable technical and organisational measures: encrypted connection (HTTPS), passwords stored with a salted hash, role-based access control, separation of each account's data, limits on sign-in attempts and encrypted backups. Details are in the security annex of the Data processing agreement. No system is infallible: if a breach affects you, we will tell you as the law requires.

Minors

The service is intended for adults and their professional activity.

Changes to this policy

Each version has a number and a date. For an important change, we will tell you inside the application and ask you to review it. You can see what you accepted in "My account → Legal documents".