

# PRIVACY POLICY

**Effective Date:** 01 Aug 2025

**Last Updated:** 01 Aug 2025

FL3XX GmbH ("FL3XX", "we", "our", or "us") is committed to protecting your personal data. This Privacy Policy explains how we collect, use, share, and protect your personal data when you interact with us via our websites, mobile apps, or services, in accordance with applicable data protection laws, including the EU General Data Protection Regulation (GDPR).

## 1. Who We Are

**Controller:**

FL3XX GmbH

Kolingasse 11

1090 Vienna, Austria

Email: [legal@fl3xx.com](mailto:legal@fl3xx.com)

If you have questions or concerns about this Privacy Policy or how we handle your data, reach out to us.

Our appointed **Data Protection Officer (DPO)** can be contacted at the above address or via email.

## 2. What Data We Collect

Depending on how you interact with us, we may collect:

- **Identification data:** name, email address, company name, job title
- **Contact data:** phone number, mailing address
- **Authentication data:** login credentials, IP addresses
- **Usage data:** device data, browser type, pages visited, time spent, interactions
- **Communication data:** messages, support inquiries, chat logs
- **Employment data (for applicants):** CV, work history, qualifications

We do not knowingly collect personal data from children under 16.

## 3. How We Collect Your Data

- You provide it directly (e.g. when contacting us, signing up, or using our platform)
- It is collected automatically via cookies or analytics tools
- It may come from third-party integrations or business partners (e.g. CRM platforms)

## 4. Purposes and Legal Bases for Processing

Purpose	Legal Basis (Art. 6 GDPR)
Provide and manage services	Contractual necessity (art. 6(1)8b))
Respond to inquiries	Legitimate interest (art. 6(1)(f))
Analyze and improve our website/services	Legitimate interest (art. 6(1)(f)); Consent (cookies)
Send marketing emails (where opted in)	Consent (Art. 6(1)(a))
Fulfill legal obligations	Legal obligation (Art. 6(1)(c))
Recruit personnel	Pre-contractual steps (Art. 6(1)(b))

## 5. Data Sharing and Recipients

We may share your data with:

- Our affiliated companies and processors supporting service delivery
- Trusted third-party vendors (e.g. Amazon Web Services, HubSpot, Google Workspace)
- Legal or regulatory authorities if required by law
- External auditors for compliance (ISO, SOC2)
- Only where necessary, and always under appropriate safeguards

## 6. International Transfers

Some data may be processed outside the EEA (e.g. U.S.-based vendors). **We use EU Standard Contractual Clauses (SCCs)** and other safeguards to ensure your data is protected.

## 7. Cookies and Tracking

We use cookies and similar technologies for:

- Website functionality
- Analytics (e.g. HubSpot, Smartlook)
- Improving user experience

You can manage cookie preferences through your browser or by using our cookie banner.

## 8. Data Retention

We retain personal data only as long as necessary to fulfill the purposes above or comply with legal obligations. After that, data is securely deleted or anonymized.

## 9. Your Rights Under GDPR

You have the right to:

- Access your personal data (Art. 15)
- Rectify inaccurate data (Art. 16)
- Erase your data (“right to be forgotten”) (Art. 17)
- Restrict or object to processing (Art. 18, 21)
- Data portability (Art. 20)
- Withdraw consent at any time (Art. 7(3))
- Lodge a complaint with a supervisory authority (e.g. Austrian DSB)

To exercise these rights, contact us at [legal@fl3xx.com](mailto:legal@fl3xx.com). We may request proof of identity before responding.

## 10. Data Security

We implement appropriate technical and organizational measures (TOMs) aligned with ISO 27001 and SOC 2 standards, including:

- Encryption
- Role-based access controls
- Regular audits and risk assessments
- Data breach response procedures

## 11. Changes to This Policy

We may update this Privacy Policy from time to time. Updates will be posted here with a revised effective date. We encourage you to review it periodically.