

## **DATA PROTECTION**

The Users acknowledge that the Operator processes the personal data provided by them for the purpose of operating the Platform in accordance with the legal provisions relating to the processing and protection of personal data, in particular, but not exclusively, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter referred to as "**GDPR**"), Act No, on the processing of personal data, as amended, and any judicial or administrative interpretation of legislation relating to the processing and protection of personal data, any guidelines, codes of conduct or approved certification mechanisms issued by the Data Protection Authority. Details regarding the processing of Users' personal data by the Operator are set out on the Platform.

Personal Data means any information about an identified or identifiable natural person, in particular a User or his contact person; an identifiable natural person is a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, a network identifier or to one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The User acknowledges and agrees that the Operator will process the personal data provided to the extent of (i) first and last name, (ii) email, (iii) telephone number and (iv) other identification and address data provided by the User. The Operator only processes personal data provided by the User.

The processing of personal data by the Operator is lawful, as at least one of the following conditions is always fulfilled during the processing:

- a) The User has given consent (or has secured the consent of other relevant persons) to the processing of personal data
- b) the processing of the personal data is necessary for compliance with a legal obligation to which the Operator is subject; or

- c) the processing of personal data is necessary for the purposes of the legitimate interests of the Operator

The Operator processes personal data for the following purposes:

- a) for the purpose of providing services and fulfilling the Operator's contractual obligations, the Operator may process personal data provided by the User or provided in the future by using its services. This processing of personal data is necessary for the performance of the contract;
- b) The Operator may process personal data that are necessary to assert possible claims of the Operator and also to protect the Operator's rights; such processing of personal data is a legitimate interest of the Operator.

The Operator stores personal data for the purpose of providing services and fulfilling contractual obligations.

The Operator retains personal data in order to protect its rights

- a) above for as long as its legitimate interest lasts.

Therefore, the Operator shall only retain the personal data provided by the User for the period necessary to exercise the rights and obligations arising from the legal relationship between the parties to the contract or until the withdrawal of consent to the provision of personal data (if such withdrawal of consent implies an obligation for the Operator to delete the personal data). After this period, the personal data shall be deleted by the Operator.

The personal data provided by the User may be transferred by the Operator to other processors who supply consulting, marketing and other services to the Operator, but always in accordance with the above purposes.

Based on the rules set out in the GDPR, the data subject has in particular the right to:

- a) access to his/her personal data
- b) the rectification of personal data or, where appropriate, the restriction of their processing;
- c) erasure of personal data;
- d) object to the processing of personal data;
- e) the portability of their personal data;
- f) withdrawal of consent to the processing of personal data;

In order to exercise any of these rights, the User may contact the Operator via email: [info@flowlance.com](mailto:info@flowlance.com). The Operator will provide Users with assistance in exercising their rights.

The Operator declares that it has taken appropriate technical and organizational measures to secure the personal data provided by the User.

The Operator declares that only persons authorized by the User have access to the personal data provided by the User.

Disclosure: (App's) use and transfer of information received from Google APIs to any other app will adhere to [Google API Services User Data Policy](#), including the Limited Use requirements.

These terms and conditions are effective from 22.3.2023