Privacy Policy – Fylux Digital Solutions

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1. Who is the controller

The controller of the personal data described in this policy is Fylux Digital Solutions ("**Fylux**", "**we**"). The full identification of the legal entity (company name, tax number and registered office) is stated in proposals, contracts and invoices and is provided to any data subject who asks for it.

For any question about privacy or to exercise your rights, email hello@fyluxds.com with "Data protection" in the subject line. Given the size and nature of its processing activities, Fylux is not required to appoint a Data Protection Officer; privacy matters are handled directly by management.

The Portuguese version of this policy is the reference version. This English version is provided for convenience; in the event of any discrepancy, the Portuguese version prevails.

2. Who this policy applies to

This policy applies to personal data that Fylux processes as controller, namely of:

- Visitors to the fyluxds.com website and its pages;
- People who contact us through the form, by email, phone or WhatsApp;
- People who book a call through our booking page;
- Clients and prospective clients, and their representatives and staff;
- Users of the client area (clients.fyluxds.com);
- Suppliers and partners, to the extent required by the business relationship.

Data of our clients' customers

When Fylux builds an assistant that serves a business's customers (for example, someone calling a barbershop or messaging a clinic), that business is the controller of the data, and Fylux processes it only on its behalf and according to its instructions, as **processor**. That processing is governed by the Data Processing Agreement signed with the business. If you were served by one of our clients' assistants, please contact that business first; if you contact us, we will forward your request.

3. What data we collect

Category	Examples	Source
Identification	First name, surname, company, job title	Provided by you
Contact	Email, phone, business address	Provided by you
Content of communications	Form message, emails, notes from the initial call	Provided by you

Category	Examples	Source
Bookings	Date and time chosen, service, notes you add, video call link	Booking page
Billing	Tax number, billing address, payment history, payment references	Provided by you and by the payment provider
Account and security	Credentials (encrypted), sign-in logs, two-factor authentication, audit logs	Client area
Technical data	IP address, browser and device type, pages visited, date and time of access	Collected automatically
Preferences	Chosen language, cookie choices, communication preferences	Collected automatically and from your choices

We do not ask for, and do not wish to receive, special categories of data (for example, health data, racial origin or religious beliefs). Please do not include them in messages you send us.

Fylux's services are intended for professionals and businesses. We do not knowingly collect data from children under 16.

4. Why we use the data and on what legal basis

Purpose	Data	Legal basis (GDPR)
Replying to contact requests and preparing proposals	Identification, contact, content	Pre-contractual steps at the data subject's request (Art. 6(1)(b)) or legitimate interest in replying (Art. 6(1)(f))
Managing initial-call bookings and sending confirmations and reminders	Identification, contact, bookings	Pre-contractual steps (Art. 6(1)(b))
Providing the contracted services and support	Identification, contact, content, account	Performance of a contract (Art. 6(1)(b))
Invoicing, accounting and tax compliance	Identification, billing	Legal obligation (Art. 6(1)(c))
Running the client area and keeping it secure	Account and security, technical data	Performance of a contract and legitimate interest in protecting our systems (Art. 6(1)(b) and (f))
Preventing fraud, spam and abuse	Technical data, content	Legitimate interest (Art. 6(1)(f))
Measuring use of the website to improve it	Technical data (analytics cookies)	Consent (Art. 6(1)(a))

Purpose	Data	Legal basis (GDPR)
Sending news about our services	Identification, contact	Consent (Art. 6(1)(a)) or, for clients, legitimate interest in promoting similar services (Art. 6(1)(f) and Art. 13-A of Portuguese Law no. 41/2004)
Defending our rights in a dispute	Data relevant to the case	Legitimate interest (Art. 6(1)(f))

Where the basis is legitimate interest, we have weighed that interest against your rights, and you may object to the processing (see section 10). Where the basis is consent, you may withdraw it at any time, without affecting processing already carried out.

We do not make decisions based solely on automated processing that produce legal effects concerning you or similarly significantly affect you.

5. Marketing communications

We only send marketing communications to people who have agreed to receive them or to clients, about services similar to those already contracted. Every communication includes a simple way to unsubscribe. You can also ask us at any time at hello@fyluxds.com.

6. Who we share data with

We do not sell or rent personal data. We share it only with:

- **Service providers (processors)** that help us operate, always under a contract requiring them to process data only on our instructions and with appropriate security measures;
- **Certified accountant and advisers** (legal, tax), who are bound by professional secrecy;
- **Public authorities, courts or regulators**, where required by law;
- **A potential buyer** of the business, in the event of a merger or sale, who will be bound by this policy.

Main providers currently used:

Provider	Service	Main location
Vercel Inc.	Hosting of the website and client area	Global network; data served from the nearest region
Supabase Inc.	Database and authentication	EU region, where available
Resend Inc.	Transactional email (confirmations, notifications)	USA
Stripe Payments Europe Ltd.	Card payment processing	EU (Ireland), with transfers to the USA
Google Ireland Ltd.	Calendar, video calls (Google Meet) and business email	EU, with transfers to the USA

This list may change as our services evolve. The current version is available on request.

7. Transfers outside the European Economic Area

We prefer providers and regions within the European Union. Where a provider processes data outside the European Economic Area, the transfer is based on an adequacy decision of the European Commission (including the EU-US Data Privacy Framework, for certified companies) or on Standard Contractual Clauses approved by the Commission, supplemented by additional measures where necessary. You may ask us for a copy of the applicable safeguards.

8. How long we keep data

Situation	Retention period
Contact requests that did not lead to a contract	Up to 12 months after the last contact
Initial-call bookings	Up to 12 months after the call, unless it leads to a proposal
Proposals not accepted	Up to 2 years after issue
Client data for contract performance	For the duration of the contract and up to 5 years afterwards, to defend our rights (general limitation period for commercial claims)
Invoices and accounting records	10 years, as required by Portuguese tax law
Security and access logs	Up to 6 months, unless needed to investigate an incident
Consent to marketing communications	Until withdrawn or until 2 years without interaction
Cookie choices	12 months, after which we ask again

At the end of these periods, data is deleted or irreversibly anonymised.

9. How we protect data

We apply technical and organisational measures appropriate to the risk, including:

- TLS (HTTPS) encryption across the website and the client area;
- Encryption at rest at our hosting and database providers;
- Client access credentials stored in an encrypted vault, with key rotation;
- Access control based on least privilege and two-factor authentication on internal accounts;
- Audit logs of relevant actions in the client area;
- Regular backups and recovery procedures;
- Training and confidentiality commitments for everyone with access to data.

In the event of a personal data breach that poses a risk to your rights, we notify the Portuguese Data Protection Authority (CNPD) within 72 hours and, where the risk is high, we inform you directly.

10. Your rights

Under Articles 15 to 22 of the GDPR, you have the right to:

- **Access**: find out whether we process your data and obtain a copy;
- **Rectification**: correct inaccurate or incomplete data;
- **Erasure**: ask for your data to be deleted when it is no longer needed or the processing has no legal basis;
- **Restriction**: ask us to suspend processing while an issue is being checked;
- **Portability**: receive the data you gave us in a structured, commonly used format, or ask us to send it to another organisation;
- **Objection**: object to processing based on legitimate interest and, at any time, to direct marketing;
- **Withdraw consent** at any time, where processing is based on it.

To exercise these rights, write to hello@fyluxds.com. We reply within one month, which may be extended by two further months for complex requests, in which case we will tell you. Exercising your rights is free of charge, except for manifestly unfounded or excessive requests. We may ask for additional information to confirm your identity.

You also have the right to lodge a complaint with the **Comissão Nacional de Proteção de Dados (CNPD)**, Av. D. Carlos I, 134, 1.º, 1200-651 Lisbon, Portugal, www.cnpd.pt.

11. Cookies and similar technologies

11.1 What they are

Cookies are small files stored in your browser when you visit a website. We also use the browser's local storage to save choices. Together, we call them "cookies".

11.2 Which cookies we use

Type	Purpose	Examples	Duration	Consent
Essential	Remember your chosen language, store your cookie choices, keep you signed in to the client area and protect forms	site_lang, fylux_cookie_consent_v1, FYLUX_COOKIE_CONSENT, client-area session cookies	Session to 12 months	Not required
Analytics	Understand which pages are visited and how the site performs, in aggregate	Audience measurement tools, when active	Up to 13 months	Required

We do not use advertising cookies or share browsing data with ad networks. If we start using other categories in the future, we will update this policy and ask for your consent before enabling them.

11.3 How to manage them

You can accept or refuse analytics cookies in **"Cookie settings"**, in the website footer, and change your mind at any time. You can also delete or block cookies in your browser settings; blocking essential cookies may stop parts of the site from working.

12. Links to other websites

The website may contain links to third-party websites (for example, client websites in our portfolio, Google or social networks). We are not responsible for the privacy practices of those websites and recommend that you read their policies.

13. Changes to this policy

We may update this policy to reflect legal, technical or service changes. The date of the current version appears at the top. When changes are material, we notify clients by email and highlight the change on the website.

14. Contact

Fylux Digital Solutions · hello@fyluxds.com · fyluxds.com