

Flamelink Privacy Policy

Registered Business: Flamelink B.V
North Holland, 1721 PW
Netherlands
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Privacy

This document contains the rules and restrictions that govern your use of our website(s) and the Flamelink Software as a Service (the “Flamelink Service” or “Flamelink Services”). It is Flamelink’s policy to respect your privacy regarding any information we may collect while operating our website(s) and the Flamelink Software as a Service and using our Services in accordance with applicable laws.

“Customers” are persons who, on behalf of themselves or an entity request information from us regarding the Website or Flamelink Service either for a limited time free trial or by purchasing the Flamelink Service.

For purposes of this Privacy Policy, we are the Data Controller only with respect to our sales and billing operations and any interactions with Visitors or Customers via our website(s) and the Flamelink Software as a Service.

In the course of Customers using the Flamelink Service, their customers, members, contractors or employees (“End Users”) may provide personally identifiable information to us using the Flamelink Service via Customer websites or applications.

Your rights

You have the following rights towards us regarding your personal data:

- Right to information
- Right to correction or deletion
- Right to restrict processing
- Right to object to the processing
- Right to data transferability
- Right to be forgotten

Please send an email to legal@flamelink.io in order to exercise one or more of the aforementioned rights. If you believe that the processing of personal data concerning you violates the GDPR, you have the right of appeal to a supervisory authority, without prejudice to any other remedies.

Information about the processing of your data

In accordance with Article 12 of the General Data Protection Regulation (hereinafter referred to as the GDPR), we are obliged to inform you about the processing of your data when you use our website or services. We take the protection of your personal data very seriously, and this privacy policy informs you about the details of the processing of your data and about your legal rights in this regard.

Changes

The Privacy Policy may need to change along with the Flamelink Service. We reserve the right to change the Privacy Policy at any time and if we do, we will bring it to your attention by placing a notice on the Flamelink Service, and/or by sending you an email and/or by some other means. If you choose to reject the Privacy Policy before or after changes you will no longer be able to use the Flamelink Service. Flamelink will inform the user if any part of the processing or information previously given to the data subject has changed, since user has given consent and would have to provide consent on the changed policy.

Information you provide to us

We may receive and store any information you knowingly provide to us, including information you post on our Services and information in correspondence with us. For example, we may collect Personal Information such as your name and email address. Certain information may be required to use our Flamelink SaaS.

Security

We have taken comprehensive technical and organisational precautions to protect your personal data from unauthorised access, abuse, loss and other external disruption. To this end, we regularly review our security measures and adapt them to current standards.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. In particular, you acknowledge that Flamelink is not responsible for any loss of any passwords or login information which you receive for access to Flamelink Services which results from your failure to keep that information secure.

Although we believe our security methods are adequate, you acknowledge that no security methods are perfect and that any transfer of information is at your own risk.

Personal data

Customers who access Flamelink's Services choose to interact with Flamelink in ways that require Flamelink to gather personally-identifying information such as name, address (email or physical), credit card billing information, username, passwords. The amount and type of information that Flamelink gathers depends on the nature of the interaction.

We ask Visitors who sign up for an account at Flamelink or who have questions to provide a username and email address.

Those who engage in transactions with Flamelink by purchasing access to the Flamelink platform to use the SaaS or sign up for the free tier - are asked to provide name, address and additional payment and billing information (e.g. purchase order or bank information) and user name and password. Once signed up and the SaaS is purchased, Customer employees or contractors will be asked to provide their name and email address and a password.

Transmission of personal data for credit card payments. In principle, your personal data is only passed on to the extent necessary for the execution of the payment contract. Specifically, for payment processing, we transmit the payment data required for this to the bank commissioned with the payment or, if applicable, to the payment and invoicing service provider commissioned by us.

We also collect Customer content and track Customer usage of the SaaS and other Services as part of the Services.

The information you can view, update, and delete may change as the SaaS changes. The following details are captured:

User details

- sign up date for Flamelink
- last active date
- email address
- first name, last name, display name
- linked Firebase projects (including the Firebase Auth UID for their project)

Project Details

- active / inactive state
- encrypted connection config
- sign up date
- database type (realtime db or cloud firestore)

- project ID
- project Flamelink alias
- project CMS users (enabled state and type - either `OWNER` or normal `USER`)
- billing plan/subscription
- available features

Billing

- customer ID
- customer type (business or individual)
- billing contact name

If you have any queries regarding your Personal Data, please feel free to contact us at legal@flaemlink.io.

How we use your information

Visitors

For Visitors, if you do not purchase the SaaS but want information, we use your contact information to follow up on your request. We may also ask your consent to communicate with you regarding the provision of services or notify you about new services, changes and Improvements.

Customers

- To Provide the Services
With respect to our Customers and their account users, Flamelink does not disclose personal identifying information for marketing purposes other than as described below. We use such personal data, as well as Tracking Information connected with your personal data for purposes of account and services administration and providing the Services. If you provide your Billing information, we will use that information to charge you for the Services you purchase.
- Fraud and SaaS stability and security
We use Personal Data, Tracking Information, and your usage history to detect fraud, abuse, violation of our contract terms, violation of any laws, rules or regulations, to ensure the stability and security of our Services, to protect the rights, property or safety of Flamelink or to protect public safety and threats to public health
- Direct Marketing and Updating You Regarding the Use of the Services
We will use Customer contact information to contact you via email or by phone, if necessary, to let Customers know about Services we provide, new Services or features or to update you regarding Customer use of the Services.

- **To Improve the Quality of Services**
We use Tracking Information and usage history to improve the quality of our Services, including, but not limited to user experience.
- **Aggregated Statistics**
To the extent permitted by law, Flamelink will use Tracking Information to compile and/or create for analytical purposes, statistical, aggregated data relating to our users and the Sites and Services and display or share this information. Aggregated data is derived from Personal Information and Tracking Information but in its aggregated form it is de-identified in a manner so that it cannot be used to identify any individual or individuals. This data is used to understand our customer base, their needs, to develop, improve, and market our services.

How we will share information

We will not sell, rent, or share Personal Data with third parties outside of our company without your consent, except in the following ways:

- **Law Enforcement and Internal Operations**
Personal Data, Tracking Information, Content and End User Data may be provided where we are required to do so by law, or if we believe in good faith that it is reasonably necessary (i) to respond to claims asserted against Flamelink or to comply with the legal process (for example, discovery requests, subpoenas or warrants); (ii) to enforce or administer our policies and agreements with users; (iii) for fraud prevention, risk assessment, investigation, customer support, product development and debugging purposes; or (iv) to protect the rights, property or safety of Flamelink, its users or members of the general public. We will use commercially reasonable efforts to notify users about law enforcement or court ordered requests for data unless otherwise prohibited by law. However, nothing in this Privacy Policy is intended to limit any legal defenses or objections that you may have to any third party request to compel disclosure of your information.
- **Business Transfer**
Flamelink may sell, transfer or otherwise share some or all of its assets, including your Personal Data, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy. Under such circumstances, Flamelink will use commercially reasonable efforts to notify its users if their personal information is to be disclosed or transferred and/or becomes subject to a different privacy policy.
- **Third Parties**
We sometimes contract with other companies and individuals to perform functions or services on our behalf, such as software maintenance, data hosting, sending email messages, etc. We necessarily have to share your Personal Data with such third parties as may be required to perform their functions. We take steps to ensure that these parties take protecting your privacy as seriously as we do, including entering into Data Processing Addendum, EU Model Clauses and/or ensuring they have EU-U.S. and Swiss-US Privacy Shield certification.

Third party service providers

Here is a list of the third party tools and applications we use which may collect Personal Data or Tracking Information from you directly on our behalf and share it with us

- We use Intercom in connection with our Sites and Services to store and track usage statistics, support conversations and contact information such as name and email in connection with those support live chat conversations. Intercom is used for customer support purposes. In particular, we provide a limited amount of your information (such as sign-up date and some personal information like your email address) to Intercom, Inc. (“Intercom”) and utilize Intercom to collect data for analytics purposes when you visit our website or use our product. As a data processor acting on our behalf, Intercom analyzes your use of our SaaS and tracks our relationship by way of cookies and similar technologies so that we can improve our service to you. For more information on Intercom's use of cookies, please visit <https://www.intercom.com/terms-and-policies#cookie-policy>. We may also use Intercom as a medium for communications, either through email, or through messages within our product(s). As part of our service agreements, Intercom collects publicly available contact and social information related to you, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses, to enhance your user experience. Processing takes place in the United States. Intercom is self-certified under the US-EU Privacy Shield and we have entered into a Data Processing Addendum with them. For more information on the privacy practices of Intercom, please visit their privacy policy. Intercom's services are governed by Intercom's terms of use which can be found at <https://www.intercom.com/terms-and-policies#terms>.
- We also use Mailchimp to send you emails after you sign up for the Services or use the SaaS if you indicate an interest in receiving information and track your interaction with those emails based on the email address Customers provide to us. Mailchimp is also self-certified under the US-EU Privacy Shield program and we have a Data Processing Addendum with EU Standard Contractual Clauses in place with them. If you wish for us to remove yourself, just follow the instructions at the bottom of the email communications. For more information on Mailchimp, follow the link to <https://mailchimp.com/legal/privacy/>.
- We use Profitwell to analyse SaaS Metrics. It is only for overall aggregated usage and data analysis to improve the product and service. No customer specific use. <https://www.profitwell.com/terms-security>
- We use Stripe to capture, store and manage payment processes when users sign-up with a subscription plan. Stripe handle the security of your billing details. Stripe is also self-certified under the US-EU Privacy Shield program and we have a Data Processing Addendum with EU Standard Contractual Clauses in place with them. For more information on Stripe, follow the link to <https://stripe.com/us/privacy>
- Quaderno integrates directly with Stripe and handles the Tax calculations, sales invoices & receipts and sales tax return-ready reports for Flamelink user subscriptions. Quaderno values your Privacy and strives for its services to be safe and enjoyable for everyone. Quaderno's Policy explain how they collects and processes personal data, the purposes for processing and how they protect it. For more information on Quaderno, follow the link to <https://quaderno.io/privacy/>

- We use SendGrid to send transactional and notification emails related to our Services, such as sign-up confirmations, password resets, and updates regarding your account. SendGrid processes your email address and related data to deliver these communications. Processing takes place in the United States and the European Union, and SendGrid has implemented appropriate safeguards, including Standard Contractual Clauses, to ensure compliance with GDPR. For more information on SendGrid's privacy practices, please visit <https://www.twilio.com/legal/privacy>.

Your information choices

- **Right to Review and Rectify Your Personal Data**
Customers can update most of their Personal Data by logging on to their account. However, if additional assistance is required to change or delete inaccuracies within your Personal Data or you would like to know what information about you was collected, please contact us at legal@flamelink.io.
- **Right to Remove**
You may request that we delete your Personal Data or remove your Data completely from the Flamelink Service. You can delete your Personal Data by logging into your account and deleting your account.
If you receive communications from us and no longer wish to receive them, please follow the removal instructions in the email or change your account settings.
However, since your Personal Data is required for us to provide the Services to you, deleting it, especially your email address and billing details if assigned to a subscription plan, will also terminate your access to the services. Deleting your Personal Data does not mean that all of it will be removed. We may be required by law, to retain your data to exercise or defend legal claims, fulfill contractual obligations with our customers; retain some information in connection with our obligation to provide the Services. We may de-identify and anonymize some data for purposes of retaining it.

Third party links and services

The Website and SaaS may contain links to other websites and services or use services not provided by Flamelink. Flamelink cannot be, and is not responsible for the use of data, privacy practices or the content of those websites or services. You should be aware of this when you leave our site and be sure to review the privacy statements of each website you visit that collects information. This Privacy Policy applies solely to personal information collected by Flamelink.

Processing and transmission of personal data when subscribing to our services

If you wish to subscribe to the Flamelink service, it is necessary for the initiation and conclusion of the contract that you provide personal data such as your name, your address and your email address. The mandatory data required for activating the subscription is marked as such; further information is provided voluntarily. We process your data for order processing; in particular, we will forward Payment data to the payment service provider or our main bank through Stripe. To prevent unauthorised third parties from accessing your personal data, the order process on the website is encrypted using TLS technology.

You can voluntarily create a user account in which we store your data for future visits to the website. When you create a user account, the data you enter is processed. Once you have successfully logged in, you are free to edit or delete all other data, including your user account.

As soon as processing is no longer necessary, we delete the data generated in this context or, if statutory retention obligations apply, restrict processing of the data. Due to mandatory commercial and tax regulations, we are obliged to keep your address, payment and subscription data for a period of ten years.

User under the age of 16

The Sites and Services do not knowingly collect personal information from users under the age of 16 nor are they intended to be used by anyone under 16. If you are under the age of 16, you are not permitted to use the Sites and Services or to disclose Personal Information using the Sites and Services. If we learn we have collected or received Personal Information from a child under 16, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at legal@flamelink.io.

If you have any questions or concerns regarding our privacy policy, please send us a detailed message, and we will try to resolve your concerns.

Team Flamelink