

Flow Space

Website Privacy Policy

Last Updated: November 2024

At Flow Space Limited, (“**Flow Space**”, “**we**”, “**us**” or “**our**”), we are committed to respecting your privacy and protecting the personal data that we obtain and hold about you and others.

This privacy policy (“**Policy**”) explains how we will process the personal data relating to you that you provide to us when you visit our website, namely the website at www.flowspace.co (the “**Website**”) or in relation to any query or communication that you may send to us, or that we may collect from others about you when you visit the Website.

1. Introduction

The Website is operated by Flow Space Limited, incorporated and registered in England and Wales with company number 12786708 whose registered office is at 3 Arlington Road, Teddington, TW118NL. The Website allows existing and new customers and users to Flow Space, among other things (“**Services**”).

Where we decide the purpose or means for the processing of the personal data that you provide when using the Website, we are the “data controller” for the purposes of the applicable legislation including European General Data Protection Regulation 2016/679 (“**GDPR**”).

You have the right to object to the processing of your personal data at any time. For further information please see section 1.

The Website may contain hyperlinks to third party websites. These websites operate fully independently from us, and we cannot accept any responsibility or liability for the privacy practices of such third parties nor the availability of these external websites or resources. The appearance of such links on the Website is not an endorsement. Should you use any of these websites, such use is at your own risk and we would recommend that you review their respective privacy policies.

2. What personal data do we collect about you?

Personal Data provided by you when using the Website

You may give us information about you when filling in forms or contacting us via email and other similar inquiries. This may include:

- Identity and contact data: including your name, address, email address, the organisation on behalf of whom you are contacting us (if applicable); and telephone number.
- Correspondence: including any information you submit to us in messages when you get in touch with us.

Job Applications

As part of any recruitment process, we collect and process personal data relating to job applicants. Such data may include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements.

We may collect this information in a variety of ways. For example, personal data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Analytics Information

The Website use cookies and other mechanisms to collect and log analytical information, to help analyse how visitors use the Website and to compile statistical reports on website activity. This processing is crucial to the running of our business. Please see our cookie policy for more information.

When you visit the Website, our analytics service providers may collect the following data:

- number of visitors to the Website;
- pages visited while at the Website and time spent per page;
- page interaction information, such as scrolling, clicks and browsing methods;
- websites where visitors have come from and where they go afterwards;
- page response times and any download errors; and
- other technical information relating to end user device, such as IP address or browser plugin.

Should you visit social media pages and choose to follow or connect with us on social media, we may receive personal information from the social media providers (depending on your social media privacy settings), including:

- your name (and/or your social media unique user name);
- your email and/or postal address;
- your telephone number(s);
- IP or MAC address;
- your gender and/or age; and
- your general interests and preferences

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please see our cookie policy.

3. How we use your personal data?

Providing the Services to you as a prospective or existing Client

In line with the legitimate interest we have in promoting and operating our business we may process personal information to administer and to deliver our Services to clients.

This may include setting up and arranging access to client accounts, providing support services, and administering and managing our internal records.

Contacting Us (Your Enquiries)

If you contact us via the Website, to make an enquiry or otherwise, in line with the legitimate interest we have in promoting our business, we will process your enquiries to reply to your query, including providing you with information about the Services we offer.

We may also process enquiries to take steps you ask of us with a view to entering into an agreement to provide our Services.

You are under no obligation to provide us with any details, but if you choose to not provide us with relevant information, we may not be able to respond and/or provide the assistance that you request.

Mailing List

In line with the legitimate interest we have in promoting our business, we will use the email address you give us to provide you with news and updates about our Services via email. If you would like to be removed from our mailing list, please let us know by clicking unsubscribe at the bottom of any marketing email that you receive from us.

There may also be circumstances where we will ask you for your prior consent in which case you will be notified at the time.

How You Use the Website (Analytics & Cookies)

When you visit the Website we will use analytics information for the following purposes: analytics, website traffic optimisation and distribution, tag management, content performance and features testing (A/B testing). Please see our cookie policy for more information.

This analysis is fundamental to the running of our business and we therefore undertake such monitoring in the pursuit of our legitimate interests in improving the Website, and to provide a better service and source of information to visitors, or consent.

Recruitment

If you apply for a job with us, we will use your personal data to conduct our recruitment process, including assessing your skills, qualifications and suitability for the role and/or communicating with you about the recruitment process.

We need to process this information to take steps at your request prior to entering into a contract with you.

In some cases, we need to process personal data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the location of our offices before employment starts.

We also have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm an applicant's suitability for employment and decide to whom to offer a job.

All content you submit to us

If you send us objectionable content or otherwise behave in a disruptive manner when using the Website, we may process personal data included in your messages to respond to and stop such behaviour.

We only process personal data in this way for the legitimate interests of ensuring that use of the Website is lawful, does not disrupt our systems, does not harass our staff or other individuals, and to enforce our legal rights and to comply with our legal obligations.

Where we reasonably believe you are or may be in breach of the law (for instance, because content you send amounts to harassment or is defamatory), we may use your personal data to inform relevant third parties such as your email/internet provider or law enforcement agencies about the content.

Where we process personal data in this way, we will hold that personal data on our systems for as long as is reasonably necessary to achieve these objectives.

4. Do we share your personal data with anyone else?

Customer. We may disclose your personal data to your employer that is our customer in accordance with our SaaS agreement.

Suppliers, subcontractors, service providers. We keep your personal data confidential, but may disclose it to our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Policy and provision of services. If we provide your personal data to third parties, we shall only do so provided that they do not make independent use of the information and provide the same confidential treatment as we do.

We only permit them to process your personal data for specified purposes and in accordance with our instructions. All our third-party service providers are required to take appropriate security measures to protect your personal data.

Third Party Processors

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io."

"Digital Marketing Service Providers

Government authorities. In addition, we may disclose your personal data to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Potential acquirers or investors. If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the personal data we hold may be included as part of that sale, in which case you will be notified via email, your account and/or a prominent notice on the Website of any changes in ownership or use of your personal data, as well as any choices you may have.

Except as provided above, we will not provide your personal data to third parties.

1. Your right in relation to personal data which we process

You have the following rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest, in response to any requests submitted by you to us:

- for a copy of personal data we are processing about you and/or to have inaccuracies corrected;
- to restrict, stop processing, or to delete your personal data;
- for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at: <https://ico.org.uk/concerns/>

To make a request in relation to any of the aforementioned rights, please send your requests to [hello@flowspace.co].

2. Children

We do not use the Website to knowingly solicit personal data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, he or she should contact us at [hello@flowspace.co]. We will delete such personal data within a reasonable time.

3. Security

We will take commercially reasonable, appropriate technical and organizational measures to ensure a level of security appropriate to the risk that could be encountered via the use of the Website and Services taking into account the likelihood and severity those risks might pose to the rights and freedoms of the Website visitors and customers.

In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

Please be aware that, while we make the security of the Website and your personal data a high priority and devote considerable time and resources to maintain robust IT security, no security system can prevent all security breaches. When you choose to share your personal data with us, you accept the aforesaid and provide your personal data at your own risk.

4. International Data Transfers

We are a company based in London, United Kingdom and our servers are located in the [insert] and your personal data will be stored in these servers.

There are agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the European Commission, such as the European Commission's standard contractual clauses.

If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by emailing us at [insert].

To find out more about the standard contractual clauses, please visit: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en

5. Retention Periods or Criteria

We will hold your personal data for as long as is necessary for the relevant purpose for which that personal data was obtained, or as otherwise described in this Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you would like us to stop using or holding your personal data and/or would like to request its deletion, please email us at [hello@flowspace.co].

6. Changes

This Policy may be updated from time to time. We will notify you of any changes by posting the new Policy on the Website, and, where feasible, by letting you know by email or on your account.

7. Contact Us

Questions, comments and requests in relation to this Policy are welcome and should be addressed to [hello@flowspace.co].