

Flownamix Group

Policies



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Policy Content

Privacy

Version I.0.2

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Introduction and Scope

The following companies form part of the Flownamix Group of companies and as such, this policy will be applied to each individual entity, as well as the group as a whole.

- SigniFlow (Pty) Ltd
- SigniFlow Ltd
- SigniFlow APAC
- SigniFlow Inc. SigniFlow Pte
- Datanamix (Pty) Ltd
- Brandnamix (Pty) Ltd
- SmsFlow (Pty) Ltd

This policy must be read, understood, and signed off on by all employees and contractors with access to personal information or privileged access to systems containing or processing personal information.

This policy covers handling personal information collected by Flownamix Group or its customers, including data that is stored, processed, or otherwise shared with Flownamix Group INC., its systems, employees, and contractors. It covers collecting, processing, storing, and deleting personal information. This policy also governs human resource data as it must be protected in a similar fashion as personal data of users and customers and all other personal information that may be collected, processed, or stored by Flownamix Group.

Legal Considerations

Flownamix Group is headquartered in South Africa. Most of its employees are located there, with some located in the United Kingdom and Australia.

Flownamix Group's customers are primarily located in South Africa with some in the United Kingdom, Asia Pacific, North America, South America, UAE and other regions not specifically mentioned but not excluded. This means that Flownamix Group has to consider a variety of regional, national, and international laws within the context of its privacy program. The Protection of Personal Information Act (POPIA) and the General Data Protection Regulations (GDPR) have been used as the baseline for the privacy program at Flownamix Group, adjusting the privacy policy program to the most stringent legal requirements to which personal data processing is subject.

Data Controller and Data Processor

Flownamix Group's business customers are the data controllers for most information entered into the Flownamix Group web application, website, and supporting systems or shared periodically with Flownamix Group employees to deliver services. This positions Flownamix Group as the data processor for most information stored and processed by Flownamix Group. Some pieces of information are collected directly by Flownamix Group to facilitate security, registration, logging, and application performance. These items include name, surname, email address and IP addresses and behavior within the Flownamix Group platform. For these pieces of information, Flownamix Group acts as the data controller, if applicable, and processor. Additionally, Flownamix Group employs a variety of technologies and partners that periodically act as sub-processors. If users have any questions or concerns about the processing and handling of their personal information, they may communicate directly with the Privacy Officer.

Privacy Notice and Transparency

It is important ethically and legally to provide reasonable transparency to data subjects concerning the processing and handling of their personal data. Flownamix Group maintains an up-to-date privacy notice that is made available to all customers and users of the Flownamix Group platform and services. Employees and contractors must read this privacy notice. If errors or concerns are discovered, findings must be shared with the Privacy Officer.

Privacy by Design

The concept of privacy by design must be applied to every new product, project, or service and if a change of substance to a current product, project, or service occurs. Privacy by design involves considering privacy at every project stage: planning, design, development, testing, launch, maintenance, and end of life.

In applying privacy by design, the following elements must be considered:

- Types of Data Collected
- The Purposes of Processing
- Legal Basis of Processing
- Data Residency and Cross-Border Transfer
- Retention Time
- Data Subject Rights

A privacy impact assessment and a threat risk assessment must be conducted as part of the planning and design phases of the project. They must be updated before launch to factor in changes in scope that occur throughout the product development. Additionally, these assessments must be reviewed at least annually or in the event of a significant change in scope, business use case, architecture, or legal landscape.

Legal Basis of Processing

SECTION A - GDPR

The General Data Protection Regulation

The General Data Protection Regulation 2016 (GDPR) is one of the most significant pieces of legislation affecting the way that FLOWNAMIX carries out its information processing activities.

Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of citizens of the European Union. It is FLOWNAMIX policy to ensure that our compliance with the GDPR and other relevant legislation is clear and demonstrable at all times.

Definitions

There are a total of 26 definitions listed within the GDPR and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

Personal data is defined as: any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination

or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller means: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Principles relating to processing of personal data:

There are several fundamental principles upon which the GDPR is based.

These dictate that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation').
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization').
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the

personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(l) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation').

6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

In addition, the controller shall be responsible for, and be able to demonstrate compliance with, paragraph l ('accountability').

FLOWNAMIX(Pty) Ltd must ensure that it complies with all these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems. The operation of an information security management system (ISMS) that conforms to the ISO/IEC 27001 international standard is a key part of that commitment.

Rights of the individual

The data subject also has rights under the GDPR. These consist of:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object

- Rights in relation to automated decision making and profiling.

Each of these rights must be supported by appropriate procedures within FLOWNAMIX that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown in the Table below:

DATA SUBJECT REQUEST	TIMESCALE
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

Consent

Unless it is necessary for a reason allowable in the GDPR, explicit consent must be obtained from a data subject to collect and process their data. In case of children below the age of 16 (Note – this age may be lower in individual EU member states) parental consent must be obtained. Transparent information about our usage of their personal data must be provided to data subjects at the time that consent is obtained and their rights regarding their data explained, such as the right to withdraw consent. This information must be provided in an accessible form, written in clear language and free of charge.

If the personal data is not obtained directly from the data subject, then this information must be provided within a reasonable period after the data is obtained and within one month.

Privacy by design

FLOWNAMIX has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect, or process personal data will be subject to due consideration of privacy issues, including the completion of one or more privacy impact assessments.

The privacy impact assessment will include:

- Consideration of how personal data will be processed and for what purposes.
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s).
- Assessment of the risks to individuals in processing the personal data.
- What controls are necessary to address the identified risks and demonstrate compliance with legislation.

Use of techniques such as data minimization and pseudonymization will be considered where applicable and appropriate.

Transfer of personal data

Transfers of personal data outside the European Union must be carefully reviewed prior to the transfer taking place to ensure that they fall within the limits imposed by the GDPR. This depends partly on the European Commission's judgement as to the adequacy of the safeguards for personal data applicable in the receiving country and this may change over time.

Intra-group international data transfers must be subject to legally binding agreements referred to as Binding Corporate Rules (BCR) which provide enforceable rights for data subjects.

Data protection officer

A defined role of Data Protection Officer (DPO) is required under the GDPR if an organization is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of data on a large scale. The DPO is required to have an appropriate level of knowledge and can either be an in-house resource or outsourced to an appropriate service provider.

Based on these criteria, FLOWNAMIX requires a Data Protection Officer to be appointed.

Breach notification

It is FLOWNAMIX policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours. This will be managed in accordance with our Information Security Incident Response Procedure which sets out the overall process of handling information security incidents.

Under the GDPR the relevant supervisory authority has the ability to impose a range of fines of up to four percent of annual worldwide turnover or twenty million Euros, whichever is the higher, for infringements of the regulations.

Addressing compliance to the GDPR:

The following actions are undertaken to ensure that FLOWNAMIX complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous.
- A Data Protection Officer is appointed with specific responsibility for data protection in the organization.
- All staff involved in handling personal data understand their responsibilities for following good data protection practice.
- Training in data protection has been provided to all staff.

- Rules regarding consent are followed.
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively.
- Regular reviews of procedures involving personal data are carried out.
- Privacy by design is adopted for all new or changed systems and processes.
- The following documentation of processing activities is recorded:
 - o Organization name and relevant details.
 - o Purposes of the personal data processing.
 - o Categories of individuals and personal data processed.
 - o Categories of personal data recipients.
 - o Agreements and mechanisms for transfers of personal data to non-EU countries. including details of controls in place
 - o Personal data retention schedules
 - o Relevant technical and organisational controls in place

These actions will be reviewed on a regular basis as part of the management review process of the information security management system.

FLOWNAMIX obligations as a cloud service provider

In addition to holding personal data on our own account, the relevant region cloud service provider also stores and processes the personal data of our cloud customers. In doing so, there are a number of additional obligations that must be fulfilled to allow our customers to stay within the law.

Our policy in this area is informed by ISO/IEC 27018 – Code of practice for protection of personally identifiable information (PII) in public clouds acting as

PII processors which, as well as recommending specific enhancements to ISO/IEC 27001 controls, also provides the following policy guidance:

- We must provide our customers with the facilities to meet their obligations under law in activities such as accessing, amending and erasing individuals' PII.
- We must only use the cloud customer's PII for their purposes, not our own.
- The customer must be informed if we are required by law to disclose any of their data, unless we are prohibited from doing so.
- Details of disclosures must be recorded.
- We must tell our customers if their PII is subject to unauthorized access.
- It must be clear in which country or countries the customer's PII is stored.
- It must be discussed with customers if third-parties are used to process PII

Additional recommendations stated in ISO/IEC 27018 are also included in the relevant policies and procedures within the ISMS.

SECTION B – THE PROTECTION OF PERSONAL INFORMATION ACT OF 2013 (POPIA)

As the Head Office for FLOWNAMIX is in South Africa, this is another significant piece of legislation affecting the way that FLOWNAMIX carries out its information processing activities.

Significant fines are applicable if a breach is deemed to have occurred under the POPIA, which is designed to protect the personal data of citizens of the Republic of South Africa. It is FLOWNAMIX policy to ensure that our compliance with the POPIA and other relevant legislation is always clear and demonstrable

Definitions

There are a total of 34 definitions listed within the POPIA, excluding the definitions contained in the body of the Act, and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

“personal information” means information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person, including, but not limited to—

- information relating to the race, gender, sex, pregnancy, marital status, national, ethnic or social origin, color, sexual orientation, age, physical or mental health, well-being, disability, religion, conscience, belief, culture, language and birth of the person;
- information relating to the education or the medical, financial, criminal or employment history of the person;
- any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier or other particular assignment to the person;
- the biometric information of the person;
- the personal opinions, views or preferences of the person;
- correspondence sent by the person that is implicitly or explicitly of a private or confidential nature or further correspondence that would reveal the contents of the original correspondence;
- the views or opinions of another individual about the person; and
- the name of the person if it appears with other personal information relating to the person or if the disclosure of the name itself would reveal information about the person.

“processing” means any operation or activity or any set of operations, whether or not by automatic means, concerning personal information, including—

- the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation or use;
- dissemination by means of transmission, distribution or making available in any other form; or
- merging, linking, as well as restriction, degradation, erasure or destruction of information.

“responsible party” means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing personal information;

Principles relating to processing of personal data:

There are several fundamental principles upon which the POPIA is based.

These dictate that the collection and processing of personal data shall be done taking the following into account:

1. “Accountability”, as referred to in section 8;

Section 8 Responsible party to ensure conditions for lawful processing

2. “Processing limitation”, as referred to in sections 9 to 12;

Section 9 Lawfulness of processing

Section 10 Minimality

Section 11 Consent, justification and objection

Section 12 Collection directly from data subject

3. “Purpose specification”, as referred to in sections 13 and 14;

Section 13 Collection for specific purpose

Section 14 Retention and restriction of records

4. “Further processing limitation”, as referred to in section 15;

Section 15 Further processing to be compatible with purpose of collection

5. "Information quality", as referred to in section 16

Section 16 Quality of information

6. Openness", as referred to in sections 17 and 18;

Section 17 DocumentationSection 18 Notification to data subject when collecting personal information

7. "Security safeguards", as referred to in sections 19 to 22; and

Section 19 Security measures on integrity and confidentiality of personal informationSection 20 Information processed by operator or person acting under authoritySection 21 Security measures regarding information processed by operatorSection 22 Notification of security compromises

8. "Data subject participation", as referred to in sections 23 to 25.

Section 23 Access to personal informationSection 24 Correction of personal informationSection 25 Manner of access

FLOWNAMIX must ensure that it complies with all these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems. The operation of an information security management system (ISMS) that conforms to the ISO/IEC 27001 international standard is a key part of that commitment.

Rights of the individual

The data subject also has direct and indirect rights under the POPIA. These consist of:

- The right to be informed

- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights to complain to the Information Regulator
- Rights in relation to direct marketing

Each of these rights must be supported by appropriate procedures within FLOWNAMIX that allow the required action to be taken.

These timescales are shown in the Table below and aligns with the Table provided for GDPR.

DATA SUBJECT REQUEST	TIMESCALE
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection

Consent

Unless it is necessary for a reason allowable in the POPIA, explicit consent must be obtained from a data subject to collect and process their data. In case of children below the age of 18 the data may not be collected unless the processing is:

- carried out with the prior consent of a competent person;
- necessary for the establishment, exercise or defence of a right or obligation in law;
- necessary to comply with an obligation of international public law;
- for historical, statistical or research purposes to the extent that—
 - the purpose serves a public interest and the processing is necessary for the purpose concerned; or
 - it appears to be impossible or would involve a disproportionate effort to ask for consent,
 - and sufficient guarantees are provided for to ensure that the processing does not adversely affect the individual privacy of the child to a disproportionate extent; or
- of personal information which has deliberately been made public by the child with the consent of a competent person

Transfer of personal data

Transfers of personal data outside the Republic of South Africa must be carefully reviewed prior to the transfer taking place to ensure that they fall within the limits imposed by the POPIA.

Information Officer

A defined role of Information Officer is required under the POPIA if an organization is:

- public body means an information officer or deputy information officer as contemplated in terms of section 1 or 17; or
- (b) private body means the head of a private body as contemplated in section 1, of the Promotion of Access to Information Act

Based on these criteria, FLOWNAMIX requires an Information Officer to be appointed.

Breach notification

It is FLOWNAMIX policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the POPIA, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours. This will be managed in accordance with our Information Security Incident Response Procedure which sets out the overall process of handling information security incidents.

Under the POPIA the relevant supervisory authority has the ability to impose a range of fines of between R1 million and R10 million or up to 10 years imprisonment, for infringements of the regulations.

Addressing compliance to the POPIA

The following actions are undertaken to ensure that FLOWNAMIX complies at all times with the accountability principle of the POPIA:

- The legal basis for processing personal data is clear and unambiguous
- An Information Officer is appointed with specific responsibility for data protection in the organization
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff

- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - o Organization name and relevant details
 - o Purposes of the personal data processing
 - o Categories of individuals and personal data processed
 - o Categories of personal data recipients
 - o Agreements and mechanisms for transfers of personal data other countries including details of controls in place
 - o Personal data retention schedules
 - o Relevant technical and organisational controls in place

These actions will be reviewed on a regular basis as part of the management review process of the information security management system.

Cookie Policy

The Flownamix Group website and Flownamix Group web application use cookies.

Users must be able to learn more about the use of cookies via a cookie notice that must be available to the user.

Privacy Notice

Version 0.0.2

- Created: August 31, 2023 02:34
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Privacy Notice

Please read the Flownamix Group Privacy Notice carefully to understand what information is collected through Flownamix Group, how this information is used, and when it may be disclosed.

It is important to note that due to legislative requirements, SigniFlow and Datanamix both have their own website Privacy Notices also. Such notices can be found on www.datanamix.com and www.signiflow.com.

In this Privacy Notice, "Flownamix Group " refers to our website, our application, and the products and services offered through our website and application. References to "we", "us" or "our" means Flownamix Group. References to "personal information" includes "personal health information".

By visiting our website and using Flownamix Group services, you provide your consent and agree to the collection of personal data in a lawful and fair manner. We ensure that the collection and processing of personal data adhere to applicable privacy laws and regulations. If you have any questions or concerns about the data we collect and how it is used, please contact Flownamix Group directly using the contact information provided in this privacy policy. Even if you do not read the entire Flownamix Group Privacy Notice.

Data Controller and Data Processor

Flownamix Group serves as the data processor for most information entered into the Flownamix Group application, website, and supporting systems, acting on behalf of its business customers who serve as the data controllers. However, Flownamix Group also collects certain information directly from users for security, logging, and application performance purposes, where it acts as the

data controller and processor. Flownamix Group may engage third-party sub-processors (as detailed below) to support its operations. If you have any inquiries about the processing of your personal data, please contact us using the contact information provided in this privacy notice.

Types of Data Collected

Flownamix Group strictly limits the collection of personal data to only the information that is necessary to perform and provide services or fulfill a direct business need. We adhere to the principle of data minimization, ensuring that only the minimum amount of personal data required is collected and processed.

When collecting personal data, we strive to be transparent about the purposes for which the data is being collected and how it will be used.

The Flownamix Group application and supporting applications collect the following types of personal data: cookies, usage data, email address, phone number, first name, last name, identification number/passport number, province, state, country, ZIP/Postal code, city, address, and company name.

Certain data may be mandatory for the use of the Flownamix Group application, while other data may be optional. When data is mandatory, it is clearly indicated throughout the website and application. Users are free to choose not to provide optional data without any impact on the availability or functionality of the service. If you have any questions about which personal data is mandatory, please contact us using the contact information provided in this privacy notice.

Flownamix Group applications may collect personal data that users provide voluntarily or collect usage data while using the website, web application, and supporting applications.

Furthermore, the Flownamix Group website and its supporting applications may use cookies and other tracking technologies to enhance the user experience and provide specific functionalities. Please refer to the Cookie Policy below for more information.

Safeguards

At Flownamix Group, we take the security of your personal data seriously. We implement robust technical and organizational measures to protect your data from unauthorized access, disclosure, alteration, or destruction.

We follow industry best practices and standards to ensure the confidentiality, integrity, and availability of your data. Our security measures include but are not limited to:

Encryption: We employ encryption techniques to safeguard your data during transmission and storage.

Access Control: We restrict access to personal data to authorized personnel only, ensuring that it is accessible on a need-to-know basis.

Regular Audits: We conduct regular security audits and assessments to identify and address any vulnerabilities or risks.

Employee Training: Our employees undergo comprehensive data protection training to ensure they understand the importance of data security and privacy.

We are committed to continuously enhancing our security practices and staying up to date with the latest industry standards to provide a secure environment for your personal data.

While we strive to protect your personal data, no method of transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security. If you have any concerns about the security of your data, please contact us using the contact information provided in this privacy notice.

Mode, Place, and Methods of Processing the Data

Personal data is processed using computers and technology-enabled tools in accordance with organizational policies and procedures related to the stated purposes. In certain cases, personal data may be accessible to Flownamix Group employees involved in the operation of the Flownamix Group website, application, and supporting applications. External parties, such as third-party technical service providers, hosting providers, and IT companies, may also have

access to personal data as data processors or sub-processors appointed by Flownamix Group.

Legal Basis of Processing

Flownamix Group may process personal data when one of the following legal bases applies:

- **Consent:** Processing is based on the user's consent for one or more specific purposes.
- **Performance of a Contract:** Processing is necessary for the performance of a contract between Flownamix Group and the user.
- **Legal Obligation:** Processing is necessary to comply with a legal obligation.
- **Legitimate Interests:** Processing is necessary for the legitimate interests pursued by Flownamix Group or a third party.

The specific legal basis for processing personal data will be provided upon request, including whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

Data is processed and hosted in the applicable Microsoft Azure hosting region.

Retention Time

Personal data is retained for as long as necessary to fulfill the purposes for which it was collected unless a longer retention period is required or permitted by law.

The retention periods are as follows:

Personal data collected for the performance of a contract between Flownamix Group and a business customer is retained until the contract is fully executed, or until the business customer requests deletion of the data.

Personal data collected for Flownamix Group's legitimate interests is retained as long as necessary to fulfill those purposes. For specific information about Flownamix Group's legitimate interests, please refer to the relevant sections of this document or contact us using the contact information provided in this privacy notice.

Personal data processed based on user consent may be retained until such consent is withdrawn, provided that it is not otherwise required or permitted by law.

Personal data may be retained for a longer period when necessary to comply with a legal obligation or a lawful order from an authority.

Once the retention period expires, personal data will be securely deleted or anonymized.

The Purposes of Processing

Flownamix Group collects and processes personal data for the following purposes:

- **Providing Services:** Personal data is collected to enable Flownamix Group to provide its services.
- **Analytics:** Personal data is used for monitoring and analyzing web traffic and user behavior on the Flownamix Group website and application.
- **User Database Management:** Personal data is managed to create user profiles, track user activities, and improve the application.
- **Managing Contacts and Sending Messages:** Personal data is used to manage contact lists and send communications to users.
- **Handling Payments:** Personal data is processed to facilitate payment transactions and related communications.

- **Displaying Content from External Platforms:** Personal data is used to display external content and enable interaction with it.
- **Hosting and Back-End Infrastructure:** Personal data is processed and stored on hosting and back-end infrastructure to support the operation of the Flownamix Group application.
- **Interaction with Live Chat Platforms:** Personal data is used to facilitate communication with users through live chat platforms.
- **Spam Protection:** Personal data is analyzed to filter spam traffic and protect against spam.
- **Contacting the User:** Personal data is processed to respond to user requests and inquiries.
- **Remarketing and Behavioral Targeting:** Personal data is used for remarketing and behavioral targeting purposes to display targeted advertisements.
- **Selling Goods and Services Online:** Personal data is processed for the provision of services or goods, including payment processing and delivery.

Processing and Sharing of Personal Data

Flownamix Group engages various services and third-party processors to support its operations. The following provides detailed information on the processing of personal data, the involved services, and the third-party processors:

- **Analytics:**
 - Zoho Analytics
 - Google Analytics (Google Inc.)
 - Twitter Ads Conversion Tracking (Twitter, Inc.)

- Google Ads Conversion Tracking (Google Inc.)
- Google Tag Manager (Google Inc.)
- LinkedIn Conversion Tracking
- Zoho Desk
- Zoho Social
- Contacting the User:
 - Lemlist
 - MailGun
 - MailJet
 - Zoho CRM
 - Web Forms Automation
- Displaying Content from External Platforms:
 - Google Fonts (Google Inc.)
 - YouTube Video Widget (Google Inc.)
 - Cloudflare
 - WpEngine
- Handling Payments:
 - PayPal (PayPal Inc.)
 - Xero (Xero Limited)
 - Ozow

- Peach Payments
- Paddle
- Paygate
- Hosting and Back-End Infrastructure:
 - Amazon Web Services (AWS) (Amazon)
 - Microsoft Azure
 - AliCloud
 - Huawei Data Center
- Remarketing and Behavioral Targeting:
 - Twitter Remarketing (Twitter, Inc.)
 - Twitter Tailored Audiences (Twitter, Inc.)
 - AdWords Remarketing (Google Inc.)
 - Remarketing with Google Analytics (Google Inc.)
 - Linked In Remarketing
- User Database Management:
 - LemList
 - Zoho CRM
 - Zoho Desk
- Selling Goods and Services Online:
 - Paddle

Cookie Policy

The Flownamix Group website and web application use cookies to enhance the user experience and provide specific functionalities.

The Rights of Users

Users have the following rights regarding their personal data processed by Flownamix Group:

1. **Right to Withdraw Consent:** Users have the right to withdraw their consent to the processing of their personal data at any time.
2. **Right to Object:** Users can object to the processing of their personal data based on legitimate interests or for direct marketing purposes.
3. **Right of Access:** Users can request access to their personal data and obtain information about the processing activities.
4. **Right to Rectification:** Users can request the correction or update of inaccurate or incomplete personal data.
5. **Right to Restrict Processing:** Users have the right to restrict the processing of their personal data under certain circumstances.
6. **Right to Erasure:** Users can request the erasure of their personal data, subject to legal obligations or overriding legitimate grounds.
7. **Right to Data Portability:** Users can request to receive their personal data in a structured, commonly used, and machine-readable format, and transmit it to another data controller.
8. **Right to Lodge a Complaint:** Users have the right to lodge a complaint with a data protection authority regarding the processing of their personal data.

To exercise these rights or obtain further information, users can contact Flownamix Group using the contact details provided in this document.

Changes to This Privacy Notice

Flownamix Group reserves the right to modify or update this privacy notice at any time. Changes will be communicated through the Flownamix Group website, application, or other appropriate means. It is recommended to regularly review this privacy notice for the latest information.

Contact Us

If you have any questions, concerns, or requests regarding this Privacy Notice, data deletion, accuracy, or any other privacy practices, please contact us at:

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