

# SYSTEMS FLOW

## Privacy Policy

Issue 1 | April 2026 | Jurisdiction: European Union (Estonia)

systems-flow.com

### 1. Who We Are

Systems Flow is an operational systems and automation infrastructure business registered in Estonia, European Union. We build conversion websites and connected automation systems for service businesses.

#### Legal name

Systems Flow

#### Address

Õismäe tee 44-32, 13512 Tallinn, Estonia

#### Website

systems-flow.com

#### General contact

kirill@systems-flow.com

#### Privacy & DSAR

legal@systems-flow.com

#### Phone / WhatsApp

+372 5840 5646

#### Supervisory authority

Andmekaitse Inspeksioon (AKI) — info@aki.ee — +372 627 4135

Depending on the context, Systems Flow acts in one of two roles:

- Data Controller — for personal data we collect and process in our own operations (website visitors, enquiries, and outreach prospects).
- Data Processor — for personal data we process on behalf of clients when delivering automation and website services.

### 2. What This Policy Covers

This Privacy Policy explains how Systems Flow collects, uses, stores, and protects personal data in connection with:

- Use of the systems-flow.com website
- Submission of enquiry or contact forms
- Participation in our website scorecard or quiz tools
- Booking appointments through our scheduling system
- B2B outreach we conduct to potential clients
- AI-powered chat tools deployed on our website (when active)
- Client project delivery, where we act as a data processor

This policy does not cover the data practices of third-party websites linked from our site. Where we act as a data processor for a client, the client's own privacy policy governs the end-user relationship.

### 3. Data We Collect and Why

#### 3.1 Website Enquiry and Contact Forms

When you submit an enquiry through our website contact form, we collect:

- Full name
- Email address
- Company name (optional)
- Message content

Lawful basis: Article 6(1)(b) GDPR — processing necessary to take steps at your request prior to entering a contract, or to perform a contract.

Retention: 12 months from last interaction for enquiries that do not convert to a client engagement. Active client records are retained for the duration of the contract plus 12 months.

### 3.2 Website Scorecard and Quiz

When you complete our business operations scorecard, we collect:

- First name and last name
- Email address
- Quiz answers and calculated score
- GDPR consent record

Lawful basis: Article 6(1)(a) GDPR — consent, recorded at the point of submission.

Retention: 12 months from submission for non-converting contacts.

### 3.3 Appointment Bookings

When you book a system review or consultation through our booking system (Cal.com), we collect:

- Name and email address
- Appointment date, time, and calendar entry
- Any information provided in booking form fields

Lawful basis: Article 6(1)(b) GDPR — contract performance.

Retention: Duration of the client relationship plus 12 months.

### 3.4 Website Analytics

We use Vercel Analytics to understand how visitors use our website. This tool collects:

- Pages visited and navigation paths
- Approximate geographic location (country/region level)
- Device type and browser information
- Referral source

Vercel Analytics is privacy-friendly and does not use cookies or fingerprinting for analytics purposes. No individual user profiles are created.

Lawful basis: Article 6(1)(f) GDPR — legitimate interest in understanding website performance to improve our services.

Retention: Aggregated analytics data — no individual-level retention.

### 3.5 B2B Outreach to Prospective Clients

Systems Flow conducts targeted B2B outreach to service businesses that may benefit from our services. This involves an automated research and outreach pipeline. We process the following data about business decision-makers:

- Business name, address, phone number, and website (sourced from Google Places API — publicly listed business data)
- First name, last name, job title, professional email address, and LinkedIn profile URL (sourced from Hunter.io — professionally published contact information)
- Email verification status and confidence score
- AI-generated analysis of the prospect's website (produced using Google Vertex AI / Gemini and Anthropic Claude API)
- Outreach email content, send status, reply status, and sequence tracking

Lawful basis: Article 6(1)(f) GDPR — legitimate interest. Systems Flow has conducted a Legitimate Interest Assessment (LIA) documenting that this processing is necessary for our commercial purpose, is limited to professional contact details, targets only business decision-makers in their professional capacity, and does not override the rights of data subjects. A copy of this LIA is available on request.

Your right to object: You have the right to object to this processing at any time. To opt out of all future outreach from Systems Flow, reply to any outreach email with the word 'unsubscribe', or contact us at [legal@systems-flow.com](mailto:legal@systems-flow.com). We will action all objections immediately and maintain a suppression list to prevent future contact.

Retention: Prospect data for contacts who do not respond is deleted 6 months after the last contact attempt. Data for contacts who respond and do not proceed is deleted 24 months after last interaction, or immediately on request.

### 3.6 AI Chat Widget (Planned)

We intend to deploy an AI-powered chat assistant on the systems-flow.com website. When active, this tool will collect and process:

- The content of messages you submit in the chat
- Your name and email address if provided during the conversation
- A description of your business problem or service needs

EU AI Act transparency notice: In accordance with Article 50 of EU Regulation 2024/1689 (the EU AI Act), you will be clearly informed when this chat assistant is active that you are interacting with an AI system, not a human. This notice will be displayed at the start of each conversation.

Lawful basis: Article 6(1)(a) GDPR — consent, obtained at the point of interaction.

This section will be updated when the chat widget is deployed.

### 3.7 Client Project Delivery (Processor Role)

When Systems Flow delivers automation and website services to clients, we may process personal data belonging to the client's customers on the client's behalf. In this context:

- The client is the Data Controller and determines the purpose and means of processing.
- Systems Flow is the Data Processor and processes data only on documented instructions from the client.
- The scope, categories of data, and retention periods are defined in the Data Processing Agreement (DPA) signed with each client.

Data processed in this context may include: names, email addresses, phone numbers, booking data, payment metadata, and CRM pipeline records, depending on the systems built for the client.

Systems Flow does not use client data for any purpose other than delivering the contracted service. All sub-processors used in client project delivery are listed in Schedule 1 of this policy.

## 4. International Data Transfers

Systems Flow is established in Estonia (EU). Some of our sub-processors are located outside the European Economic Area (EEA), including in the United States. Where personal data is transferred to countries not covered by an EU adequacy decision, we rely on Standard Contractual Clauses (SCCs) adopted by the European Commission as the transfer mechanism.

A full list of sub-processors and their applicable transfer mechanisms is set out in Schedule 1 of this policy. You may request a copy of the relevant SCCs or transfer documentation by contacting [legal@systems-flow.com](mailto:legal@systems-flow.com).

## 5. Your Rights Under GDPR

As a data subject, you have the following rights under EU GDPR (Regulation 2016/679):

### Right

What it means

Access (Art. 15)

Request a copy of the personal data we hold about you and information about how we process it.

Rectification (Art. 16)

Request correction of inaccurate or incomplete personal data.

Erasure (Art. 17)

Request deletion of your personal data where there is no legitimate reason for us to continue processing it.

Restriction (Art. 18)

Request that we limit the processing of your personal data in certain circumstances.

Portability (Art. 20)

Receive your personal data in a structured, commonly used, machine-readable format and transmit it to another controller, where technically feasible.

Object (Art. 21)

Object to processing based on legitimate interest, including direct marketing and outreach. We will cease processing immediately on receipt of a valid objection.

To exercise any of these rights, contact: [legal@systems-flow.com](mailto:legal@systems-flow.com)

We will respond within 30 days of receipt of a valid request. We may ask you to verify your identity before processing your request. If you are unsatisfied with our response, you have the right to lodge a complaint with the AKI:

- Andmekaitse Inspektsioon (AKI)

- info@aki.ee
- +372 627 4135
- aki.ee

## 6. Data Security

Systems Flow implements appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, or destruction. These measures include:

- Role-based access controls across all platforms
- Multi-factor authentication on all systems holding personal data
- Encryption in transit (HTTPS/TLS) for all data transfers
- Encryption at rest for database storage (Supabase)
- Regular review of access permissions and API key rotation
- Vendor DPA obligations requiring equivalent security standards

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the AKI within 72 hours of becoming aware of the breach, and will notify affected individuals without undue delay where required by GDPR Article 34.

## 7. Data Retention

Data category

Retention period

Basis for retention

Website enquiry — non-converting

12 months from last interaction

Legitimate interest

Outreach prospect — no response

6 months from last contact attempt

Legitimate interest — time-limited

Outreach prospect — responded or booked

24 months or duration of relationship

Contract / legitimate interest

Client project data

Duration of contract + 12 months

Contract performance

DSAR records

3 years from request date

Legal obligation / AKI limitation period

## 8. Cookies

Our website uses a limited number of cookies. Strictly necessary cookies (such as the CookieYes consent record) are placed without requiring consent. Optional analytics or functional cookies are only placed after you have given consent via our cookie banner.

For full details of cookies used on systems-flow.com, please refer to our Cookie Policy, available at [systems-flow.com/privacy](https://systems-flow.com/privacy).

## 9. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our processing activities, legal obligations, or sub-processor arrangements. Material changes will be noted on this page with an updated issue date. We recommend reviewing this policy periodically.

The current version is always available at [systems-flow.com/privacy](https://systems-flow.com/privacy).

## 10. Contact and Complaints

For any questions about this Privacy Policy, to exercise your data subject rights, or to submit a DSAR, contact us at:

Email (privacy)

[legal@systems-flow.com](mailto:legal@systems-flow.com)

Email (general)

[kirill@systems-flow.com](mailto:kirill@systems-flow.com)

## Address

Systems Flow, Õismäe tee 44-32, 13512 Tallinn, Estonia

## Phone / WhatsApp

+372 5840 5646

If you are unsatisfied with our response, you have the right to lodge a complaint with the Estonian Data Protection Inspectorate (AKI):

- Website: aki.ee
- Email: info@aki.ee
- Phone: +372 627 4135

## Schedule 1 — Sub-Processor Register

The following sub-processors are used by Systems Flow in the delivery of its services. All sub-processors are bound by data processing agreements requiring them to implement appropriate security measures and process personal data only on our instructions.

### Infrastructure & Database

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

Supabase Inc.

USA

CRM pipeline, lead records, client project databases

Names, emails, phone numbers, pipeline status, booking data

SCCs

Vercel Inc.

USA

Website hosting, deployment, analytics

Web traffic, IP addresses, form submissions in transit, analytics events

SCCs

### Automation & Orchestration

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

N8N GmbH

Germany (EU)

Full workflow orchestration — outreach, webhooks, lead routing

All prospect PII in transit across outreach workflows

EU-based — GDPR direct

### Outreach & Contact Discovery

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

Google LLC (Workspace — Sheets + Gmail)

USA

Outreach data store and email sending

Prospect name, email, company, job title, LinkedIn, outreach status, AI variables

SCCs (Workspace Terms)

Google Cloud / Vertex AI (Gemini)

USA

Prospect website analysis and personalisation variable generation

Prospect website content — stateless API calls

SCCs (Google Cloud DPA)

Hunter.io

France (EU)

Contact discovery and email verification

First name, last name, professional email, job title, LinkedIn, verification score

EU-based — GDPR direct

Anthropic PBC (Claude API)

USA

Outreach email copy generation

Prospect name, company, outreach variables — stateless API calls

SCCs

Scheduling

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

Cal.com Inc.

USA

Appointment booking infrastructure

Names, emails, booking times, calendar entries

SCCs

Consent Management

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

CookieYes

Estonia (EU)

Cookie consent banner and preference records

Consent records, timestamps, IP addresses

EU-based — GDPR direct

Internal Communication & Development

Sub-processor

Country

Purpose

Personal data

Transfer mechanism

Slack Technologies LLC

USA

Internal team communication

Internal messages only — no client or prospect data by policy

SCCs

Linear Orbit Inc.

USA

Project and issue tracking

Task descriptions only — no personal data by policy

SCCs

Functional Software Inc. (Sentry)

USA  
Application error monitoring  
Error logs, IP addresses  
SCCs  
GitHub Inc.  
USA  
Source code repository  
Code only — no personal data by policy  
SCCs

Payments (when activated)  
Sub-processor  
Country  
Purpose  
Personal data  
Transfer mechanism  
Stripe Inc.  
USA  
Payment processing  
Payment metadata only — Stripe is PCI-DSS controller for card data  
SCCs

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This document does not constitute legal advice. Review by a qualified legal professional is recommended.