

Privacy Policy

Last Updated: **November 19, 2025**

FlowOla Ltd (“FlowOla”, “we”, or “us”), a company registered in Hong Kong (CR 77737511), is committed to protecting your privacy. This Privacy Policy describes what personal data we collect, how we use and share it, and your rights regarding your personal data when you use our Site (flowola.it.com) and related services. We comply with Hong Kong’s Personal Data (Privacy) Ordinance (PDPO) and adhere to globally relevant privacy laws such as the EU General Data Protection Regulation (GDPR) in handling personal information. For example, if you are located in the European Economic Area (EEA), United Kingdom, or other regions with data protection laws, you will have certain additional rights as described in this Policy. We also address cookie usage and direct marketing practices in compliance with applicable laws (including GDPR and Hong Kong PDPO requirements for consent in direct marketing).

By using our Site or services, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with our practices, please do not use the Site. We may update this Privacy Policy from time to time (see “Changes to this Privacy Policy” below).

1. Personal Data We Collect

We limit our collection of personal data to what is relevant for providing our services and engaging with users for marketing or support. The categories of personal data we may collect include:

- **Information You Provide to Us:** When you interact with our Site or services, for example by filling out a contact form, subscribing to a newsletter, signing up for an account, or contacting us for support or consultation, you may provide personal information. This can include your name, email address, company/organization name, job title, phone number, and any other information you choose to provide in your message or inquiry. We only collect such information when you voluntarily submit it to us.
- **Account and Service Data:** If our services require user registration or account creation (for example, access to a FlowOla SaaS platform or client portal), we will collect information necessary to create and maintain your account. This may include login credentials (such as username and password), and any profile information you provide. We may also keep records of your service subscriptions, support tickets, or project details if you are a consulting client.
- **Usage Data and Log Information:** When you visit our Site, our servers automatically record certain information about your visit (commonly known as log data). This may include your IP address, browser type and version, device type, operating system, the pages or content you view, the dates and times of your visits, the referring page (if you came to our Site via a link from another site), and other standard web analytics information. We collect this to understand how our Site is used and to

improve user experience. This data may be collected by us or by third-party analytics tools (see “Cookies and Tracking Technologies” below).

- **Cookies and Tracking Technologies:** We use cookies and similar tracking technologies (like web beacons or pixels) on our Site to collect information about your interactions. Cookies are small text files placed on your device that help the Site function properly and provide analytical information. Through cookies, we may collect data such as your preferences (e.g., language settings), actions on the site (e.g., buttons clicked, pages visited), and other behavioral data. Our use of cookies is explained in detail in our separate Cookie Policy. In general, we classify cookies as:

- *Essential cookies* (necessary for technical operation of the Site),
- *Analytics cookies* (to analyze traffic and usage patterns), and possibly
- *Functional or preference cookies* (to remember your choices).

We do not use cookies for advertising or profiling purposes at this time (since we do not serve ads on our Site), but third-party analytics providers may set cookies as described later. You have choices about cookies – see our Cookie Policy and “Your Rights and Choices” below.

- **Third-Party Sources:** We do not typically obtain personal data about you from third-party sources without your consent. However, if you interact with our social media pages or third-party platforms in connection with our services, we might receive basic account information from those platforms (according to your privacy settings on those services). For example, if you use a “Login with Google” or “LinkedIn” feature (if available), we would receive the information those services share with us (which you will be informed of during that login process). Additionally, if you are a corporate client, we might receive contact information for individuals at your organization from your own referral or from publicly available business contact sources, but only for legitimate business purposes (like reaching out about a mutual business interest).

Note: We do not collect any payment information via the Site (since we have no online payment system on flowola.it.com). We also do not intentionally collect any sensitive personal data (such as personal ID numbers, financial account numbers, health information, or biometric data) through our Site. Please refrain from sending sensitive personal information to us via the Site. If such data is necessary for a specific service engagement (e.g., as part of a project), we will handle it with appropriate care and separate agreements as required.

We do not knowingly collect personal data from children under the age of 16 (and our Site and services are not directed to children). If you are under 16 (or a minor under the laws of your jurisdiction), please do not provide any personal information to us. If we learn that we have inadvertently collected personal data from a child under 16 without proper consent,

we will take steps to delete that information. Parents or guardians who believe their child may have provided us information can contact us to request deletion (see Contact Information below).

2. How We Use Personal Data

We use the personal data we collect for the following purposes, and we ensure that there is a valid legal basis for each use:

- **Providing and Improving Services:** We use information to operate, maintain, and improve our Site and SaaS platform. For example, your contact and account information is used to create an account (if applicable), allow you to log in, and utilize our services. Usage data and analytics help us troubleshoot performance issues, understand user needs, and enhance the functionality and user experience of our Site and offerings. (Legal basis: *Legitimate interests* in running and improving our services, and *performance of a contract* when we provide you services that you requested.)
- **Communicating with You:** We use contact information (like your email or phone number) to respond to your inquiries, support requests, or project discussions. If you fill out a “Contact Us” form or email us, we will use your provided information to respond to your message. We may also send you administrative emails (e.g., service updates, security or privacy policy changes, information about your account or transactions) when needed. These communications are considered part of our services. (Legal basis: *Legitimate interests* in replying to communications or *performance of contract* if related to a service you use.)
- **Marketing and Newsletters:** With your consent or as otherwise permitted by law, we may use your email address and name to send you newsletters, marketing emails or to inform you about new services, events, or updates from FlowOla that may be of interest. We will only send you marketing communications if you have opted-in to receive them (for example, if you subscribed to our newsletter or explicitly requested marketing updates). You have the right to withdraw your consent at any time and opt out of marketing emails – every marketing email from us will contain an “unsubscribe” link for your convenience. We also comply with Hong Kong’s PDPO requirements for direct marketing, which means we will not use your personal data for direct marketing without your consent and proper notification. If you opt out of marketing, we will cease such communications. (Legal basis: *Consent* for optional marketing communications; or *legitimate interests* in promoting our business to existing customers, in compliance with direct marketing laws.)
- **Analytics and Personalization:** We use data (primarily via cookies and similar technologies) to analyze how users use our Site, which pages or features are most popular, and how users navigate through the Site. This helps us understand traffic patterns and user behavior on an aggregate level so we can improve content and design. We may also use cookies to remember your preferences (like language or

region selection) to personalize your experience. All analytical data is typically processed in a de-identified or aggregated form. (Legal basis: *Legitimate interests* in understanding and improving user experience. In jurisdictions where consent is required for analytics cookies, we will obtain your consent via the cookie banner – see Cookie Policy.)

- **Service Delivery and Client Engagement:** If you are a client of our consulting or development services, we will use your information to deliver the contracted services. This can include using your project data, communicating about project progress, and handling any data you share with us as part of the service. Any such use will be governed by our contract with you and, if applicable, separate data processing agreements. (Legal basis: *Performance of a contract* – fulfilling our obligations to you as a client.)
- **Legal Compliance and Protection:** We may process personal data as required to comply with applicable laws, regulations, legal processes, or governmental requests. For example, keeping records required by Hong Kong company law or fulfilling lawful requests from authorities. Additionally, we may process data to establish or exercise our legal rights or defend against legal claims, to investigate/prevent fraud, security issues, or other harmful activity, or to enforce our Terms of Use and other agreements. (Legal basis: *Legal obligation* and/or *legitimate interests* in protecting our rights and the security of our services.)
- **Business Transfers:** In the event of a potential or actual merger, acquisition, financing, sale of assets, or similar corporate transaction involving FlowOla, personal data may be transferred to a successor or affiliate as part of that process. If such a transfer occurs, we will ensure the receiving party agrees to respect your personal data in a manner consistent with this Privacy Policy. (Legal basis: *Legitimate interests* in business continuity; we will provide notice to users if required by law in such cases.)

We will not use personal data for purposes that are incompatible with the above, unless we obtain your consent or are required/permitted by law to do so. We do not engage in automated decision-making or profiling that produces legal or similarly significant effects on individuals, using the data collected on our Site.

3. Cookies and Tracking Technologies

As noted, our Site uses cookies and similar tracking technologies to enhance user experience and gather analytics. For detailed information, please refer to our Cookie Policy (below), which is hereby incorporated into this Privacy Policy. In summary:

- **Types of Cookies:** We use essential cookies that are necessary for the Site's core functionality (e.g., session cookies to remember your login or preferences), which do not require consent. We also use analytics cookies (from third parties like Google Analytics) to collect information on how visitors use our Site (e.g., which pages are

visited, how long spent on site, etc.). These analytics cookies are usually set only with your consent, depending on your location (for example, GDPR requires opt-in consent for non-essential cookies). We currently do not use advertising cookies on our Site.

- **Cookie Consent:** When you first visit our Site, you will see a cookie consent banner that informs you about our use of cookies and asks for your consent for non-essential cookies (such as analytics cookies). You have the option to accept all cookies, reject non-essential cookies, or customize your preferences. Your choice will be remembered by a functional cookie that stores your consent state. If you opt out of certain cookies, those will not be activated on your browser; note that some features of the Site (especially those relying on those cookies) might be limited if you decline cookies.
- **Managing Cookies:** Even after consenting, you can always change your cookie settings. Most web browsers allow you to refuse or delete cookies through their settings. You can typically remove stored cookies and set your browser to block cookies (consult your browser's help documentation for instructions). However, please be aware that if you disable all cookies, our Site might not function correctly or your user experience may degrade (for example, you may have to re-enter your preferences each time or certain interactive features might not work). For more on this, see the Cookie Policy section on managing cookies.
- **Do Not Track:** Our Site does not currently respond to "Do Not Track" signals from web browsers. However, you can manage cookie preferences as described, which is the primary means of controlling tracking on our Site.

4. How We Share Personal Data

FlowOla does not sell your personal data to third parties. We only share personal data in limited situations, as described below, and always with appropriate safeguards:

- **Service Providers:** We may share personal data with third-party service providers and partners who perform services on our behalf to support our Site and operations. Examples include:
 - **Analytics providers:** e.g., Google Analytics (to process usage data for insights – Google may process data as described in their privacy policy; we have configured our analytics to anonymize IP addresses where applicable).
 - **Email and Marketing platforms:** e.g., a platform for sending newsletters or transactional emails (if you signed up for updates, your email and name would be stored in such a service in order to send you emails).
 - **Hosting and Infrastructure:** e.g., web hosting companies or cloud providers that host our website or SaaS application and databases.

- Customer Support tools: if we use any CRM or helpdesk software to manage inquiries or client information.

These providers are only given access to the personal data necessary for them to perform their functions, and they are contractually obligated to protect it and use it only for our purposes and in compliance with privacy laws (for example, we sign Data Processing Agreements with providers as needed under GDPR).

- Business Partners and Affiliates: We may share data with affiliated companies (for instance, if FlowOla Ltd has subsidiaries or sister companies involved in delivering the services) or with joint venture partners, but only as needed for the purposes stated (for example, if another company co-develops a product with us or helps in service delivery, they might have access to your contact/project info under similar privacy obligations). We currently do not have any such parent or subsidiary companies outside FlowOla that would receive your data, but if that changes, we will update this policy.
- Legal Requirements: We may disclose personal data if required to do so by law or in response to valid requests by public authorities (e.g., law enforcement, courts, or regulators). For example, if a law, regulation, search warrant, subpoena, court order, or legal process legally compels us to disclose certain data, we will comply after verifying the request's validity. Where permissible, we will attempt to notify you of such requests.
- Protection of Rights and Safety: We may share information when we believe it is necessary to enforce our Terms of Use, protect the rights, property, or safety of FlowOla, our users, clients, or the public. This includes exchanging information with other companies or organizations for fraud prevention, spam/malware detection, or other security issues.
- Business Transfers: As noted earlier, if FlowOla is involved in a merger, acquisition, restructuring, or sale of assets, personal data may be transferred to the acquiring entity or merged with another business. We will ensure the confidentiality of personal data during such processes and provide notice before personal data is transferred or becomes subject to a different privacy policy.
- Consent: In situations where you have given us consent to share your information with a third party (for example, if you consent to our sharing your details with a partner for a joint webinar or to receive that partner's communications), we will share accordingly. You can revoke such consent at any time.

Importantly, any third parties with whom we share personal data must process it in accordance with applicable data protection laws and, where required, under contractual obligations (such as GDPR-compliant data processing agreements). We do not allow our third-party processors to use your data for their own marketing or other purposes outside the scope of our engagement.

5. International Data Transfers

FlowOla is based in Hong Kong, and our website is operated from Hong Kong (with possible use of cloud servers that could be located in other countries). This means that if you are located outside of Hong Kong (for example, in the European Union, United Kingdom, or United States), your personal data will likely be transferred to and processed in Hong Kong or other jurisdictions outside of your home country. Hong Kong: While Hong Kong's data protection law (PDPO) provides protections for personal data, it may not be deemed "adequate" under EU data protection standards (the EU has not currently issued an adequacy decision for Hong Kong). As a result, when we transfer personal data from the EEA/UK or other regions with transfer restrictions, we take steps to ensure appropriate safeguards are in place.

- By using our Site or providing us with your information, you acknowledge the transfer of your personal data to Hong Kong and other jurisdictions as necessary. We will handle your information securely and lawfully regardless of where it is processed, but we want you to be aware that the privacy laws of those jurisdictions might differ from those in your country.
- Safeguards for EU/UK Personal Data: For personal data subject to GDPR (EU or UK), we implement at least one of the following transfer mechanisms: (a) Standard Contractual Clauses (SCCs) – we may incorporate the European Commission-approved SCCs into our contracts with service providers or affiliates to ensure that they protect EU personal data when transferring it to Hong Kong or other third countries; (b) Your Consent – in some cases, we may rely on your explicit consent for the transfer (for instance, if you submit information knowing it will be handled in Hong Kong, that can be considered consent, though we prefer contractual safeguards); or (c) other valid transfer mechanisms under GDPR if applicable. If you would like more information on our transfer safeguards, you can contact us using the details below.
- Other Regions: For transfers from other countries with data transfer restrictions, we similarly ensure compliance with those requirements (for example, using contracts or obtaining consent where required by the local law).

Despite the safeguards we implement, when your data is in a jurisdiction like Hong Kong or others, it may be accessible to courts, law enforcement, and national security authorities under local laws. However, our policy is to only disclose data to such authorities if legally compelled and to challenge overbroad requests when possible. Your privacy is important to us, and we evaluate any government data requests carefully (as noted in the previous section on sharing under legal requirements).

6. Data Security

We take reasonable and appropriate measures to protect personal data from loss, misuse, unauthorized access or disclosure, alteration, and destruction. These measures include:

- **Technical Measures:** We use industry-standard encryption (e.g., TLS/SSL) to secure data in transit on our Site (you'll notice our site URL begins with https:// indicating encryption). Our servers are protected by firewalls and monitoring. We regularly update our software and infrastructure to address security vulnerabilities. Where applicable, passwords are stored using hashing and not in plain text.
- **Administrative Measures:** We restrict access to personal data to FlowOla employees, contractors, and agents who need to know that information in order to process it for us, and who are subject to confidentiality obligations. We provide training to our staff about data protection and security best practices. We also maintain policies and procedures to handle any suspected data breach.
- **Physical Security:** If any personal data is stored in physical form, access to those facilities or files is controlled. However, as a tech company, most data we hold is in digital form in secure data centers.

While we strive to protect your personal data, please be aware that no method of transmission over the Internet or electronic storage is completely secure. Therefore, we cannot guarantee absolute security. You should also take precautions – for example, if we provide you with (or you create) a password to access certain parts of our service, keep it confidential and do not share it. If you suspect any unauthorized access or have any security concerns, please contact us immediately.

In the unlikely event of a data breach involving your personal data, we will notify you and the relevant authorities as required by law. For instance, under Hong Kong PDPO we may notify the Privacy Commissioner in serious cases, and under GDPR we would notify the appropriate supervisory authority and affected individuals when required.

7. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, as described in this Policy, or as required by law or legitimate business purposes. In practice, this means:

- **Contact and inquiry data** (e.g., if you contacted us but did not become a customer) is retained as long as needed to respond to you, plus a reasonable period (for instance, we may keep inquiry emails for a year or two for reference and to improve our service). If you ask us to delete your information, we will do so (see Your Rights below), provided we have no ongoing legitimate reason to keep it.
- **Account data** for registered users or clients is kept for the duration of the customer relationship and a period after its termination. For example, if you have an account on a FlowOla platform, we will retain your account information while your account is active. If you choose to close your account or it becomes inactive, we will retain the data for a certain period in case you return or for record-keeping, unless you request deletion sooner. Backup copies might persist for a short time beyond deletion, but will be purged in the normal backup cycle.

- Marketing data (such as your email for newsletters) is kept until you unsubscribe or withdraw consent. Upon opt-out, we will remove you from the mailing list promptly and only keep enough information (like your email in a suppression list) to ensure we respect your opt-out going forward.
- Analytics data is often aggregated or anonymized. We may keep aggregated analytics indefinitely (since it no longer identifies individuals). Raw analytics logs at the individual level are typically retained for a shorter period (e.g., 14 months by Google Analytics by default, or a duration we configure that meets our analysis needs and legal guidelines).
- Legal and transactional records (like contracts, invoices if any, communications regarding services, etc.) are retained as long as necessary for contract enforcement, dispute resolution, and to comply with legal obligations (e.g., accounting records might be kept for X years as required by law).

Once the retention period expires or the purpose is fulfilled, we will securely dispose of or anonymize the personal data. When determining retention periods, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorized use or disclosure, the purposes of processing, and whether those purposes can be achieved through other means, as well as applicable legal requirements.

8. Your Rights and Choices

Depending on your jurisdiction, you may have certain legal rights regarding your personal data. FlowOla is committed to honoring these rights. This section outlines the rights of individuals under the GDPR (for EU/EEA and UK users) and similar laws, as well as how any user can manage their data with us:

- **Right to Access:** You have the right to request confirmation of whether we are processing your personal data, and if so, to request a copy of the personal data we hold about you. We will provide you with a copy of the data in a common format, subject to some exceptions (for example, we may not provide information that includes personal data of another person unless that person consents or it's otherwise permitted).
- **Right to Rectification:** If any of your personal data that we have is inaccurate or incomplete, you have the right to request that we correct or update it. For instance, if you change your email or notice an error in your contact info we have on file, let us know and we will correct it.
- **Right to Erasure (Deletion):** You have the right to request that we delete your personal data, sometimes called the "right to be forgotten". You may exercise this right, for example, if the data is no longer necessary for the purposes it was collected, if you withdraw consent (where consent was the basis for processing), or if you object to our processing (see below) and we have no overriding legitimate grounds to continue. Please note this right is not absolute – sometimes we may

have legal obligations or legitimate reasons to retain data (for example, we cannot delete data that is required for us to comply with laws or defend legal claims). We will inform you if any such exceptions apply when responding to your request.

- **Right to Restrict Processing:** You have the right to request that we limit the processing of your personal data under certain circumstances. For instance, if you contest the accuracy of the data, you can request we restrict processing while we verify the accuracy; or if you object to processing (see below) we may restrict it while considering your request. When processing is restricted, we will still store your data but not use it except for certain things like legal claims or protecting others' rights, until the restriction is lifted.
- **Right to Object:** You have the right to object to our processing of your personal data where the legal basis is our legitimate interests (or those of a third party). If you object, we must stop processing unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms or unless it's needed for legal claims. Importantly, you have an unconditional right to object to the processing of your personal data for direct marketing purposes. If you object to or opt out of marketing, we will honor that (as noted above in the Marketing section, you can unsubscribe any time).
- **Right to Data Portability:** Where we process your personal data by automated means and the basis is consent or contract, you have the right to request a copy of your data in a structured, commonly used, machine-readable format, and you can ask us to transmit it to another controller where technically feasible. In simpler terms, for certain data you provided to us, you can ask for it in a format (like CSV or JSON) that you could then import into another service. This typically applies to account data or data you actively provided.
- **Right to Withdraw Consent:** If we rely on your consent for any processing (e.g., sending marketing emails, or placing certain cookies), you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing that was done before withdrawal. For example, you can unsubscribe from newsletters (withdrawing consent for marketing), or update your cookie preferences via our cookie banner settings to withdraw consent for analytics cookies.
- **Right not to be Subject to Automated Decisions:** We do not currently carry out any fully automated decision-making (without human involvement) that has legal or similarly significant effects on individuals. If that changes, and if it were to occur, you would generally have the right to not be subject to such decisions without your input, and/or to request human intervention.

To exercise any of these rights, please contact us at info.flowola@gmail.com (or see Contact Information below). We may need to verify your identity before fulfilling certain requests (to ensure we don't disclose data to the wrong person). We will respond to your

request within a reasonable timeframe, and in any event within the timeframe required by law (GDPR requires within 1 month, extendable by 2 months if necessary with notice). There is usually no fee for exercising your rights, but if requests are manifestly unfounded or excessive, we may charge a reasonable fee or refuse to act (we will explain why if that's the case).

Hong Kong PDPO Rights: If you are in Hong Kong or your data is subject to PDPO, note that under PDPO you specifically have the right to request access to and correction of personal data held by us. We are happy to assist with those rights, which align closely with the access and rectification rights described above. Hong Kong law allows us to charge a reasonable fee for handling a data access request; however, as of now, we do not intend to charge any such fee for straightforward requests.

California/CCPA: While our primary audience is not the U.S., if you are a California resident, you may have similar rights under the California Consumer Privacy Act (CCPA) or other U.S. state laws (effective 2023-2025). Should those apply, this Privacy Policy already provides transparency about personal information usage. You can contact us for any specific inquiries regarding CCPA rights (like knowing what categories of info we collect, etc.) and we will address them in accordance with the law. We do not sell personal information as defined by CCPA.

Finally, if you have an issue with how we handle your data, we kindly request the chance to address it by contacting us. However, you also have the right to lodge a complaint with a supervisory authority. For example, if you are in the EU, you can complain to the data protection authority in your country. In Hong Kong, you can contact the Office of the Privacy Commissioner for Personal Data (PCPD). We would appreciate the opportunity to discuss and resolve your concern before you approach a regulator, so please consider reaching out to us first.

9. External Links and Services

Our Site may contain links to external websites or integrate third-party services (such as a social media widget or an embedded video hosted by a third-party). This Privacy Policy applies only to data collected by FlowOla on our own Site and services. If you follow links to any external websites or use third-party services, those are governed by their own privacy policies, which we do not control.

For example, if we link to a blog article on another site or our page includes a button that takes you to a third-party payment processor (in case of future integration) or a scheduling service, any information you provide to those external services is not covered by our Privacy Policy. We encourage you to review the privacy notices of any site or service you visit.

We may also maintain presences on social media platforms like LinkedIn, Twitter, or Facebook. If you visit those pages, those platforms' privacy terms apply. However, any personal data that we collect from you directly via those channels (e.g., if you send us a direct message or comment) will be treated in accordance with this Privacy Policy.

10. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our data practices or legal requirements. When we make changes, we will post the updated policy on this page and update the “Last Updated” date at the top. If the changes are significant, we may also provide a more prominent notice (such as on our homepage or via email notification, if we have your email on file for this purpose).

We encourage you to review this Privacy Policy periodically for any updates. Your continued use of our Site or services after any changes to this Policy constitutes your acceptance of the updated terms. If you do not agree with the changes, you should stop using the Site and can request us to remove your personal data as per your rights.

11. Contact Information (Privacy)

If you have any questions, concerns, or requests regarding this Privacy Policy or the handling of your personal data, please contact us:

FlowOla Ltd – Privacy Office

Email: info.flowola@gmail.com

Address: 21/F, Kam Fung Commercial Building, 2-4 Tin Lok Lane, Wan Chai, Hong Kong

FlowOla Ltd is the data controller responsible for the processing of your personal data as described in this Policy. For EEA/UK users, you may also reach out to our EU representative at [to be provided if applicable] (Note: As a Hong Kong company, we will appoint an EU representative if required under GDPR Article 27; currently, our processing of EU data is limited and may be considered occasional, but we will update this if our status changes).

We will do our best to address any inquiry or complaint. Your privacy is important to us, and we are committed to resolving any issues in a fair and transparent manner.