DOCUMENT

Privacy Policy

Version 1 · 15 November 2026

This policy explains how Infumia LTD processes personal data on our website, customer portal, software products and project services, who we share it with and how you can exercise your rights.

ISSUED BY

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Infumia LTD

COMPANY NO
15791340 (England and Wales)

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DOCUMENT

VERSİON
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EFFECTİVE DATE
15 November 2026

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https://infumia.com/privacy-policy

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SECTİON 1

Scope and controller

This policy covers infumia.com and its subdomains, the customer portal, Datacorp, FlowRota and our other software products, our mobile apps and our quote, contract, support and billing processes.

The controller is **Infumia LTD** (registered in England and Wales, company no. 15791340), registered office: 71–75 Shelton St, London WC2H 9JQ, United Kingdom. Our Türkiye office and correspondence address is Orhanbey, Atatürk Cd. Koruyucu İşhanı, 16010 Osmangazi/Bursa. Our single contact address for all privacy matters is **info@infumia.com**.

The policy is written for the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), Turkish Law No. 6698 on the Protection of Personal Data (KVKK) and, where applicable, the EU GDPR.

SECTİON 2

Our roles

- **As controller:** data we process when you visit our website, contact us, receive a quote, open an account, buy a product and when we invoice you.
- **As processor:** data about your own customers, staff or members held in software we build or provide for you (for example Datacorp or a custom panel). You are the controller of that data and our Data Processing Agreement applies.

SECTİON 2

Our roles (devam)

Cartoonizer processes photos on your device and does not send them to our servers. FlowRota keeps your automations, data pools and third-party API keys on your own computer; our servers only hold account and licence data and monthly run counts.

SECTİON 3

Data we collect

- **Identity and contact:** name, job title, company, e-mail, phone, address.
- **Account:** username, a one-way hash of your password, sign-in and verification records, language preference.
- **Customer transactions:** quote requests, project content and files, support tickets, correspondence, approval records.
- **Financial:** billing details, tax number, payment status, bank transfer receipts. We never see or store your card number.
- **Legal acceptance records:** the version of each document you accepted, date and time, IP address, browser details and a SHA-256 digest of the text.
- **Security:** IP address, browser and device details, security and error logs.
- **Analytics and marketing:** visit statistics and ad measurement data collected by cookies, only if you consent.

SECTİON 4

Purposes and lawful bases

Preparing quotes, entering into and performing contracts	**Contract (Art. 6(1)(b))**
Account management, authentication, support	**Contract, legitimate interests**
Invoicing, accounting and tax records	**Legal obligation (Art. 6(1)(c))**
Keeping records of pre-contract information and acceptance	**Legal obligation, legitimate interests**
Information security and fraud prevention	**Legitimate interests (Art. 6(1)(f))**
Analytics and ad measurement cookies	**Consent (Art. 6(1)(a)) and PECR**
Marketing e-mails	**Consent or the soft opt-in for existing customers (PECR)**

SECTİON 4

Purposes and lawful bases (devam)

You can withdraw consent at any time; this does not affect processing carried out before withdrawal.

SECTİON 5

Payments

Card payments are taken on the secure pages of payment providers (Stripe; iyzico and PayTR where enabled). Your card details go directly to them; we only receive the result, amount and transaction reference.

SECTİON 6

AI features

Some products may use AI provider APIs (for example OpenAI, Anthropic or Google). Only the text or image needed for the action you start is sent. We do not use your data to train AI models. We do not make solely automated decisions with legal or similarly significant effects.

SECTİON 7

Who we share data with

We never sell or rent personal data. We share it only with the providers below, to the extent needed:

PROVİDER	SERVİCE	LOCATİON
PenDC	Primary data centre (servers and line owned by Infumia)	Bursa, Türkiye
Hetzner Online GmbH	Additional hosting and backups	Germany, Finland
OVHcloud	Additional hosting and backups	France
Cloudflare	DNS, network security, form bot check (Turnstile)	Global
Google	E-mail and office tools; Google Analytics and Google Ads with consent	US, EU
Microsoft	Clarity visit statistics with consent	US, EU
Meta	Ad measurement with consent; WhatsApp messaging	US, EU
Stripe Payments	Card payments	Ireland, US
Wise, Revolut	Bank accounts and transfers	UK, EU
AI providers	AI actions you start	US

SECTİON 7

Who we share data with (devam)

We may also disclose data to authorities and courts where required by law, and to our accountants, lawyers and auditors under confidentiality.

SECTİON 8

International transfers

Our servers are in Türkiye (Bursa) and the European Union. Türkiye does not have UK adequacy status, so transfers from the UK rely on Article 46 UK GDPR safeguards (the International Data Transfer Agreement or the EU Standard Contractual Clauses with the UK Addendum). Transfers out of Türkiye follow Article 9 KVKK, using the standard contracts published by the Turkish Data Protection Authority. Data is encrypted in transit and access is limited to authorised staff.

SECTİON 9

Retention

Account data	**While the account is open, then 30 days**
Quote requests and correspondence	**2 years after the last interaction**
Contracts, invoices, payment and accounting records	**Statutory periods (at least 6 years in the UK, 10 years in Türkiye)**
Pre-contract information and acceptance records	**At least 3 years, kept with the contract records**
Security and server logs	**90 days to 2 years**
Backups	**30 days**

SECTİON 10

Security

We use reasonable technical and organisational measures: TLS encryption in transit, one-way password hashing, two-step verification for admin accounts, role-based access, regular backups, a firewall and access logging. Please report any security concern to info@infumia.com.

SECTİON 11

Your rights

You have the right to access, rectify and erase your data, to restrict or object to processing, to data portability, to withdraw consent and not to be subject to solely automated decisions. Send requests to info@infumia.com. We reply within one month, free of charge, and may ask you to verify your identity.

SECTİON 12

Cookies and marketing

Essential cookies are always on; statistics and marketing cookies load only with your consent. You can change your choice at any time via "Cookie Settings" at the bottom of every page. See our Cookie Policy. We send marketing e-mails only with your consent or, for existing customers, under the PECR soft opt-in, and every message has an unsubscribe link.

SECTİON 13

Children

Our services are for businesses and people aged 18 or over.

SECTİON 14

Changes and complaints

We publish updates on this page with a new version number and effective date and notify account holders of material changes. If you are unhappy with our reply you can complain to the Information Commissioner's Office, to the Turkish Personal Data Protection Authority or to the authority in your EU country of residence.

SECTİON 15

Contact

Infumia LTD, registered in England and Wales, company no. 15791340 Registered office: 71–75 Shelton St, London WC2H 9JQ, United Kingdom Türkiye office: Orhanbey, Atatürk Cd. Koruyucu İşhanı, 16010 Osmangazi/Bursa E-mail: info@infumia.com, Phone: +90 552 251 02 66

We have not appointed a Data Protection Officer; please write to info@infumia.com for any request.