Privacy Policy

Effective Date: 16 September 2025

1. Introduction

Welcome to Flow Payroll. We are Flow Payroll Limited ("we", "us", "our"), and we are committed to protecting the privacy and security of the personal data we process. This Privacy Policy explains how we collect, use, share, and protect personal data. It applies to:
Visitors to our website, `flowpayroll.ai` (our "Site").
Our business contacts at prospective and current clients.
Authorised users of the Flow Payroll platform (our "Services").
The employees of our clients whose payroll data we process (we call them "Payees").
This policy is designed to be clear and transparent, helping you understand your rights under the UK General Data Protection Regulation (UK GDPR).

2. The Roles Explained: Data Controller vs. Data Processor

It is crucial to understand the different roles we play, as this affects how your data is handled and who is responsible for it. This is consistent with our **Data Processing Agreement (DPA)** with our clients.
When we are the Data Processor (Processing Payroll Data): When we process the personal data of our clients' employees ("Payees") to provide our payroll Services, **your employer is the Data Controller**, and **Flow Payroll is the Data Processor**. This means we only process your data on the documented instructions of your employer. Your employer is responsible for the legal basis of this processing and for handling your data rights requests.
When we are the Data Controller (Our Own Business Data): When we collect personal data for our own business purposes—such as from visitors to our Site or our business contacts at client companies—**Flow Payroll is the Data Controller**. We are responsible for this data and how it is used.

3. What Personal Data We Collect and Why

We collect different types of data depending on your relationship with us. We will only collect data for which we have a valid legal reason (a "lawful basis").

If you are a Visitor to our Site:

- **Technical Data:** Including your IP address, browser type and version, device information, and browsing activity.
  - **Purpose and Lawful Basis:** To operate, secure, and improve our Site and analyse its performance (**Legitimate Interests**).
- **Cookie Data:** Information collected via cookies and similar technologies.
  - **Purpose and Lawful Basis:** To provide functionality and analyse usage. Please see our separate Cookie Policy for details (**Consent**).

If you are a Business Contact (at a Prospective or Current Client):

- **Contact Data:** Your name, job title, company name, email address, and phone number.
  - **Purpose and Lawful Basis:** To respond to your enquiries, provide you with information about our Services, and manage our business relationship (**Legitimate Interests**).
- **Contract & Billing Data:** Information needed to enter into and manage our contract with your company.
  - **Purpose and Lawful Basis:** To fulfil our commercial agreement with your company (**Performance of a Contract**).

If you are an Authorised User of our Services:

- **Identity & Access Data:** Your name, business email, and password.
  - **Purpose and Lawful Basis:** To create and manage your user account and provide you with secure access to the Services (**Performance of a Contract** with your employer).
- **Usage Data:** Information about how you use and interact with our Services.
  - **Purpose and Lawful Basis:** To provide customer support, improve our Services, and ensure security (**Legitimate Interests**).

If you are a Payee (an employee of our Client):

As explained in Section 2, we process your data as a **Data Processor** on behalf of your employer.

- **Personal Details:** Your full name, address, date of birth, and gender.
  - **Purpose and Lawful Basis:** To accurately identify you for payroll purposes. Your employer is responsible for the lawful basis for collecting this data. We process

it under the **Performance of a Contract** with your employer.

- **Employment & Financial Data:** National Insurance number, tax code, salary, bank account details, pension contributions, student loan status, employment start/end dates, and payslip information.
  - **Purpose and Lawful Basis:** To calculate your pay, deductions, and taxes, and to generate payslips and reports for HMRC as instructed by your employer. We process it under the **Performance of a Contract** with your employer.

4. How We Share Your Personal Data

We do not sell your personal data. We only share it in the following limited circumstances:
With Sub-processors: We use trusted third-party service providers to help us operate our business, such as cloud hosting providers (e.g., Amazon Web Services). These are our sub-processors, and we have contracts in place to ensure they protect your data. We maintain a list of our sub-processors on our website.
On the Instruction of our Clients: When acting as a Processor, we share Payee data with third parties like HMRC or pension providers as instructed by the employer (the Controller).
For Legal Reasons: We may share data with professional advisors (like lawyers or accountants) or if required by law, a court order, or a government authority.

5. International Data Transfers

We primarily store data within the United Kingdom. However, some of our sub-processors may be based outside the UK. Where we transfer personal data internationally, we will only do so using a legally valid transfer mechanism, such as an "adequacy decision" or by implementing Standard Contractual Clauses (SCCs) to ensure your data receives equivalent protection.

6. Data Security

We take the security of your data very seriously. We have implemented appropriate technical and organisational security measures, such as encryption, access controls, and staff training, to protect personal data from accidental or unlawful destruction, loss, alteration, or unauthorised access.

7. Data Retention

We will only retain personal data for as long as is necessary to fulfil the purposes for which it was collected.
As a Processor: We retain Payee data for the duration of our contract with the employer and for a short period after termination as defined in our **DPA**, or as required by law (e.g., UK law requires payroll records to be kept for 6 years).
As a Controller: We retain our own business data for as long as we have a legitimate business relationship, or until you ask us to delete it (where permissible).

8. Your Data Protection Rights

Under UK GDPR, you have rights over your personal data. These include:
The right to be informed: To know how we use your data (which is the purpose of this policy).
The right of access: To request a copy of the data we hold about you.
The right to rectification: To have inaccurate data corrected.
The right to erasure: To ask us to delete your data (the "right to be forgotten").
The right to restrict processing: To limit how we use your data.
The right to data portability: To receive your data in a machine-readable format.
The right to object: To object to us processing your data.
How to exercise your rights:
If we are the **Data Controller** for your data (e.g., you are a business contact), please contact us directly using the details below.
If we are the **Data Processor** (e.g., you are a Payee), you must direct your request to your **employer**, who is the Data Controller and legally responsible for handling your request. We will assist them as required by our DPA.

9. Changes to This Privacy Policy

We may update this policy from time to time. We will post the new version on our Site. If we make material changes, we will notify our clients by email as outlined in our **Master Subscription Agreement**.

10. How to Contact Us

If you have any questions about this Privacy Policy or our data protection practices, please contact us at:
Email: `privacy@flowpayroll.ai`
Address: Flow Payroll Limited, 7 Whitehall Gardens, London, England, W3 9RD

11. How to Complain

If you are unhappy with how we have handled your personal data, you have the right to lodge a complaint with the UK's data protection regulator, the Information Commissioner's Office (ICO). You can find their details at www.ico.org.uk.