

# Privacy Policy

Last update: May 27, 2025

## Introduction

Flexis, including its web-based platform and mobile applications ("Flexis", "we"), cares about user privacy and takes the protection of your personal data seriously. This Privacy Policy is designed to inform users about their rights as regards privacy and explain how we collect, process, retain, share, and transfer their personal data, keeping it secure every step of the way.

The Privacy Policy governs the processing of your personal data by Flexis companies when you visit or use our website at <https://flexis-hk.com> as well as any other websites, pages or content we operate (jointly the "website"), or request and/or use any products, services, functionality or applications (mobile apps) of Flexis (jointly the "services").

Your personal data is controlled by **Flexis Limited**, a company duly registered and operating under the laws of Hong Kong (Special Administrative Region of the People's Republic of China) under registration No. 77865722, registered at: Unit 915, 9/F., Concordia Plaza, 1 Science Museum Road, Tsim Sha Tsui, Hong Kong, that determine the purposes and means of processing your personal data. This Privacy Policy also applies to Flexis operators and all companies of the Flexis group, including legal entities, individual entrepreneurs, and consultants that provide services and are engaged in processing your personal data. All Flexis operators adhere to appropriate safeguards when processing your personal data in accordance with the EU General Data Protection Regulation (the "GDPR").

By accessing the website and/or using our services, you confirm your acceptance of the terms of this Privacy Policy. These implicit actions indicate that your consent to the processing of your personal data is freely given, specific, informed, and unambiguous. In cases where we are legally required to obtain your informed consent to process some categories of your personal data or to proceed with some other actions, we shall ask you for your specific consent. We may periodically modify this Privacy Policy as we undertake new personal data practices or revise procedures to comply with applicable laws. Please check back from time to time this page with our Privacy Policy to ensure you agree with any changes to it (the last update date is specified at the top of the Privacy Policy).

## Data Protection Officer

If you have any questions, requests, or complaints in relation to our privacy practices and this Privacy Policy, or you want to exercise your rights as regards privacy, please contact our Data Protection Officer at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com) or by mail at the postal address:

Flexis Limited, a company duly registered and operating under the laws of Hong Kong (Special Administrative Region of the People's Republic of China) under registration No. 77865722, registered at: Unit 915, 9/F., Concordia Plaza, 1 Science Museum Road, Tsim Sha Tsui, Hong Kong

## Personal data we collect and purposes it serves

We may collect:

- Information gathered directly from you. When you register, set up your account (personal profile), request, make use of our services, or communicate with us, you are asked to provide some necessary information about yourself that we use to serve your request or provide our services to you.

- Information collected when you visit our website or use the Service (including mobile applications). To the extent permitted under applicable laws, we may collect some technical and other information through various means (including cookies) on your interaction with the website and the Service. This helps us to improve our services, enhance the security of your account (personal profile) and the Service, and personalize your experience (for more information, refer to the "Cookies and tracking" section).
- Information from publicly available sources and third parties. We may collect information about you from your third parties and from open sources, including but not limited to social media, credit risk databases, and ID verification and KYC/KYB/AML web services to verify your identity and prevent fraud and other illegal activities, only doing so in accordance with applicable data protection laws.

Below are the categories of your personal data that we may collect and process, depending on what services you use and how you interact with the Service, its applications, or its website:

Identification data: Your full name, date of birth, gender, country, webcam photo or video, passport or other national identification documents, driver's license, tax identification number, tax status, a form of doing business/professional activities, and relevant documents.

Contact information: Address of residence or registration, email address, billing or delivery address, work address, telephone number, and documents confirming the address.

Social identification data: Information related to your work experience or profession (specialization, professional and educational background), information about your company, position in the company, ownership/shares in the company, information about recommendations (referrals and referees), information about your related and affiliated parties, your business contacts, behavioral data, compliance data (including risk assessments).

Financial data: Information on bank cards and other payment methods, bank accounts, e-wallets' and crypto wallets' IDs and addresses, information on transactions (date and time, TXIDs, etc.), calculated, the Service and other related information and documents.

Information generated when you interact with the Service or related to your activities in your personal profile in the Service (the "profile data"): Your user identification number, date of registration, date of acceptance of your agreement with Flexis and its number, your collaborators (contractors), verification status, invite delivery status, number of invited users, information about tasks and offers, the progress of rendering services/ performing works, materials related to your services/works, your payments or payouts, other information about transactions in the Service, your texts, voice and speech recordings, documents, requests (including those sent to our support), your requests regarding products, services or other functionality, your preferences, reviews, information from surveys, comments, as well as other information collected and/or generated in the course of your interacting with Flexis or using the Service.

Technical and usage data: Internet connection data, IP address, login, browser type and version, device type, category and model, location of your device, time zone settings, device language, application or SDK usage, preference settings, diagnostic data, information from cookies, advertising campaign tags, and other data stored or available in relation to your devices when you visit the website or use the Service, including its applications, as well as other information about how you use the website and applications.

Communication and marketing data: Your communication preferences, your marketing messaging preferences, consumer marketing profile, and other data.

In each case, Flexis makes every effort to collect the minimum possible amount of your personal data, limiting it to what is necessary for the processing purposes.

Purpose	Personal data categories	Legal basis (GDPR)
<p>To arrange and render our services for your benefit, and to enable you to perform under services/works agreements (as a contractor), including:</p> <ul style="list-style-type: none"> <li>- Registering with the Service</li> <li>- Conducting KYC/KYB procedures</li> <li>- Using the Service</li> <li>- Creating and working with offers</li> <li>- Handling tasks</li> <li>- Working on projects as a team</li> <li>- Saving your orders, services, and projects</li> <li>- Making payments to contractors</li> <li>- Communicating with you (sending notifications related to Service, processing your requests, and resolving issues through support)</li> <li>- Resolving and mediating disputes</li> <li>- Preparing reports and acts</li> <li>- Ensuring that our website and the Service are protected against security threats.</li> </ul> <p>To perform other actions to provide services/work or obtain their results under your agreements with Flexis.</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Financial data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> </ul>	<ul style="list-style-type: none"> <li>- Contractual or pre-contractual measures (Art. 6.1 (b) of GDPR)</li> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Compliance with legal obligations under applicable laws (Art. 6.1 (c) of GDPR)</li> <li>- Consent (Art. 6.1 (a) of GDPR, if applicable)</li> </ul>
<p>To enable users to create tasks using the voice and speech recognition feature that converts them to texts.</p>	<ul style="list-style-type: none"> <li>- Voice and speech recordings, texts</li> </ul>	<ul style="list-style-type: none"> <li>- Consent (Art. 6.1 (a) of GDPR; you can manage consent via your mobile device's settings)</li> </ul>
<p>To comply with applicable laws and to protect the legal interests of contractors, Flexis, and other stakeholders, we may implement measures to prevent and mitigate risks of money laundering and terrorism financing (ML/TF), credit risks, fraud, and other illegal activities, as well as conduct due diligence to verify compliance with applicable laws (including checks against sanctions lists).</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Financial data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> <li>- Data from publicly available sources</li> </ul>	<ul style="list-style-type: none"> <li>- Contractual or pre-contractual measures (Art. 6.1 (b) of GDPR)</li> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Compliance with legal obligations under applicable laws (Art. 6.1 (c) of GDPR)</li> <li>- Consent (if applicable)</li> </ul>
<p>To improve your experience with the Service along with its functionality, efficiency, and usability, and to make it more personalized. Where applicable, automate your interaction with the Service, provide interactive tips, guides, and notifications regarding the usage of the Service, and maintain internal services such as referral programs.</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Consent (Art. 6.1 (a) of GDPR, if applicable)</li> </ul>
<p>To improve user experience, website, products, services, marketing, and user relationships by conducting:</p> <p>(i) statistical research based on personal data of contractors, including survey data; (ii) troubleshooting of the Service (analyzing performance and functionality, fixing errors, etc.); (iii) data analysis.</p> <p>Study user behavior in their role as consumers, including user preferences, interests, and Service usage patterns in order to define marketing and business strategies for business development of Flexis.</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Consent (Art. 6.1 (a) of GDPR, if applicable)</li> </ul> <p>Depending on the device, your consent status may be changed in the device settings</p>

<p>To inform you about offers on special features, options, products and services of the Service, including by sending you targeted or personalized advertising through the Service or otherwise sending you marketing communications about products and services that we believe may be interesting or useful to you or that you have requested to stay updated about. Flexis may also provide you with reports about your activities in the Service or news of the Service or inform you about products or services provided by its subsidiaries, affiliates, and partners, including marketing partners.</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> </ul>	<ul style="list-style-type: none"> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Consent (Art. 6.1 (a) of GDPR, if applicable)</li> </ul>
<p>To facilitate business transfers that may include mergers or acquisitions, reorganizations or restructurings, assignments to group companies of Flexis or companies under common control or interest, rebranding, creation and launching of new products, and changes in business models and products.</p>	<ul style="list-style-type: none"> <li>- <a href="#">Identification data</a></li> <li>- <a href="#">Contact information</a></li> <li>- <a href="#">Social identification data</a></li> <li>- <a href="#">Profile data</a></li> <li>- <a href="#">Financial data</a></li> <li>- <a href="#">Technical and usage data</a></li> <li>- <a href="#">Communication and marketing data</a></li> </ul>	<ul style="list-style-type: none"> <li>- Contractual or pre-contractual measures (Art. 6.1 (b) of GDPR)</li> <li>- Legitimate interests (Art. 6.1 (f) of GDPR)</li> <li>- Consent (Art. 6.1 (a) of GDPR, if applicable)</li> </ul>

## Your rights

The GDPR and some countries' privacy laws provide certain rights to data subjects, which, subject to the applicable laws, you may exercise by contacting our DPO at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com).

**Right to be informed and right of access:** You may check if Flexis processes your personal data or get access to your personal data that Flexis has. You may also request information about the purposes of the processing, categories of personal data concerned, who we disclose your personal data to, source of the data (if it was not collected directly from you), envisaged period for which the personal data will be stored, and other information as per the applicable laws.

**Right to rectification:** You may request us to correct (rectify) the record of your personal data maintained by Flexis if it is inaccurate or incomplete.

**Right to erasure ("right to be forgotten"):** You may request that we erase your personal data or cease processing it, subject to certain exceptions.

**Right to restriction of processing:** In some cases, you may have the right to restrict our processing of your personal data.

**Right to data portability:** Where our legal basis for processing your personal data is contractual or pre-contractual measures, we will, if technically feasible and upon your request, provide your personal data to you or transmit it directly to another controller, subject to certain exceptions.

**Right to object:** You may object, on grounds relating to your particular situation, to the processing of your data. For example, if our legal basis for processing for direct marketing purposes is a legitimate interest, you have the right to object to such processing.

**Right to withdraw consent:** For processing requiring your consent, you can withdraw your consent at any time by contacting us at the email stated above. Such withdrawal of consent does not affect the lawfulness of the processing based on the consent given before exercising this right.

If you refuse to allow Flexis to process your personal data where Flexis needs to process your personal data by law, or under the terms of your contracts with Flexis, Flexis may not be able to enter into or perform these contracts, or you may not or will not be able to use certain functionality of the Service. Further, in some cases, Flexis may terminate the business relationship with you and/or delete your account (personal profile) in the Service, and/or continue processing your personal data without your consent on the grounds specified in Art. 6.1 of GDPR and/or in accordance with other applicable laws.

**Right not to be subject to decisions based solely on automated processing, including profiling:** Flexis may rely on automated services, including profiling, to determine whether an account poses legal risk or another type of risk. Please note, however, that Flexis shall not make any decision

whose legal effects would significantly affect you based solely on the processing of your personal data by automated (technological) means without any human involvement. The Flexis team will review any decision that is made based on the algorithm. If you have any concerns regarding this matter, please contact us so we can resolve them.

Reasonable access to your personal data and other related information shall be provided at no cost upon request made to Flexis at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com). We shall respond to your request within 30 days from the day of its receipt, unless applicable law specifies otherwise. If the response cannot be provided within this time frame, we shall give you a date estimate for when the information shall be provided. If we cannot satisfy your request, we shall specify the reason and inform you about your additional rights.

**Right to lodge a complaint with the competent supervisory authority:** Under the laws of many countries, you have the right to lodge a complaint with the appropriate data protection authority if you have concerns about the way we process your personal data.

## **Personal data of children and minors**

We do not knowingly collect, process, store, use or disclose the personal data of individuals who have not reached sufficient legal capacity to perform works and/or render services in the Service under the national laws of the country of citizenship and/or permanent residence of the data subject, unless otherwise provided by applicable laws.

You must not use the Service if you: (1) do not have the sufficient legal capacity to use the Service in accordance with the national laws of your country of citizenship and/or permanent residence; and (2) have not obtained all the necessary permissions and consents to perform work and/or provide services in the country of which you are a citizen and/or in which you permanently reside and/or from which you access and/or plan to use the Service.

## **Sensitive and special categories of personal data**

We collect and process sensitive user data only for the purposes as defined in this Privacy Policy and in compliance with applicable laws. We have implemented strict security measures to safeguard this information and comply with applicable privacy laws.

We observe KYC (Know Your Customer) requirements, so we must verify your identity. This verification process includes comparing your passport or ID photo to the biometric parameters of your face captured during a live web camera session. We ask for your consent to processing your biometric data by a processor of our choosing or us. You can withdraw your consent at any time by contacting us at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com).

In order for us to give you the best user experience and enable you to create tasks easily, the Flexis mobile application, subject to the settings of your mobile device, may process your speech and voice to recognize them and convert them into text. You can restrict such processing at any time in the settings of your mobile device. In other situations, unless otherwise provided by law, we shall obtain your consent before using your voice and speech (for example, in your phone calls with Flexis).

## **How we process personal data**

Flexis may take any action with respect to your personal data that is permitted by applicable law and that is necessary or desirable for achieving the above purposes, including, without limitation, collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (disclosure, provision, access), segmentation, depersonalization, blocking, deletion, or destruction of personal data, as well as any other actions in respect of your personal data subject to applicable laws.

Flexis uses data processing methods such as non-automated processing of personal data, automated processing of personal data with or without transmission of the received information via information and telecommunication networks, and mixed processing of personal data.

## **Automation of user interaction**

Flexis strives to ensure maximum convenience and efficiency in communicating with its users, as well as quick responses to users' typical questions and situations that arise in the course of their interaction with the Service. For these purposes, your personal data may be processed, including through third-party services and automated data processing, to promptly send you interactive content, notifications, and guides on working and/or interacting with the Service. If you believe that such automated processing of your data has a negative effect on you and you do not agree with such processing, you can contact us at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com). We shall review your particular circumstances and act accordingly.

## **Cookies and tracking**

Like many other websites, the Flexis website uses cookies. Please refer to the Flexis Cookies Policy to learn about the types of cookies we use, which purposes we pursue, and how you can withdraw your consent to the use of cookies.

## **International transfers of personal data**

Flexis may transfer your personal data outside of the European Economic Area. When doing so, Flexis puts in place appropriate technical and organizational safeguards (including Standard Contractual Clauses) to ensure that such transfers are carried out in compliance with applicable data protection laws, except where the country to which the data is transferred has already been determined by the European Commission to provide an adequate level of protection.

## **Business transfers of personal data**

In corporate or business transactions involving Flexis Limited and/or companies of the Flexis group, your personal data might be shared with another company, affiliated or not, who is involved in the transaction (hereinafter referred to as the "engaged business entity") for the purpose of processing personal data in accordance with the aforementioned objectives and in compliance with applicable data protection legislation. Such transfers may involve, among other things, allocation and storage of data in other databases, IT solutions, or online platforms (hereinafter referred to as the "platform"). These transactions may include mergers or acquisitions, reorganizations or restructurings, assignments to group companies of Flexis or companies under common control or interest, rebranding, creation and launching of new products, and changes in business models and products. In any case, the engaged business entity or the platform will be required to adhere to the terms of this Privacy Policy regarding your personal information.

By continuing to use our services or new services or products, you consent to the transfer of your personal data as described above and agree that the engaged business entity or the platform may continue to process your personal information as set forth in this Privacy Policy.

You have the right to exercise control over your personal data. If you do not agree with the transfer of your personal data in accordance with this section, we respect your decision and encourage you to discontinue your use of our services. We will inform you via email and/or notice on our website and/or within your personal profile of any significant restructuring or change affecting you regarding the use of your personal data. If you disagree, you may exercise your data subject rights as outlined in the "Your rights" section.

If you have concerns, please contact us (referring to the "Questions, concerns, or complaints" section of this Privacy Policy).

## **When and how we share information with others**

To provide our services, ensure the security of the Service, and comply with anti-money laundering regulations, other applicable laws, and existing legal arrangements related to your use of the Service, we may share your personal data with third parties. These third parties include payment service

providers and banks (to fulfil your payment requests), KYC/KYB/AML service providers (for due diligence purposes, to comply with applicable laws and fulfil existing legal arrangements related to your use of the Service), and messaging services. We do not sell your personal data to any organization.

Flexis may share your information with such third parties, including but not limited to the aforementioned parties. If you disagree with the processing of your personal data as described, you have the right to restrict Flexis from such processing. However, this may restrict your access to and use of the Service.

KYC/KYB/AML service providers:

- Sum & Substance Ltd  
[Privacy Notice](#)  
[CCPA Privacy Notification](#)

Payment providers and banks:

- FENIGE SP. Z O.O.  
[Email: contact@fenige.eu](mailto:contact@fenige.eu)
- PayPal, Inc  
[Privacy Statement](#)
- Paymaster24  
[Privacy Policy](#)
- WM Transfer Ltd  
[Privacy Policy](#)
- dLocal Limited  
[Privacy Notice](#)
- Ecommbx Ltd (ECOMMBANX)  
[Privacy Statement](#)
- Quicko Sp. Z O. O.  
[Privacy Policy](#)
- Unlimit EU Ltd  
[Privacy Notice](#)
- TransferWise Ltd  
[Privacy Policy](#)
- INXY PL Sp. z o.o.  
[Privacy Policy](#)

Messaging services, business management solutions, analytics services:

- [Intercom](#)  
(Intercom R&D Unlimited Company)  
[Privacy Policy](#)
- [QSOFT LLC](#)  
[Privacy Policy](#)
- [AppsFlyer](#)  
(AppsFlyer Ltd, AppsFlyer Germany GmbH)  
[Website Privacy Policy](#)  
[Services Privacy Policy](#)
- [Iterable](#)  
(Iterable, Inc., Lionheart Squared LTD,  
Lionheart Squared Limited)

Privacy Policy

- Google Analytics 4  
[GA4] EU-focused data and privacy
- HubSpot  
Privacy Policy
- Bubble  
GDPR - Data processing agreement addendum

Access to your personal data may also be given to other partners of Flexis and third-party service providers, such as IT solution suppliers and cloud service providers, payment service providers and banks, insurance agents, advisory and professional service providers, couriers, legal advisors, partners of Flexis having similar to Flexis business models, etc., to enable Flexis to render services to you or conduct its business more efficiently and effectively.

These third parties have their own privacy policies and practices regarding the processing of personal data. By consenting to this Privacy Policy, you also consent to the processing of your personal data in accordance with the privacy policies of these third parties, including the aforementioned parties. Please note that these third-party privacy policies may be updated from time to time, and it is your responsibility to periodically review them to stay informed about their data processing practices. Flexis does not assume any responsibility for the privacy practices or the content of these third-party services.

If you are a contractor, we may disclose your personal data to:

- (i) the customers of Flexis; the disclosures include your full legal name, telephone number, email, specialization, dates of invitation to and registration with the Service, country, tax identification number (tax identification code), tax status, information on calculated, withheld and paid taxes and other charges payable by you from remuneration received from Service, verification status, invite delivery status, payment methods, your invoices, works/services acceptance acts, and other information as required by applicable laws. This is necessary so you can accept tasks, participate in projects, and perform works / render services within the scope of such tasks and projects under the Contractor Offer Agreement on Performance of Works and Rendering of Services. As regards your other personal data that you may provide to us (e.g., your passport details), we shall obtain your express consent before disclosing such data to customers of Flexis, unless otherwise provided by applicable laws.
- (ii) other contractors in the Service who invite you to the Service to create a team of contractors, and/or to contractors who are in your team in the Service. Such disclosures include your full legal name, email, specialization, dates of invitation to and registration with the Service, country, tax status, verification status, invite delivery status, and other information as required by applicable laws. This is necessary so you can join teams of contractors in the Service, accept tasks and participate in projects, and perform works/render services within the scope of such tasks and projects under the Contractor Offer Agreement on Performance of Works and Rendering of Services.
- (iii) **If within the scope of the Service, you are involved in performing a task (work/services) subject to applicable advertising laws (and any other regulations governing the placement of advertising and its labelling) or other tasks subject to special disclosure requirements established by applicable laws, you hereby expressly agree that your personal data may be disclosed to customers of Flexis (and/or task beneficiary) and other participants associated with the execution of such task (if necessary) for the purpose of fulfilment by the Service/other participants involved in the process of the task execution/setting, of the requirements of the legislation on advertising (advertising labelling) and/or other applicable laws.** Your personal data that may be disclosed under this provision includes but is not limited to your verification data, the content of your tasks in the Service, and any other available information related to such tasks, your Offer Agreement, your invoices, and documents in the Service related to or associated with the relevant task.

We may also be required to share users' personal data of contractors with various financial institutions and/or enforcement or court authorities to comply with applicable laws, prevent fraud, enforce contracts and agreements we have with you, or protect our rights, property or safety, or the rights, property or safety of our employees and other parties.

Additionally, we may reveal your personal data to third parties if: (1) you request or authorize it; (2) to address emergencies or acts of God; and (3) to address disputes or claims, as well as to persons that provide a legally sufficient power of attorney.

*Personal data you may choose to share on social media:*

When it is provided by the functionality of the Service, you can share some of your information, including reports on your activities in the Service contained in and processed through your personal profile in the Service (or generated through third-party services providers), on third-party services, like social media or messaging platforms or otherwise display your information in the public areas. By proceeding with the sharing of your personal data (by activation of a “share” or “post” checkbox/button or by other means), whether on social media platforms or any other public channels, you explicitly consent to making this personal data publicly available. This means that individuals who have access to the shared link or post will be able to view, analyze, or otherwise process the information included in your publication. It's important to note that these third-party services (social media sites) operate independently from the Service and maintain their own privacy policies governing data processing, which may be subject to updates over time.

Moreover, if you register in the Service through a third-party social media site (if it is provided by the functionality of the Service), your publicly available profile on the third-party social media site may be viewed or otherwise processed by Flexis.

## **Secure data handling procedures**

We prioritize the security and confidentiality of personal and sensitive user data at Flexis. We have implemented rigorous data handling procedures (physical, technical, and administrative safeguards) to ensure its protection. These procedures include robust encryption methods, strict access controls, data minimization practices, secure storage systems, employee training on data security, appropriate disciplinary measures to enforce our employees’ responsibilities as regards ensuring privacy, incident response protocols, third-party compliance requirements, and regular audits and assessments. Besides, we update and test our security technology on an ongoing basis.

## **Marketing communications and direct marketing**

We may use some of your personal data to decide which products, services, special functions, and offers of Flexis may be of interest to you. You may receive marketing emails and text messages (marketing communications) from Flexis if you request information from Flexis and/or agree to receive marketing communications from Flexis, or if you are a registered user of the Service and you do not opt out of receiving such communications. Flexis may send you marketing communications and other communications through such communication channels and/or in such forms as SMS, MMS, emails, account notifications (in the form of direct messages or banners), push notifications, social networks, and phone calls, messengers (including, but not limited to Telegram, What’s App, Viber), among others.

Flexis may use various types of marketing communications, including direct marketing. By registering with Flexis and accepting the terms of this Privacy Policy, you consent to Flexis processing your personal data and communicating and interacting with you for direct marketing purposes. In addition, where applicable, the basis for the processing of your personal data shall be our legitimate interest in accordance with Art. 6.1(f) GDPR. As part of direct marketing or other types of marketing, Flexis may (but is not obliged to) process your personal data and send you newsletters, promotional offers or other informational and/or marketing materials, subscriptions and messages, or invite you to participate in events and advertising campaigns, as well as conduct surveys, research, and questionnaires with your participation (including for determining other user data indicators, and/or developing the functionality of the Service), and use other online marketing tools. Flexis reserves the right to at any time review and change the content of marketing messages, technologies used for marketing purposes, and methods for segmenting user groups (target groups). For example, a group of contractors may receive a special newsletter offering some Service’s functions for contractors who perform design tasks. Other newsletters may be aimed at informing contractors from certain countries about the available options for withdrawing remuneration. Also, Flexis may send you personalized marketing messages or direct emails, including with regard to the history of your actions in and/or interaction with the Service, in order to further personalize Flexis and better cater to user needs.

For marketing purposes, Flexis may use automated services (including third-party services) and profiling. The personal data processed by Flexis for marketing purposes is specified in the "Personal data we collect and purposes it serves" section above under "Personal data categories."

You have the right to at any time restrict Flexis from processing your personal data for the purposes of direct marketing, market research, and profiling conducted by Flexis for direct marketing purposes at any time by emailing [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com), or, if applicable, by following opt-out instructions contained in our marketing email or message sent to you, or by using the functionality of your device (if supported).

Your opting out of receiving marketing communications shall not apply to service emails, text messages, and phone calls that are directly related to your use of the Service and performance of your agreements with Flexis (e.g., notifications about being invited to the Service, tasks, verification status, payments, change in the Service terms of use, security messages, etc.).

Flexis may compile and/or generate targeted/personalised reports for you related to your access to and use of the Service, aiming to enhance your loyalty, user experience, and for marketing purposes. For example, this includes an activity report for your year (or other period) in the Service. To prepare such reports, Flexis may share your information with third parties, including [Bubble](https://bubble.io) (<https://bubble.io>, refer to Bubble's [GDPR - Data processing agreement addendum](#)), [HubSpot](https://www.hubspot.com) (<https://www.hubspot.com>, refer to HubSpot's [Privacy Policy](#)), [Intercom](https://www.intercom.com) (<https://www.intercom.com>, refer to Intercom's [Privacy Policy](#)), as well as other Flexis's marketing and development partners. These reports may subsequently be provided to you by means of third-party landing pages, email communication, or through the Service. If you do not agree with the mentioned processing, you have the right to restrict Flexis from such processing of your personal data. You can do so by emailing [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com) or, if applicable, by following opt-out ("unsubscribe") instructions contained in a corresponding email or message sent to you.

## **Data storage and retention**

Flexis retains your personal data to enable your use of the Services for the period required to fulfill the relevant legitimate purposes described above, or as may be required by applicable laws (for example, for tax and accounting purposes or anti-money laundering regulations, or to address future legal disputes or claims). In addition, we may store, including in document form, some of your data related to the execution of civil law relations and other legal relations under the Offer Agreement and additional agreements with Flexis that you accepted when registering with and/or working in the Service for the purposes related to legal relations arising due to the involvement of Flexis and in accordance with applicable laws. Once the retention period expires or the data is no longer necessary, it will be securely deleted.

## **Data deletion**

We respect individuals' rights to the deletion of their personal data as permitted by applicable laws. Data subjects have the right to request the deletion of their personal data at any time, and we will take appropriate measures to fulfill these requests in a timely manner, ensuring compliance with GDPR requirements and safeguarding individuals' privacy rights. Upon receiving a valid data deletion request, we will review and respond to it within 30 days. However, certain exceptions, such as obligations related to Anti-Money Laundering laws and other legal requirements, may limit our ability to immediately fulfill data deletion requests. In cases where data retention is necessary to comply with Anti-Money Laundering laws or other legal obligations, we will retain the personal data for the required period. Once the retention period expires or the legal obligations no longer apply, we will promptly and securely delete the data in accordance with applicable laws. This includes the deletion of data stored in our databases, backups, and third-party systems used for data processing. In any case, we will make reasonable efforts to comply with data deletion requests within the boundaries set by relevant legal exceptions and requirements.

### *Deleting freelancer account: \**

If you're a freelancer, you can delete your personal profile. To do so, log in to your personal profile, navigate to "Preferences" and click "Delete account" in the section "Security". *\* Please note that this option may be temporarily unavailable. At any time, you can request an account deletion by emailing at [dpo@flexis-hk.com](mailto:dpo@flexis-hk.com)*

## **Changes and updates to the Privacy Policy**

Because our company and services change from time to time, this Privacy Policy can also be expected to change. We reserve the right to amend it at any time, for any reason, and without any notice to you other than the posting of the amended Privacy Policy on this website. We may email periodic notices regarding our terms and conditions or material changes thereto, but you should still regularly check our website to review the current amended version of the Privacy Policy. The provisions herein supersede all previous notices or statements regarding our privacy practices and the terms and conditions governing this website's use.

By using the Flexis website and services, you agree to the terms and conditions of this Privacy Policy and any other agreement we may have with you. If you do not agree to these terms and conditions, you should not use this website or any Services.

This Privacy Policy may be published in different languages. In case of any discrepancy, this English version shall prevail.

## **Questions, concerns, or complaints**

Contact us at:

Flexis Limited, a company duly registered and operating under the laws of Hong Kong (Special Administrative Region of the People's Republic of China) under registration No. 77865722, registered at: Unit 915, 9/F., Concordia Plaza, 1 Science Museum Road, Tsim Sha Tsui, Hong Kong

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