

PRIVACY POLICY

NextflowX — a brand of Heron Log Limited

In compliance with the rights recognized by European Regulation No. 679/2016 (also known as the “GDPR”), we hereby provide you with the following information regarding the processing of your personal data:

1) Data Controller

The Data Controller is Heron Log Limited – 414-424 Jaffe Road, Unit B, 12/F, Chinaweal Center, Wanchai, Hong Kong – Email: nextflowx@nextflowx.com

NextflowX is a commercial brand of Heron Log Limited. All services offered under the NextflowX brand are provided by and invoiced by Heron Log Limited.

2) Legal Basis and Purpose of Processing

The processing of personal data carried out by the Data Controller within commercial relationships being established pursues the following purposes:

- prior to the establishment of the commercial relationship, collecting information necessary for preparing quotations for the activities and services requested by the Data Subject;
- following the conclusion of the contract, managing and executing the commercial relationship and properly fulfilling the related contractual obligations, as well as obligations provided for by laws, regulations, or EU legislation, particularly regarding tax matters and accounting records;
- sending commercial communications relating to the Controller’s products and/or services;
- protecting interests arising from the contract.

The legal basis for the processing is therefore:

- the performance of pre-contractual measures taken at the data subject’s request;
- the performance of a contract to which the client is a party and/or compliance with a legal obligation to which the Controller is subject;
- the pursuit of the Controller’s legitimate interests, without prejudice to the Data Subject’s right to object at any time;
- the Controller’s legitimate interest in protecting its legal position.

3) Provision of Data and Possible Refusal

During the pre-contractual phase, providing data is optional.

During the contractual phase, providing data is mandatory. Any refusal will make it impossible to continue the Service.

4) Nature of the Data Processed

Processing concerns only common personal data (such as first and last name or company name, tax code or VAT number, physical or email address or registered office, contact details, and bank details).

5) Methods of Processing

Processing may be carried out in both paper and electronic formats, in compliance with corporate security measures adopted in accordance with Article 32 of the GDPR.

6) Communication and Disclosure of Data

Clients' common personal data will not be publicly disclosed but may be communicated, for the performance of the requested activities, to the following parties:

- banks;
- external consultants supporting the Controller in regulatory compliance;
- public authorities.

Where processing is carried out with the ongoing professional support of third parties, such parties will be appointed as Data Processors. Their details are available at the company's registered office.

7) Data Transfer Abroad

The transfer is necessary for the performance of a contract between the data subject and NextflowX (a brand of Heron Log Limited), or for the execution of pre-contractual measures requested by the data subject.

8) Retention Period

Data will be processed for the time necessary to achieve the purposes indicated above.

In particular, for tax purposes, the Client's personal data contained in invoices will be retained for at least 10 years from the termination of the individual contract, in order to comply with tax and fiscal obligations.

Data will be stored at the Controller's premises and at the external processor responsible for accounting and tax declarations.

With regard to promotional communications, you will always have the right to object to processing; in such case, your email will no longer be used for advertising purposes.

9) Profiling

The Controller does not carry out any automated processing for profiling purposes.

10) Rights of the Data Subject

The Regulation grants the Data Subject, namely the individual to whom the processed data refers, the following rights:

The Data Subject may obtain confirmation from the Controller as to whether personal data concerning them exists, know the origin of such data and the characteristics of the processing, and request deletion, updating, rectification, or completion of the data. They may also object to the processing and obtain data portability where legal requirements are met.

Requests may be sent by email to: nextflowx@nextflowx.com or by registered mail to the Controller's registered office: Heron Log Limited – 414-424 Jaffe Road, Unit B, 12/F, Chinaweal Center, Wanchai, Hong Kong.