

FLOCSAM

PRIVACY POLICY

1 FEBRUARY 2025

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DATA CONTROLLER:

THOMAS FLEURIOT, TRADING AS “FLOCSAM”

NETHERLANDS KVK NUMBER: 91087872

FLOCSAM KEEPS FIVE DATABASES

1 People database, containing:

NAME

WORK EMAIL (IF YOU HAVE GIVEN IT)

EMPLOYER

LAST CONTACT (DATE & SUMMARY)

NEXT CONTACT

HOW WE THINK WE CAN HELP

2 Companies database, containing:

NAME

INDUSTRY

LEGAL TEAM SIZE & SPEND

CONTRACT HISTORY

TARGET NEXT CONTACT

3 List of mailing list email addresses

4 Anonymised data showing how users navigate our site.

5 Anonymised data showing how users came to our site.

WE HOLD OR TOUCH DATA VIA:



1	Microsoft Office 365 for Business	WE RELY ON (CLICK ON TEXT TO VIEW) MICROSOFT PRODUCTS AND SERVICES DATA PROTECTION ADDENDUM (DPA)
2	Hubspot (EU setting)	HUBSPOT DATA PROCESSING AGREEMENT
3	LinkedIn	LINKEDIN PRIVACY POLICY
4	MailChimp	MAILCHIMP DATA PROCESSING ADDENDUM

Discovery / removal: To request exactly what we have about you, data deletion or amendment: email tom@flocsam.com. We'll reply within ten working days.

Complaints: Dutch DPA.

WE HAVE FOUR RULES FOR DATA ABOUT HUMANS

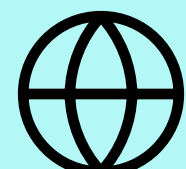


- 1** Only take or keep data that we actually review monthly.
- 2** Only record data from LinkedIn or from communications instigated by that person.
- 3** Keep the data confidential.
- 4** Never sell or trade the data.

CONTACT US:



REPORT US:



IF YOU VISIT FLOCSAM.COM



We use plausible.io. This uses no cookies and is fully compliant with GDPR, CCPA and PECR.

We record what visitors clicked on to get here (webpage, app, or email).

The information is stored anonymously and deleted after two years.

We use this to understand how people heard about the site.

We capture nothing else from people on arrival to the site.

CONTACT US:



REPORT US:



IF YOU BROWSE FLOCSAM.COM



We use plausible.io. This uses no cookies and is fully compliant with GDPR, CCPA and PECR.

We record the page journey and the point when you leave the site.

The information is stored anonymously and deleted after two years.

We use this to understand the quality of our content on the site.

We capture nothing else from people browsing our site.

CONTACT US:



REPORT US:



IF YOU JOIN OUR MAILING LIST



We save your email to our People database and your employer to our Company database.

We email periodic newsletters via MailChimp until you unsubscribe or ask that we delete you.

We will not email you for direct sales - although we may follow you on LinkedIn.

We capture nothing else from people who download our documents.

We use Hubspot (EU version with “Data Privacy Settings” feature enabled) and MailChimp.

CONTACT US:



REPORT US:



IF YOU CONTACT US DIRECTLY



We save your email to our People database and your employer to our Company database.

We follow a “two unanswered follow-ups maximum per year” protocol.

We archive your profile if your company does not buy from us in two years.

We delete your profile within ten working days of being asked, or if no purchases in four years.

We use the Hubspot EU version, with the “Data Privacy Settings” feature enabled.

CONTACT US:



REPORT US:



IF YOU USE US FOR SERVICES



We record the fact of the contract in our Company database.

We treat all company employee contact details as if they contacted us directly.

We archive the company if it does not buy from us in a four year period.

We delete your profile within ten working days of being asked.

We use the Hubspot EU version, with the “Data Privacy Settings” feature enabled.

CONTACT US:



REPORT US:



LEGIMATE INTERESTS ASSESSMENT



LAST UPDATED: 1 FEBRUARY 2025

NEXT REVIEW: 1 AUGUST 2025

Legitimate Interests is the legal basis for our personal data processing.

We have not only conducted a Legitimate Interests Assessment, we have also published it online here for full transparency.

We don't consider there to be potential risks, nor significant impact, to people in our CRM. A more detailed Data Protection Impact Assessment feels disproportionate.

We take only the name and business email or LinkedIn contact details of individuals, plus our notes on interactions and contact plans. We take this information only after an interaction related to the services we provide. We only either email people as a reply to a query, or if they sign up to our mailing list (from which they can unsubscribe).

Processed information is proportionate and necessary to identify and interact with potential clients with whom we market, follow up, make offers to, provide, and run aftercare for our services. Information is managed in the way that any individual would understand and reasonably expect. It is not intrusive, and there is no less intrusive way to achieve the same result.

If someone could say (which we would not) individual's interests are impacted by our acts, the impact doesn't override our legitimate interests.

This concludes our Legitimate Interest Assessment.

GLOSSARY & CLARIFICATIONS



AMENDMENTS if we plan to change how we handle data, we will first review this privacy policy. If we think the change means less protection, we will inform you in advance and offer to delete your data first.

ARCHIVING Archiving your profile means that we can reactivate it if you contact us again, but cannot access it in the meantime.

BREACH if there is a data breach we will report it in the manner and timeframes required by the law.

CORRECTIONS If you ask us to amend (rather than delete) the data that we hold on you, we will.

DELETIONS If you ask us to delete the data that we hold on you, we will do so of course.

DATABASE VISIBILITY If you ask us to share the data that we hold on you, we will take reasonable steps check the request is actually from you. Then we'll share what we have.

GEOGRAPHY we work mostly in the EU and the UK. When we transfer information outside of the EU or UK we take care

IMPACT OF REQUESTS we will not take any retaliation, reaction or negative inference from any requests to access, correct or delete your data, or to unsubscribe. We would never want to be such a bunch of jerks.

LAWS we have assessed our activity against personal data laws of EU, UK, and US (including California). We're comfortable that we comply with the letter and spirit of these laws.

TRADING DATA by "never sell or trade the data" (page 2), we mean that the only third parties who can technically access data will be (1) the software providers identified in this privacy policy, or (2) any IT support company who we will contract under an obligation to be consistent with this policy. We will never share, sell, disclose, exchange, or offer access to the data to anybody else.

UNSUBSCRIBE vs DELETE If you ask to be unsubscribed from a mailing list, we will unsubscribe and check whether you want to be deleted from our CRM. If you ask to be deleted from our database, you will be deleted and also unsubscribed. Because we can't email you if we have deleted your email address.

CONTACT US:



REPORT US:

