

Politica de confidentialitate

Data intrarii in vigoare: 16 octombrie 2026

Aceasta politica explica ce date personale prelucram, de ce, pe ce temei legal, cat timp le pastram si ce drepturi ai, in conformitate cu Regulamentul (UE) 2016/679 (GDPR) si legislatia romana aplicabila.

1. Cine suntem

Flow Capital SRL, care opereaza sub marca Flow Advisory, este operatorul datelor tale personale.

- Sediul: str. Dacia nr. 25, bl. U5, ap. 6, Oradea, judetul Bihor, Romania
- CUI: 43509475; Nr. Registrul Comertului: JO5/2407/2020
- E-mail: razvan.pop@flow-advisory.ro
- Telefon: +31 630 952 995
- Website: www.flow-advisory.ro

Nu am desemnat un responsabil cu protectia datelor (DPO), deoarece nu suntem obligati legal. Pentru orice intrebare legata de date personale ne poti scrie la adresa de e-mail de mai sus.

2. Ce date prelucram

Prelucram doar datele de care avem nevoie pentru a comunica si a lucra cu tine:

- Date de identificare si contact: nume, prenume, e-mail, telefon.
- Date profesionale: companie, functie, date de contact profesionale.
- Datele introduse in formularele instrumentelor online (de exemplu formularul de acces la Competition Benchmark, atunci cand este activ): nume, companie, e-mail de business, telefon (optional) si interesul declarat.
- Date de facturare, doar daca devii client: denumirea companiei, adresa, cod fiscal, cont bancar al companiei.
- Continutul mesajelor pe care ni le trimiti.
- Date tehnice de navigare: adresa IP, tipul de browser si de dispozitiv, paginile vizitate, colectate automat prin cookie-uri si jurnale tehnice ale furnizorilor de gazduire.

Nu colectam date din categorii speciale (de exemplu date de sanatate) si nu iti solicitam codul numeric personal sau copia actului de identitate.

3. Instrumente online

3.1 Calculatorul de evaluare

Datele financiare pe care le introduci in calculatorul de evaluare de pe www.flow-advisory.ro (cifra de afaceri, EBITDA, datorii, numerar, raspunsurile la intrebarile de risc) sunt procesate exclusiv in browserul tau. Nu sunt transmise catre Flow Advisory si nu sunt stocate de noi. Furnizorul care gazduieste calculatorul poate inregistra, ca orice server web, date tehnice precum adresa IP in jurnale, pentru securitate si functionare.

3.2 Competition Benchmark

Competition Benchmark afiseaza indicatori financiari si estimari pentru companii din Romania. Datele provin din surse publice: situatiile financiare anuale publicate de Ministerul Finantelor si datele de identificare ale companiilor (denumire, CUI, cod CAEN, judet) din registrele publice. Indicatorii precum EBITDA, NOPAT, capitalul investit, ROIC sau zilele de capital circulant sunt estimari proprii, orientative.

Aceste date privesc persoane juridice si, ca regula, nu sunt date cu caracter personal. Instrumentul nu contine date despre administratori, asociati sau beneficiari reali si nu contine adrese de e-mail sau numere de telefon ale persoanelor fizice.

Daca denumirea unei companii cuprinde numele unei persoane fizice sau consideri ca o informatie din instrument te priveste personal, ne poti scrie la razvan.pop@flow-advisory.ro. Analizam cererea in cel mult o luna si, dupa caz, corectam sau restrictionam afisarea. Datele raman disponibile in sursele publice oficiale, pe care nu le controlam.

Agregatele (totaluri pe sector, judet si marime) se calculeaza in browserul tau. Datele la nivel de companie (cautarea, profilul unei companii, clasamentele) sunt furnizate la cerere de un server al instrumentului, gazduit de Netlify. Selectiile si filtrele tale sunt transmise serverului doar in masura necesara pentru a raspunde cererii si nu sunt asociate cu identitatea ta.

Pentru a preveni extragerea automata a datelor, serverul aplica limite de utilizare pe adresa IP. Adresa IP este transformata intr-un identificator pseudonimizat (hash cu cheie secreta), asociat doar cu numarul de companii vizualizate, si este stearsa automat dupa cel mult 2 zile. Temeiul este interesul nostru legitim de a proteja instrumentul si datele (art. 6 alin. 1 lit. f GDPR).

Instrumentul incarca biblioteci tehnice (pentru exportul PDF) de pe cdnjs.cloudflare.com, operat de Cloudflare. Ca orice server web, acesti furnizori pot inregistra adresa IP in jurnale, pentru securitate si functionare.

3.3 Formularul de acces si contact din instrumente

Atunci cand accesul la un instrument presupune completarea unui formular, prelucram datele mentionate in sectiunea 2 pentru a-ti oferi accesul, pentru a raspunde interesului declarat si pentru a te contacta in legatura cu servicii relevante pentru compania ta. Temeiul este interesul nostru legitim (art. 6 alin. 1 lit. f GDPR). Te poti opune oricand.

Datele din formular sunt transmise prin serverul instrumentului (Netlify) catre un tabel Google Sheets din contul nostru Google Workspace. Serverul pastreaza si o copie de siguranta a formularului, stocata la Netlify, cu aceeasi durata de pastrare. In browserul tau se salveaza doar doua elemente tehnice (localStorage): un indicator care retine ca ai completat deja formularul, ca sa nu il completezi din nou, si un cod tehnic, valabil 90 de zile, care iti ofera limite de utilizare mai mari. Acestea nu sunt folosite pentru urmarire.

4. De unde avem datele

- Direct de la tine: cand ne scrii pe e-mail, prin formularul de contact, prin formularele instrumentelor online sau prin LinkedIn, cand ne suni, cand participi la un eveniment sau cand devii client.
- Din surse publice, in context profesional: de exemplu profilul tau public de LinkedIn sau site-ul companiei tale.
- Din surse publice oficiale, pentru datele despre companii afisate in Competition Benchmark: Ministerul Finantelor si registrele publice ale companiilor.
- Automat, cand vizitezi website-ul sau instrumentele online (vezi sectiunea 9, Cookie-uri).

5. De ce prelucram datele si pe ce temei legal

- Raspunsul la solicitarile tale (mesaje, cereri de oferta, programarea unei discutii): interesul nostru legitim de a raspunde persoanelor care ne contacteaza, respectiv demersuri inainte de incheierea unui contract (art. 6 alin. 1 lit. f si b GDPR).
- Furnizarea instrumentelor online si accesul prin formular: interesul nostru legitim de a pune la dispozitie analize de piata si de a raspunde interesului declarat (art. 6 alin. 1 lit. f).
- Prestarea serviciilor si administrarea relatiei contractuale: executarea contractului (art. 6 alin. 1 lit. b).
- Facturare, contabilitate si obligatii fiscale: obligatie legala (art. 6 alin. 1 lit. c).
- Invitatii la evenimente: consimtamantul tau, pe care il poti retrage oricand (art. 6 alin. 1 lit. a).
- Comunicare profesionala si dezvoltarea relatiilor de afaceri (de exemplu mesaje pe LinkedIn catre persoane din mediul de afaceri): interesul nostru legitim de a ne promova serviciile catre profesionisti, in limitele asteptarilor rezonabile ale acestora (art. 6 alin. 1 lit. f). Poti obiecta oricand.
- Functionarea, securitatea si statisticile website-ului: interesul legitim (cookie-uri strict necesare) si consimtamantul tau (cookie-uri de statistica sau marketing).

Atunci cand ne bazam pe interesul legitim, am evaluat ca acesta nu prevaleaza asupra drepturilor si libertatilor tale: prelucram doar date profesionale, in context de afaceri (B2B), in masura in care te-ai putea astepta in mod rezonabil, si iti poti exercita oricand dreptul de opozitie. La cerere, iti putem oferi informatii despre aceasta evaluare.

Furnizarea datelor este voluntara. Fara datele de contact nu iti putem raspunde, iar fara datele de facturare nu putem incheia un contract.

Nu luam decizii bazate exclusiv pe prelucrare automata care sa produca efecte juridice asupra ta. Rezultatele calculatorului de evaluare si ale Competition Benchmark sunt orientative si nu sunt astfel de decizii.

6. Cat timp pastram datele

- Mesaje, solicitari si date din formularele instrumentelor online care nu devin contract: pana la 3 ani de la ultima interactiune.
- Date de client si documente contractuale: pe durata contractului si inca 5 ani dupa incetarea lui (termenul general de prescriptie).
- Documente contabile si fiscale: pe durata prevazuta de Legea contabilitatii nr. 82/1991 si de Codul de procedura fiscala.
- Invitatii la evenimente pe baza de consimtamant: pana la retragerea consimtamantului.
- Identificatori pseudonimizati folositi pentru limitele de utilizare ale Competition Benchmark: cel mult 2 zile.
- Jurnale tehnice ale furnizorilor de gazduire: conform termenelor acestor furnizori. Nu exportam si nu pastram separat aceste jurnale.
- Cookie-uri: conform duratei afisate in bannerul de cookie-uri.

Daca nu putem sterge anumite date din cauza unei obligatii legale sau pentru constatarea, exercitarea ori apararea unui drept in instanta, le restrictionam si le folosim doar in acest scop.

7. Cui transmitem datele

Nu vindem datele tale. Le transmitem doar in masura necesara catre:

- Furnizori care prelucreaza date in numele nostru: Wix.com (website, formulare, statistici); Netlify (gazduirea calculatorului de evaluare si a Competition Benchmark, inclusiv serverul care furnizeaza datele la nivel de companie, contoarele pseudonimizate pentru limitele de utilizare si copia de siguranta a formularelor); Cloudflare (livrarea bibliotecilor tehnice ale instrumentelor prin cdnjs); Google (Google Workspace: e-mail, stocarea documentelor si Google Sheets pentru datele din formularele instrumentelor).
- Consultanti profesionali obligati la confidentialitate: contabil, avocat, auditor.
- Autoritati publice, atunci cand legea ne obliga.
- LinkedIn, pentru interactiunile pe care le ai cu noi pe aceasta platforma, conform propriei politici de confidentialitate a LinkedIn.

8. Transferuri in afara Spatiului Economic European

Unii furnizori (de exemplu Wix, Netlify, Cloudflare, Google, LinkedIn) pot prelucra date in afara SEE, inclusiv in Israel sau Statele Unite. In aceste cazuri, transferul se bazeaza pe o decizie de adecvare a Comisiei Europene (de exemplu pentru Israel sau pentru companiile din SUA certificate in cadrul EU-US Data Privacy Framework) sau pe clauze contractuale standard aprobate de Comisia Europeana.

9. Cookie-uri si stocare locala

Website-ul foloseste cookie-uri strict necesare pentru functionare si securitate. Cookie-urile de statistica si, daca este cazul, de marketing sunt folosite doar cu consimtamantul tau, exprimat prin bannerul de cookie-uri. Iti poti schimba optiunea oricand din bannerul de cookie-uri sau din setarile browserului.

Calculatorul de evaluare si Competition Benchmark nu folosesc cookie-uri de statistica sau de marketing. Competition Benchmark poate salva in browserul tau (localStorage) doar elementele tehnice descrise in sectiunea 3.3. Il poti sterge oricand din setarile browserului.

10. Securitatea datelor

Aplicam masuri tehnice si organizatorice rezonabile pentru protejarea datelor: conexiuni criptate (HTTPS), acces restrictionat, conturi protejate prin parola si autentificare in doi pasi, furnizori care respecta standarde de securitate recunoscute.

11. Drepturile tale

Ai dreptul:

- de acces la datele tale;
- la rectificarea datelor inexacte;
- la stergerea datelor („dreptul de a fi uitat”);
- la restrictionarea prelucrării;
- la portabilitatea datelor;
- de a te opune prelucrării bazate pe interes legitim, inclusiv comunicărilor de marketing;
- de a-ti retrage consimțământul oricand, fara a afecta legalitatea prelucrării anterioare.

Pentru exercitarea drepturilor scrie-ne la razvan.pop@flow-advisory.ro. Nu ai nevoie de un cont si exercitarea drepturilor este gratuita. Pentru a-ti proteja datele, iti putem cere informatii suplimentare, proportionale, pentru confirmarea identitatii. Raspundem in cel mult o luna. Cererile de stergere le analizam conform art. 17 GDPR; daca exista un temei legal pentru pastrare, restrictionam prelucrarea si iti explicam motivul.

Ai si dreptul de a depune o plangere la Autoritatea Nationala de Supraveghere a Prelucrării Datelor cu Caracter Personal (ANSPDCP), B-dul G-ral. Gheorghe Magheru nr. 28-30, Bucuresti, www.dataprotection.ro.

12. Modificari

Putem actualiza aceasta politica. Versiunea in vigoare este publicata intotdeauna pe www.flow-advisory.ro, cu data ultimei actualizari.

Ultima actualizare: 14 octombrie 2026

Privacy Policy

Effective date: 16 October 2026

This policy explains what personal data we process, why, on what legal basis, how long we keep it and what rights you have, in accordance with Regulation (EU) 2016/679 (GDPR) and applicable Romanian law.

1. Who we are

Flow Capital SRL, trading as Flow Advisory, is the controller of your personal data.

- Registered office: str. Dacia nr. 25, bl. U5, ap. 6, Oradea, Bihor County, Romania
- Tax ID (CUI): 43509475; Trade Register no.: J05/2407/2020
- E-mail: razvan.pop@flow-advisory.ro
- Phone: +31 630 952 995
- Website: www.flow-advisory.ro

We have not appointed a Data Protection Officer (DPO), as we are not legally required to. For any question about personal data you can write to us at the e-mail address above.

2. What data we process

We only process the data we need to communicate and work with you:

- Identification and contact data: first name, last name, e-mail, phone.
- Professional data: company, job title, professional contact details.
- Data entered in the forms of our online tools (for example the Competition Benchmark access form, when active): name, company, business e-mail, phone (optional) and stated interest.
- Billing data, only if you become a client: company name, address, tax ID, company bank account.
- The content of the messages you send us.
- Technical browsing data: IP address, browser and device type, pages visited, collected automatically through cookies and the technical logs of our hosting providers.

We do not collect special categories of data (for example health data) and we do not ask for your personal identification number or a copy of your ID.

3. Online tools

3.1 Valuation calculator

The financial data you enter in the valuation calculator on www.flow-advisory.ro (revenue, EBITDA, debt, cash, answers to the risk questions) is processed only in your browser. It is not sent to Flow Advisory and we do not store it. The provider hosting the calculator may, like any web server, record technical data such as the IP address in logs, for security and operation.

3.2 Competition Benchmark

Competition Benchmark shows financial indicators and estimates for companies in Romania. The data comes from public sources: the annual financial statements published by the Ministry of Finance and company identification data (name, tax ID, NACE/CAEN code, county) from public registers. Indicators such as EBITDA, NOPAT, invested capital, ROIC or working-capital days are our own indicative estimates.

This data concerns legal entities and, as a rule, is not personal data. The tool contains no data on directors, shareholders or beneficial owners, and no e-mail addresses or phone numbers of individuals.

If a company name includes the name of an individual, or you believe information in the tool relates to you personally, you can write to us at razvan.pop@flow-advisory.ro. We review the request within one month and, where appropriate, correct or restrict the display. The data remains available in the official public sources, which we do not control.

Aggregates (totals by sector, county and size) are computed in your browser. Company-level data (search, a company profile, rankings) is provided on request by the tool's server, hosted by Netlify. Your selections and filters are sent to the server only as needed to answer the request and are not linked to your identity.

To prevent automated extraction of the data, the server applies usage limits per IP address. The IP address is turned into a pseudonymised identifier (a hash with a secret key), linked only to the number of companies viewed, and is deleted automatically after at most 2 days. The legal basis is our legitimate interest in protecting the tool and its data (Art. 6(1)(f) GDPR).

The tool loads technical libraries (for PDF export) from cdnjs.cloudflare.com, operated by Cloudflare. Like any web server, these providers may record the IP address in logs, for security and operation.

3.3 Access and contact form in our tools

Where access to a tool requires completing a form, we process the data listed in section 2 to give you access, to respond to your stated interest and to contact you about services relevant to your company. The legal basis is our legitimate interest (Art. 6(1)(f) GDPR). You can object at any time.

Form data is sent through the tool's server (Netlify) to a Google Sheets table in our Google Workspace account. The server also keeps a backup copy of the form, stored with Netlify, with the same retention period. Your browser only stores two technical items (localStorage): a flag recording that you have already completed the form, so you do not have to complete it again, and a technical code, valid for 90 days, that gives you higher usage limits. They are not used for tracking.

4. Where we get the data from

- Directly from you: when you e-mail us, use the contact form, the forms of our online tools or LinkedIn, call us, attend an event or become a client.
- From public sources, in a professional context: for example your public LinkedIn profile or your company website.
- From official public sources, for the company data shown in Competition Benchmark: the Ministry of Finance and public company registers.
- Automatically, when you visit the website or our online tools (see section 9, Cookies).

5. Why we process the data and on what legal basis

- Responding to your requests (messages, requests for proposals, scheduling a call): our legitimate interest in responding to people who contact us, or steps prior to entering into a contract (Art. 6(1)(f) and (b) GDPR).
- Providing our online tools and access through the form: our legitimate interest in offering market analysis and responding to your stated interest (Art. 6(1)(f)).
- Providing our services and managing the contractual relationship: performance of the contract (Art. 6(1)(b)).
- Invoicing, accounting and tax obligations: legal obligation (Art. 6(1)(c)).
- Event invitations: your consent, which you can withdraw at any time (Art. 6(1)(a)).
- Professional communication and business development (for example LinkedIn messages to business people): our legitimate interest in promoting our services to professionals, within their reasonable expectations (Art. 6(1)(f)). You can object at any time.
- Website operation, security and statistics: legitimate interest (strictly necessary cookies) and your consent (statistics or marketing cookies).

Where we rely on legitimate interest, we have assessed that it does not override your rights and freedoms: we only process professional data, in a business-to-business context, to the extent you could reasonably expect, and you can exercise your right to object at any time. On request, we can provide information about this assessment.

Providing your data is voluntary. Without contact details we cannot reply to you, and without billing details we cannot enter into a contract.

We do not make decisions based solely on automated processing that produce legal effects concerning you. The results of the valuation calculator and of Competition Benchmark are indicative and are not such decisions.

6. How long we keep the data

- Messages, requests and online-tool form data that do not lead to a contract: up to 3 years after the last interaction.
- Client data and contractual documents: for the term of the contract and 5 years after it ends (general limitation period).
- Accounting and tax documents: for the period required by Accounting Law no. 82/1991 and the Fiscal Procedure Code.
- Event invitations based on consent: until consent is withdrawn.
- Pseudonymised identifiers used for Competition Benchmark usage limits: at most 2 days.
- Technical logs of hosting providers: according to those providers' retention periods. We do not export or separately keep these logs.
- Cookies: according to the duration shown in the cookie banner.

If we cannot delete certain data because of a legal obligation or for the establishment, exercise or defence of legal claims, we restrict it and use it only for that purpose.

7. Who we share the data with

We do not sell your data. We share it only as necessary with:

- Providers processing data on our behalf: Wix.com (website, forms, statistics); Netlify (hosting of the valuation calculator and Competition Benchmark, including the server that provides company-level data, the pseudonymised usage-limit counters and the backup copy of form submissions); Cloudflare (delivery of the tools' technical libraries via cdnjs); Google (Google Workspace: e-mail, document storage and Google Sheets for online-tool form data).
- Professional advisers bound by confidentiality: accountant, lawyer, auditor.
- Public authorities, where the law requires it.
- LinkedIn, for your interactions with us on that platform, under LinkedIn's own privacy policy.

8. Transfers outside the European Economic Area

Some providers (for example Wix, Netlify, Cloudflare, Google, LinkedIn) may process data outside the EEA, including in Israel or the United States. In such cases, the transfer is based on a European Commission adequacy decision (for example for Israel or for US companies certified under the EU-US Data Privacy Framework) or on standard contractual clauses approved by the European Commission.

9. Cookies and local storage

The website uses strictly necessary cookies for operation and security. Statistics and, where applicable, marketing cookies are used only with your consent, given through the cookie banner. You can change your choice at any time in the cookie banner or your browser settings.

The valuation calculator and Competition Benchmark do not use statistics or marketing cookies. Competition Benchmark may only store in your browser (localStorage) the technical items described in section 3.3. You can delete it at any time in your browser settings.

10. Data security

We apply reasonable technical and organisational measures to protect data: encrypted connections (HTTPS), restricted access, password-protected accounts with two-factor authentication, and providers that follow recognised security standards.

11. Your rights

You have the right:

- to access your data;
- to rectification of inaccurate data;
- to erasure (“right to be forgotten”);
- to restriction of processing;
- to data portability;
- to object to processing based on legitimate interest, including marketing communications;
- to withdraw your consent at any time, without affecting the lawfulness of prior processing.

To exercise your rights, write to us at razvan.pop@flow-advisory.ro. You do not need an account and exercising your rights is free of charge. To protect your data, we may ask for additional, proportionate information to confirm your identity. We reply within one month. We assess erasure requests under Art. 17 GDPR; where there is a legal basis for keeping the data, we restrict processing and explain why.

You also have the right to lodge a complaint with the Romanian National Supervisory Authority for Personal Data Processing (ANSPDCP), B-dul G-ral. Gheorghe Magheru nr. 28-30, Bucharest, www.dataprotection.ro.

12. Changes

We may update this policy. The version in force is always published on www.flow-advisory.ro, with the date of the latest update.

Last updated: 14 October 2026