

DPIA / AIPD Support Pack — FluxeHRa E-Sign only

Document type: lighter technical annex for the **E-Sign only** edition. **Version:** 2.0 — October 2026 **Not** a complete DPIA or legal advice.

Related: [DPA E-Sign only](#) · Trust Center · White paper · ISO pack · e-sign standards

No medical / health data. FluxeHRa does **not** process medical or occupational-health dossiers. Customers must **not** upload clinical records, medical certificates content intended as health data, or other data requiring French **HDS** (Hébergeur de Données de Santé) hosting. Standard EU hosting (Supabase Ireland / Vercel Dublin) applies; **HDS certification is not required** for this product scope and is **not** claimed.

1. Processing identification

Item	Value
Processing name	Operation of FluxeHRa E-Sign only for electronic signature of PDFs
Controller	[TO BE COMPLETED]
Processor	Foil Envie SAS (FluxeHRa) — contact@fluxehra.ai
Edition	product_edition = esign_only
DPA	DPA E-Sign only — [signature date]

2. Purposes

ID	Purpose
E1	Send PDF envelopes for signature (sequential/parallel)
E2	Authenticate signers (link + optional email OTP) + capture consent
E3	Stamp / seal PDF (SES visual + optional PAdES-B) and store signed copy
E4	Contestation evidence (certificate PDF / evidence.json)
E5	Reminders, expiry, void/resend, signed-copy download

In scope PDFs: any Customer PDF including **HR contracts** — as documents to sign, not as a Full HRIS.

Out of scope: Core HR master data, Performance, Learning, Compensation, payroll connectors, medical data.

Legal bases (controller): contract / legitimate interest for signature workflows — validate with counsel.

3. Data categories

Signer identity & email; PDF content; signature images; IP/UA; consent snapshot; hashes; optional PAdES thumbprint; audit events. **No medical data.**

4. Flow

```
[ Document Sender / Admin ]  
  → prepare/send envelope → email link /sign/[token]  
  → OTP? → consent → sign/decline  
  → complete (stamp + optional PAdES-B) → evidence + signed download
```

Hosting: same EU stack as Full HR (lighter feature surface).

5. Security (summary)

Hashed tokens/OTP; private `org/{orgId}/esign/...` paths; rate limits; consent snapshot; evidence pack; optional PAdES-B (`ETSI.CAdES.detached`); exclusivity with DocuSign per org.

6–8. Backups, retention, recipients

Platform backups; Controller sets envelope/document retention practice; recipients = signers + admins + Foil Envie support + Supabase/Vercel/Axiom (+ DocuSign if used).

9. Risks

Misdirected email link (OTP mitigates); PDF content sensitivity (Customer responsibility); self-signed PAdES identity untrusted in Adobe but detects post-seal changes; **no HDS** because no health data.

10. Checklist

- [] Confirm edition is E-Sign only (or upgrade path documented)
 - [] Confirm **no medical PDFs**
 - [] SMTP + signatories configured
 - [] Sign **DPA E-Sign only**
 - [] Archive evidence process for contested signatures
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11. Revisions

Ver	Date	Note
2.0	2026-10	Initial E-Sign only AIPD pack