

DPIA / AIPD Support Pack — FluxeHRa Full HR (+ E-Sign)

Document type: technical annex from the **processor** (Foil Envie SAS — FluxeHRa) for the **controller** (customer) — GDPR Art. 35 / French AIPD. **Edition:** Full HR **Version:** 2.0 — October 2026 **Not** a complete DPIA, legal advice, or certification.

Related: Trust Center /trust · Security white paper · ISO pack · [DPA Full HR](#) · [E-sign standards](#) (internal)

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 Full HR HRIS + e-signature for the organisation
Controller	[TO BE COMPLETED BY THE ORGANISATION]
Processor	Foil Envie SAS — 8 rue Sylvestre, 69100 Lyon, France — RCS Lyon 949 663 124 — SIRET 94966312400012 — VAT FR56949663124 — contact@fluxehra.ai
Service	https://fluxehra.ai — product_edition = full
Applicable DPA	DPA Full HR — [signature date]

2. Purposes (typical)

ID	Purpose	Modules
F1	Employee master data / employment admin	Core HR
F2	Compensation / payroll-oriented exports	Compensation, API/SFTP
F3	Performance	Performance Management
F4	Learning / SCORM	Learning

ID	Purpose	Modules
F5	HR documents + e-signature	DMS; Fluxehra e-signature (eIDAS SES + optional PAdES-B) and/or DocuSign
F6	Self-service & notifications	Self-service
F7	Analytics	Analytics
F8	Talent / recruitment (if enabled)	Talent Pool / Recruitment
F9	DSAR & retention tooling	DSAR, Retention

Modules enabled: [TO BE COMPLETED]

Legal bases: employment contract / legal HR obligations / legitimate interest as applicable — **no Art. 9 medical processing** in product scope.

3. Data subjects & categories

Employees, managers, admins, candidates (EDR), signers. Categories: identity, employment, compensation, performance/learning, documents/PDFs, e-sign metadata, audit logs. **Excluded:** medical / health data; HDS-scoped dossiers.

4. Data-flow schematic

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[ HR / Manager / Employee / Admin ]
  → FluxeHRa (Vercel dub1) → Supabase eu-west-1 (RLS + private Storage)
  → optional SMTP / IdP / SFTP
  → Fluxehra e-signature (/sign) or DocuSign
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5. Security matrix

RBAC, TLS, field encryption, private Storage, audit, MFA for privileged roles, e-sign hashed tokens + evidence pack + optional PAdES-B. Verify via white paper & Org Setup.

6–8. Backups, retention, recipients

Supabase backups; Customer configures retention; recipients = authorised users + Foil Envie support + platform sub-processors + customer integrations.

9. Residual risks

Risk	Reduced by platform	Customer
Cross-tenant	RLS	Account hygiene
Over-retention	Purge tools	Lawful periods
Medical data in PDF	Product policy forbids health dossiers	Do not upload medical content

10. Checklist

- ☐ DPO involved; DPIA necessity confirmed
- ☐ Modules listed; placeholders completed
- ☐ Confirm **no medical data** will be stored
- ☐ Sign **DPA Full HR**; archive sub-processors
- ☐ Configure visibility & retention
- ☐ Attach white paper + this annex

11. Revisions

Ver	Date	Note
2.0	2026-10	Dual edition; remove medical/HDS product scope
1.x	2026-07/09	Prior generic annex