Lufran Solutions

Privacy policy

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This website has no forms, cookies, analytics or third-party content. Here we explain which data is processed anyway and what rights you have under Andorran Qualified Law 29/2021 of 28 October on the protection of personal data (Llei 29/2021).

Controller

Lucas Ezequiel Palma (Lufran Solutions), Andorra. Contact: privacy@lufransolutions.com.

What data we process and why

When you visit. Cloudflare, our hosting provider, receives the technical data every browser sends (IP address, date and time, requested page and browser type) to serve the website and protect it from attacks. We don't use this data to identify you or to count visits, and we keep no visit logs.

If you write to us. If you email support@lufransolutions.com or privacy@lufransolutions.com, we process your email address, your name if you give it and the content of your message, only to reply to you. Please don't include special-category data or attachments unless strictly necessary.

Confirmation of receipt. When you write to support@lufransolutions.com or privacy@lufransolutions.com you receive an automatic reply confirming that your message arrived. To decide whether to send it, a Cloudflare service (Email Routing and a Worker) reads a copy of the message at that moment; the text is not stored. What does remain is the Email Routing activity log, with the date and time, the sender, the recipient, the subject, the message identifier and the result of its authenticity and spam checks for each copy: Cloudflare keeps it for 31 days and we only consult it from our account, to check that the confirmation works or to investigate abuse.

The Worker prepares the reply, with nothing from your message, and Supabase (servers in Frankfurt, in the European Union) hands it to Google Workspace's sending service, which sends it from the address you wrote to. No copy is kept in any mailbox. Every new email gets its confirmation; replies within the same conversation do not.

So that no one can use these addresses to send emails to third parties, at most one confirmation is sent per message and ten an hour to the same person, with an overall hourly limit. For this, three counters with pseudonymous references (HMAC), never email addresses, are kept in a Cloudflare database in the European Union and deleted after 8 days.

Legal basis

Serving and protecting the website: our legitimate interest in keeping it available and secure.

Replying to your messages: our legitimate interest in answering your questions or, if you ask about our apps, taking steps at your request before any possible agreement.

Sending the receipt confirmation and checking that it works: our legitimate interest in confirming to whoever writes that their message arrived without letting anyone use the confirmation to write to third parties.

Keeping a blocked copy of what we delete: the legal obligation under Article 30 of Llei 29/2021.

Retention

We delete each email conversation at the first monthly review after 12 months have passed since your last message, unless a legal obligation requires keeping it longer or you ask us to delete it sooner.

When we delete it, Andorran law requires us to block it: we keep an encrypted copy, outside the mailbox, that can only be made available to the courts, the Public Prosecutor's Office, the competent public authorities or the APDA. As a general rule, we destroy it after 36 months; a claim or proceeding can change that period.

Cloudflare processes technical visit data under its data processing agreement, only for the purposes above.

The receipt-confirmation counters (pseudonymous references, no addresses) are deleted after 8 days, and the Email Routing activity log, without the text of the messages, after 31.

Recipients

Cloudflare, Inc., which hosts and protects the website and, through Email Routing and a Worker, decides whether to send the receipt confirmation and keeps the activity log of those copies, as a processor.

Google Cloud EMEA Limited (Ireland), through Google Workspace, which hosts the support@lufransolutions.com and privacy@lufransolutions.com mailboxes and sends the receipt confirmation, as a processor.

Supabase Pte. Ltd. (Singapore), which hands the receipt confirmation to Google's sending service from servers located mainly in the European Union (Frankfurt), without storing the email, as a processor.

We never sell or share your data. We would only disclose it to an authority if the law required us to.

International transfers

Cloudflare, Google and Supabase may process this data outside Andorra, including in the United States, with the safeguards set out in their data processing agreements, such as standard contractual clauses.

Their lists of subprocessors: Cloudflare, Google and Supabase.

Your rights

You can ask for access to, rectification or erasure of your data, restrict or object to its processing, or request its portability by writing to privacy@lufransolutions.com. We'll reply within a week at the latest.

If you believe we have mishandled your data, you can lodge a complaint with the Andorran Data Protection Agency (Agència Andorrana de Protecció de Dades, APDA) at apda.ad and, where applicable, with the data protection authority in your country.

Cookies and storage

This website uses no cookies and stores nothing on your device. It also uses no analytics, advertising, external fonts or third-party videos or maps.

The checks on the home page (cookies, connections to other companies and your settings) run in your browser, using only what it already knows about this page and your settings: nothing is stored or sent to anyone.

Automated decisions

We make no automated decisions and build no profiles with your data.

Changes

If we change anything important, we'll publish it here with a new update date.