

# Formata

## Country Annex — United Kingdom

Vendor statement of facts relevant to local requirements

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## About this document

This annex supplements the documentation of Formata version 1.6.0 for customers in the United Kingdom. It sets out the facts about the product that matter under the local rules named below and shows which obligations stay with the customer.

The annex is a statement by the vendor about its product. It is not legal advice, not a certificate of conformity and not a substitute for the customer's own assessment.

## 1. Purpose and status

No certification under United Kingdom schemes (including Cyber Essentials) and no registration with United Kingdom authorities is claimed for the product or for the vendor in this document.

## 2. Product facts

| Item                               | Fact                                                                                                                                                                                                                                                                                                                             |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Product and version                | Formata 1.6.0                                                                                                                                                                                                                                                                                                                    |
| Deployment                         | Server software installed on the customer's infrastructure                                                                                                                                                                                                                                                                       |
| Customer content on vendor servers | No                                                                                                                                                                                                                                                                                                                               |
| Interface languages                | Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only. |

### 2.1. Personal data the product can process

- User accounts: login, name, roles, department, password hash, active flag
- Customer contact persons and leads: last name, first name, position, company, email address, phone, notes
- Organisational structure data: positions, assignments, managers, delegations
- Correspondence: messages of connected mailboxes with attachments, messages of the internal messenger
- Details of counterparties in warehouse documents
- Log records: who signed in and when, who opened and saved forms, who changed field values
- Any other information the customer enters in note fields, attachments and its own forms

### 2.2. Where data is stored

All data is stored in the PostgreSQL database on the customer's server. Attachments are stored in a directory on the server disk (by default `uploads` in the service working directory); mail attachments are stored in the database. The user's browser keeps the access token (until the tab is closed), the queue of unsaved actions made while offline and a cache of the shell files.

### 2.3. Data sent to the vendor

None.

## 3. Data protection — UK GDPR

The UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, apply to the personal data the customer processes with the product. The supervisory authority is the Information Commissioner's Office (ICO).

### 3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the controller. The vendor has no access to that data and is not a processor for it.

Details of the vendor's establishment and, where Article 27 UK GDPR applies, of its United Kingdom representative are stated in the contract.

### 3.2. What the product provides

- **Access control.** Sign-in with a login and password; the server issues a random token that the browser sends in the `Authorization: Bearer` header. After five failed attempts within 15 minutes sign-in for that login is blocked for 10 minutes (configurable). The password of a domain account can be checked by an external identity provider over OpenID Connect. There is no multi-factor authentication. Access control: user roles, a role-to-forms matrix, permissions on individual form controls and table fields, record visibility by owner and organisational structure, sharing of a single record, roles on named queries. External systems use API keys with scopes and a request-rate limit.
- **Logging.** The `sys_audit` database table: sign-in attempts (successful, failed, locked), opening and saving of forms, script runs and errors, access denials, form publication, report exports. The `sys_record_history` table: the old and new value of every changed field for tables placed under observation (by default warehouse documents, their lines, products, warehouses and counterparties). Separate logs are kept for integration API calls, scheduler job runs, background tasks, slow queries and configuration transfers. Service messages go to the system journal (`journald`). The program sets no retention period for the action log.
- **Export and deletion.** Export: results of named queries and data components as CSV (by a button in the forms that provide one and by a request to the server), records as JSON through the integration API, a full export with standard PostgreSQL tools (`pg_dump`). Deletion: individual records in forms, through the API or by the administrator's SQL queries; attachments are marked deleted and the file is erased once nothing references it; all data by dropping the database and removing the attachment directory. The program has no ready-made procedure for anonymising or erasing all information about one person.
- **Encryption.** See the section on cryptography below.

### 3.3. What remains with the customer

- the lawful basis for processing and privacy information to individuals;
- records of processing and, where required, a data protection impact assessment;
- answering individuals' requests with the export and deletion functions above;
- reporting a personal-data breach to the ICO within 72 hours where the law requires it.

## 4. Supplier security

Central-government buyers require suppliers to hold Cyber Essentials certification for many contracts, and assess cloud services against the NCSC Cloud Security Principles. The facts needed for a supplier assessment are in the Security and Data Protection Statement. No Cyber Essentials certificate is claimed in this document.

## 5. Accessibility

Public-sector bodies must meet the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, which point to WCAG 2.2 Level AA; all buyers are subject to the Equality Act 2010.

Status of the product: No accessibility assessment (WCAG or similar) has been carried out. The interface runs in a browser, scales with browser zoom and supports right-to-left layout for Arabic and Persian; some operations (dragging cards on the board, working in the designer) are designed for a mouse.

No WCAG conformance report is provided for this version.

## 6. Use of artificial intelligence

The product uses large language models as follows. Lead scoring. If the administrator has configured a key for an external artificial-intelligence service, a scheduler job sends that service the fields of unscored leads every 15 minutes (title, company, contact person, e-mail address, telephone, source, budget) and stores the returned score in the lead record. If no key is configured, the score is computed on the customer's server by built-in rules and nothing is sent to an external service.

The United Kingdom has no statute specific to artificial intelligence in commercial software. Where personal data is involved, the UK GDPR rules on automated decision-making and on international transfers apply to the customer's use of these functions. The output of these functions is to be reviewed by a person before it is relied on.

## 7. Accounting records and tax

The product keeps business records. Under Making Tax Digital, VAT-registered businesses keep digital records and file through software recognised by HMRC. The product has not been submitted for HMRC recognition, and no United Kingdom-specific tax functions are claimed for this version.

## 8. Language

This package is supplied in English. English is the language of contracts and documentation in the United Kingdom; no further language version is needed.

Interface languages of the product: Shell: English, Russian, German, Spanish, French, Italian, Polish, Portuguese (Brazil), Turkish, Japanese, Korean, Chinese, Arabic and Persian (the last two right-to-left). CRM form labels are kept in a translation dictionary in the same languages; some strings produced by queries and scripts are shown in Russian only.

## 9. Documents usually requested and where to find them

| Usually requested                                            | Where it is                                                           |
|--------------------------------------------------------------|-----------------------------------------------------------------------|
| Product description, functional specification                | Product Description and Functional Specification                      |
| Installation and operating instructions                      | Installation and Administration Guide                                 |
| User manual                                                  | User Guide                                                            |
| Maintenance and support description                          | Software Lifecycle, Maintenance and Support. Service levels: contract |
| List of third-party and open-source components               | Delivery Specification and Third-Party Components                     |
| Security and data-protection description                     | Security and Data Protection Statement                                |
| Processing contract (Article 28 UK GDPR), transfer agreement | Contract; needed only where the vendor processes customer data        |
| Cyber Essentials certificate                                 | Not claimed                                                           |
| WCAG 2.2 accessibility statement                             | Not provided for this version                                         |
| Licence agreement, warranties, prices                        | Contract                                                              |

## Document history

| Document version | Date       | Product version | Change      |
|------------------|------------|-----------------|-------------|
| 1.0              | 2026-10-06 | 1.6.0           | First issue |