

Formata

Country Annex — United States

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 States. 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, authorisation or registration by United States federal or state 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. Privacy

The United States has no single federal privacy statute for the private sector. Contracts most often refer to the state consumer-privacy laws, above all the California Consumer Privacy Act as amended by the CPRA (Cal. Civ. Code § 1798.100 et seq.), and to sector laws.

3.1. Roles

For personal data processed in the product on the customer's own equipment, the customer is the business (the CCPA term; "controller" in other state laws). The vendor has no access to that data and is not a service provider for it.

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 notice at collection and the privacy policy;
- answering consumer requests to know, delete and correct, using the export and deletion functions above;
- deciding whether regulated categories of data may be placed in the product. No assessment of the product against HIPAA, GLBA, FERPA, COPPA or PCI DSS is claimed in this document.

4. Accessibility

Federal agencies, and many state bodies and universities, buy information technology against Section 508 of the Rehabilitation Act (29 U.S.C. § 794d), whose standards incorporate WCAG 2.0 Level AA, and ask the vendor for an Accessibility Conformance Report on the VPAT template.

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 Accessibility Conformance Report (VPAT) is provided for this version.

5. Software supply chain

Federal agencies set their own software-assurance requirements (OMB Memorandum M-26-05). An agency may ask a software producer for a statement on secure development practices aligned with the NIST Secure Software Development Framework (NIST SP 800-218) and for a software bill of materials (SBOM).

- Development and release practices are described in "Software Lifecycle, Maintenance and Support".
- Third-party components and their licences are listed in "Delivery Specification and Third-Party Components". The list is human-readable; no SBOM in SPDX or CycloneDX format is provided for this version.
- No secure-development attestation is provided for this version.

6. Cryptography and export controls

The product uses cryptography as follows:

- User passwords are stored as bcrypt hashes (pgcrypto extension, cost factor 10). A password written in clear text (initial data, the user card in the CRM application) is replaced by a hash at that user's first successful sign-in
- Integration API keys are stored only as a SHA-256 hash
- Outbound webhooks of the core are signed with HMAC-SHA256 (the `X-Formata-Signature` header)
- Attachments are addressed by the SHA-256 hash of their content (deduplication, ETag header); this is integrity control, not encryption
- The server accepts requests over plain HTTP; TLS is provided by the customer's reverse proxy. Outbound script connections to mail servers (IMAP, SMTP) and to the external AI service use TLS through Python
- The program does not encrypt data at rest: database content, attachments and the passwords of connected mailboxes are stored unencrypted and are protected by operating-system and database means
- The product has not been validated under FIPS 140-3. Where the list above names cryptographic services of the operating system, their validation status is that of the operating system.
- The product is developed and published outside the United States. No U.S. export classification (ECCN) is claimed for it. A customer that exports or re-exports the product from the United States determines its own obligations under the Export Administration Regulations (15 C.F.R. Parts 730–774).

7. 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.

There is no federal statute on artificial intelligence in commercial software. State laws are developing and mainly address automated decisions with significant effects on individuals; whether the customer's use of these functions falls under them depends on that use. The output of these functions is to be reviewed by a person before it is relied on.

8. Records and taxes

The United States has no certification regime for cash-register or accounting software. No U.S.-specific tax content (sales-tax rates, tax forms, payroll) is claimed for this version. Keeping records for the periods required by federal and state tax rules is the customer's task; backup is described in the Installation and Administration Guide.

9. Government contracts

- **Rights in software.** The software and its documentation are "commercial computer software" and "commercial computer software documentation" within the meaning of Part 12 of the Federal Acquisition Regulation and DFARS 227.7202. U.S. Government end users acquire them with only the rights set out in the vendor's licence agreement.
- **Country of origin.** A statement for the purposes of the Trade Agreements Act (19 U.S.C. § 2501 et seq.; FAR 52.225-5) depends on the contracting entity and is given in the contract; none is made here.
- **Cloud authorisation.** No FedRAMP authorisation is claimed for the vendor-hosted option.

10. Language

This package is supplied in English. This annex is laid out for US Letter paper; the other documents of the package are laid out for A4.

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.

11. Documents usually requested and where to find them

Usually requested	Where it is
Product description, functional specification	Product Description and Functional Specification

Usually requested	Where it is
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
Accessibility Conformance Report (VPAT)	Not provided for this version
SBOM (SPDX or CycloneDX), secure-development attestation	Not provided for this version; component list as above
Service-provider terms (CCPA), business associate agreement (HIPAA)	Contract, where applicable
Licence agreement, warranties, prices	Contract

Document history

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