

Privacy Policy

Document	Azulkey Privacy Policy
Version	1.9
Effective	07 May 2026
Operated by	Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta
Processor role	Estefania Sanchez Martin (trading as Azulkey) acts as Data Processor on behalf of its Agency clients
Jurisdiction	Malta / European Union (GDPR)

1. Introduction

Azulkey is a trading name of Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta ('we', 'us', 'our'). Azulkey provides a real estate CRM platform that enables real estate agencies and independent agents to manage leads, property listings, owner relationships and client communications. The platform currently supports Facebook Messenger, Instagram, and email (outbound and inbound transactional messaging) as communication channels. Additional channels may be integrated in future updates, and this policy will be updated before any materially different new channel goes live.

Azulkey serves four distinct user roles: Super Admin (platform operator), Agency Owner (manages a team of agents), Agency Agent (member of an agency team), and Solo Agent (an independent agent operating without an agency, who functions as an agency of one with full responsibility for their own data).

This Privacy Policy explains how we collect, use, store and protect personal data when you use the Azulkey platform, and sets out the rights of data subjects under the General Data Protection Regulation (EU) 2016/679 ('GDPR') and the Malta Data Protection Act (Chapter 586 of the Laws of Malta).

By accessing or using the Azulkey platform, you acknowledge that you have read and understood this policy.

2. Data Controller and Processor Roles

The roles under GDPR are allocated as follows:

Agency (your client)	Data Controller — an agency business that determines the purposes and means of processing personal data of leads and property owners.
Solo Agent	Data Controller — an independent agent operating without an agency who is solely responsible for the personal data they process through Azulkey. A Solo Agent has the same GDPR obligations as an Agency.

Estefania Sanchez Martin (trading as Azulkey)	Data Processor — processes personal data solely on documented instructions from the Agency or Solo Agent, as set out in our Data Processing Agreement (DPA).
Meta Platforms Inc.	Independent Data Controller — when leads interact via Facebook Messenger or Instagram, Meta processes data under its own Privacy Policy and Terms of Service.

Both Agencies and Solo Agents using Azulkey remain independently responsible for ensuring they have a lawful basis to collect and process lead and owner data, including obtaining valid GDPR consent where required.

Each user role has access only to the data necessary for their function, enforced through role-based access controls at the database layer (Row-Level Security). This ensures agents cannot access data outside their own agency, and Solo Agents can only access their own records.

3. What Personal Data We Collect

3.1 Lead Data (collected on behalf of Agencies)

- Full name, phone number, email address
- Communication channel (Facebook Messenger, Instagram, or email)
- Message content and conversation history
- Property intent (buy or rent), budget range, preferred locations
- Pipeline stage and notes added by agents
- Consent status and timestamps

As new messaging channels are added to the platform in future, this section will be updated to reflect the additional data collected.

3.2 Property Owner Data

- Full name, phone number, email address
- Property details: type, location, price, status
- Consent status and notes

3.3 Platform User Data (Agents and Agency Owners)

- Full name and professional email address
- Role within the platform: Agency Owner, Agency Agent, or Solo Agent
- Agency association (where applicable — Solo Agents have no agency_id)
- Login credentials (passwords are hashed and never stored in plain text)
- Subscription plan and billing status
- Usage logs and audit trail entries

3.4 Third-Party Platform Data (Meta)

When an Agency connects a Facebook Page or Instagram Professional Account to Azulkey, we access the following data via the Meta Graph API solely to deliver the messaging features requested by the Agency:

- Facebook Page ID and Page name
- Instagram Business Account ID
- Inbound message content and sender identifiers (PSID / IGSID)
- Message timestamps and delivery receipts

We do **not** collect, store or process: personal Facebook profiles of end users, friend lists, private photos, ad account data, or any data beyond what is strictly necessary to route and display messages within Azulkey.

4. Lawful Basis for Processing

Contractual necessity	Processing required to deliver the services described in our Terms of Service to Agencies.
Legitimate interests	Security monitoring, fraud prevention, platform analytics (aggregated and anonymised).
Legal obligation	Compliance with GDPR, Malta DPA, and applicable tax and accounting regulations.
Consent (lead/owner)	Agencies are required under our Terms to obtain and record valid consent from leads and property owners before processing their data through Azulkey.

5. How We Use Personal Data

- To operate, maintain and improve the Azulkey CRM platform
- To route and display inbound and outbound messages across connected channels
- To provide pipeline management, reporting and analytics features to Agencies
- To generate automated reference numbers, audit logs, and GDPR compliance records
- To send transactional emails (account setup, billing, security alerts)
- To comply with legal obligations including data subject access requests and erasure requests

We do **not** sell personal data to any third party under any circumstances. We do not use personal data — including data obtained via Meta platforms such as Facebook Messenger and Instagram — for advertising, profiling, re-targeting, or any marketing purpose outside the services explicitly requested by the Agency. We do not use identifiable lead or owner data to train AI models.

6. Facebook and Instagram Data

Azulkey integrates with the Meta Graph API to provide messaging and lead capture functionality via Facebook Messenger and Instagram. Users of Azulkey must comply with Meta Platforms' Terms, Platform Terms, Developer Policies, Community Standards, and any other applicable Meta policies at all times when using Azulkey's Meta

integrations. The following specific commitments apply to all Meta-sourced data:

6.1 Data Access

We access Facebook and Instagram data only through permissions explicitly granted by the Agency during the OAuth connection process. Current permissions used are limited to messaging and lead retrieval. We do not access user profile data, advertising data, or content beyond what is required for the connected features.

6.2 Data Use Restrictions

Azulkey explicitly commits that data obtained via Meta platforms (Facebook Messenger and Instagram) is:

- Used solely to provide the messaging and lead management features within Azulkey, as requested by the Agency
- **Never sold** to any third party under any circumstances
- **Never used** for advertising, profiling, re-targeting, or cross-context behavioural advertising
- **Never transferred** to third-party advertising networks or data brokers
- **Never used** to build advertising audiences or lookalike audiences
- **Never used** to train AI models with identifiable personal data

6.3 Data Deletion Requests from Meta

In accordance with Meta's Platform Terms and Developer Policies, Azulkey supports automated data deletion callbacks. When Meta sends a deletion request for a specific user's data, our system will:

- Receive the request at our secure deletion callback endpoint
- Delete all associated messages and personal identifiers from our database
- Retain only anonymised audit log entries as required by law
- Return a confirmation URL to Meta within 72 hours

Users may also request deletion directly via email to privacy@azulkey.com — see Section 9 for full data subject rights.

7. Data Retention

Active lead/owner data	Retained for the duration of the Agency's or Solo Agent's subscription plus 90 days post-termination.
24-month inactivity	Leads and owners with no activity for 24 months are automatically flagged for review and the Agency Owner or Solo Agent is notified.
36-month inactivity	Leads and owners with no activity for 36 months are automatically deleted or anonymised (depending on system configuration): personal identifiers are removed and a GDPR audit log entry is created with event type 'auto_deletion_36mo'. The reference number and pipeline record are retained.
Messages	Deleted as part of the lead deletion or anonymisation process at 36 months, or immediately upon a valid erasure request.

GDPR audit logs	Retained for 7 years as required by applicable law. Logs contain only anonymised reference identifiers, not personal data.
Billing records	Retained for 7 years in accordance with Maltese accounting regulations.

8. Data Sharing and Subprocessors

We share personal data only with vetted subprocessors under binding data processing agreements. Our current subprocessors are:

Supabase Inc.	Database hosting and authentication. Data hosted in EU region (Frankfurt). DPA in place.
Stripe Inc.	Payment processing. Billing data only. PCI-DSS compliant.
Meta Platforms Inc.	API integration for Facebook Messenger and Instagram messaging. Data subject to Meta's Data Policy.
Anthropic PBC	AI content generation features (anonymised data only, no lead PII transmitted).

We do not sell, rent or trade personal data with any third party. We may disclose data to law enforcement or regulatory authorities where required by law. This subprocessor list will be updated before any new third-party integration goes live.

9. Your Rights as a Data Subject

Under GDPR, individuals whose data is processed through Azulkey have the following rights. The correct contact for exercising these rights depends on who collected your data:

- If your data was collected by an **Agency** — contact that Agency directly as the Data Controller. Azulkey will assist the Agency in fulfilling the request.
- If your data was collected by a **Solo Agent** — contact that agent directly, or email privacy@azulkey.com and we will forward your request to the relevant agent.
- If you are a **platform user** (agent or agency owner) — submit your request via the Azulkey account settings or email privacy@azulkey.com.

Right of access	Request a copy of personal data held about you.
Right to rectification	Request correction of inaccurate or incomplete data.
Right to erasure	Request deletion of your personal data ('right to be forgotten').
Right to restriction	Request that processing is restricted while a dispute is resolved.
Right to portability	Receive your data in a structured, machine-readable format.
Right to object	Object to processing based on legitimate interests.

Right to withdraw consent

Withdraw consent at any time without affecting prior processing.

We will acknowledge all requests within 5 business days and fulfil them within 30 days. Where a request is directed to a Controller (Agency or Solo Agent), Azulkey will provide technical assistance to ensure the request is completed within that timeframe.

10. Security

- All data is encrypted in transit using TLS 1.2 or higher
- Database data is encrypted at rest using AES-256
- Access to production data is restricted to authorised personnel only, under least-privilege principles
- Role-based access controls enforced at the database layer (Row-Level Security) — each user role has access only to the data necessary for their function
- Security events are logged and reviewed regularly
- In the event of a personal data breach, affected parties will be notified within 48 hours as required by GDPR Article 33

11. International Transfers

Azulkey stores all personal data within the European Union. Where any data is transferred outside the EU (for example, to Stripe for payment processing), we ensure appropriate safeguards are in place including Standard Contractual Clauses (SCCs) approved by the European Commission.

12. Children's Data

Azulkey is a business-to-business platform intended for use by real estate professionals. We do not knowingly collect or process personal data of individuals under the age of 16. If we become aware that a child's data has been submitted, we will delete it promptly.

13. Complaints

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the Malta Information and Data Protection Commissioner (IDPC) at www.idpc.org.mt, or with the supervisory authority in your EU member state of residence.

14. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated to Agency Owners and Solo Agents via email at least 30 days before they take effect. The current version is always available at azulkey.com/privacy.

15. Contact

Legal name	Estefania Sanchez Martin, trading as Azulkey, a self-employed individual registered in Malta
Data Protection contact	privacy@azulkey.com
Postal address	Malta
Website	www.azulkey.com