

Privacy Policy

Effective Date: 05/11/2026

1. Introduction

Filot (“we,” “us,” or “our”) provides a secure document storage and transfer platform and related services (the “Services”) designed to help organizations, including those operating in regulated industries, exchange and manage sensitive documents. This Privacy Policy explains how we collect, use, disclose, store, and protect information when you access or use the Services, whether as a subscribing customer user or as an external portal user who registers an account to exchange documents with a subscribing customer. By using the Services, you acknowledge and agree to the practices described in this Privacy Policy.

2. Information We Collect

We collect information that is necessary to operate the Services, maintain security, and provide support. We do not access, view, review, or monitor the contents of user-uploaded documents.

The information we collect may include account and contact information, such as your name, email address, and other information you choose to provide when creating or managing an account. We also collect authentication and security information, such as encrypted credentials, multi-factor authentication status (if enabled), IP addresses, login timestamps, device and browser information, and security logs. We collect usage and activity information, such as logs reflecting interactions with the Services (for example, access events, sharing events, and system actions), which may be associated with an account or device. We may also collect communications information when you contact us, such as the content of messages you send to support.

External portal users should understand that when they use the Services to exchange documents with a subscribing customer, information and activity associated with that exchange (including account identifiers, access events, and the documents exchanged) will be visible to the applicable subscribing customer and its authorized users as part of the normal operation of the portal.

3. How We Use Your Information

We use the information we collect to provide and secure the Services. This includes authenticating users, enabling account access, and operating core functionality such as document routing, storage, and retrieval. We use security and access data to help prevent

unauthorized access, detect suspicious activity, and protect the integrity of the Services. We use usage and activity information to maintain service reliability, troubleshoot issues, support customers and users, and improve performance. We may use aggregated or de-identified information to understand how the Services are used and to improve the Services, but we do not use your information for targeted advertising, profiling, or selling personal information to third parties.

3a. Lawful Basis for Processing (GDPR)

Where the General Data Protection Regulation (GDPR) or UK GDPR applies, we rely on the following lawful bases for processing your personal data:

Processing Purpose	Lawful Basis
Providing and improving the platform	Performance of a contract
Responding to inquiries and support requests	Performance of a contract / Legitimate interests
Delivering demos, content, and product updates	Legitimate interests
Personalising your website experience	Legitimate interests
Running marketing and retargeted ad campaigns	Consent
Measuring campaign performance	Legitimate interests
Complying with legal obligations	Legal obligation
Using cookies and tracking technologies (non-essential)	Consent

Where we rely on consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal. To withdraw consent, contact us at contact@filot.io.

3b. Your Rights Under GDPR and UK GDPR

If you are located in the European Union or United Kingdom, you have the following rights in relation to your personal data:

- **Right of Access:** You may request a copy of the personal data we hold about you and information about how we process it.
- **Right to Rectification:** You may request that we correct inaccurate or incomplete personal data.

- **Right to Erasure:** You may request that we delete your personal data where it is no longer necessary for the purposes for which it was collected, or where you have withdrawn consent and no other lawful basis applies.
- **Right to Restriction:** You may request that we restrict processing of your personal data in certain circumstances, such as while we assess a rectification request.
- **Right to Data Portability:** Where processing is based on consent or contract, you may request that we provide your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** You may object to processing based on legitimate interests at any time. We will stop processing unless we can demonstrate compelling legitimate grounds that override your interests or the processing is necessary for legal claims.
- **Right to Withdraw Consent:** Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with your local supervisory authority:
 - **EU residents:** Your national data protection authority (a full list is available at edpb.europa.eu)
 - **UK residents:** The Information Commissioner's Office (ICO) at ico.org.uk

To exercise any of these rights, contact us at **contact@filot.io**. We may need to verify your identity before responding. We will respond within 30 days, or notify you if an extension is required under applicable law.

4. Data Sharing and Disclosure

We do not sell or rent personal information. We disclose information only as described below.

We disclose information to subscribing customers and their authorized users in order to provide the Services. For example, when an external portal user exchanges documents with a subscribing customer, the subscribing customer will be able to access the documents exchanged with that customer and the related account and activity information needed to use and administer the portal.

We disclose information to service providers that help us operate the Services, such as cloud infrastructure providers (including Amazon Web Services (AWS)) and security/compliance tooling providers. These service providers are contractually required to protect information and to use it only to provide services to us. We do not authorize service providers to use information for their own marketing purposes.

We may disclose information if we believe disclosure is necessary to comply with applicable law or legal process, enforce our agreements or policies, protect the security or integrity of the Services, or protect the rights, property, or safety of Filot, our customers, users, or others. We may also disclose information in connection with a corporate transaction such as a merger,

acquisition, financing, reorganization, or sale of assets, in which case information may be transferred as part of that transaction subject to appropriate confidentiality protections.

International Data Transfers

Filot uses third-party service providers, including Amazon Web Services (AWS) and HubSpot, that may process personal data outside the European Economic Area (EEA) or United Kingdom. Where such transfers occur, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission, or equivalent transfer mechanisms under UK law. For more information on the safeguards applicable to your data, contact us at contact@filot.io.

5. Data Storage and Security

We store and process information using AWS infrastructure and apply security measures designed to protect information, including encryption in transit and at rest and access controls. We maintain security logs to support monitoring and auditing. No system can guarantee absolute security, and you use the Services at your own risk. If you believe your account has been compromised, you should notify us promptly.

6. User Responsibilities and Content

You are responsible for the legality, accuracy, and integrity of information and documents you upload, transmit, or share through the Services and for ensuring your use of the Services complies with applicable law. Filot does not validate or verify the contents of documents uploaded to the Services and does not access, view, review, or monitor document contents.

7. Cookies and Tracking Technologies

Filot uses cookies, pixels, and similar tracking technologies to analyse website usage, improve user experience, deliver personalised ads, and measure ad performance.

HubSpot Website Tracking

Filot uses HubSpot, a customer relationship management platform, to track website visitor behaviour and collect analytics data. HubSpot's tracking code sets browser cookies when visitors land on our site. First-party cookies set by HubSpot are stored by our domain, and information collected does not leave our website.

What Data We Collect

Through HubSpot tracking, we collect the following:

- Visitor Identification (VID): A unique identifier created when an unidentified visitor interacts with our site
- Visited Pages: Full page paths viewed by visitors, used to provide targeted page-based visit and intent insights
- IP Address: Used to identify which companies are visiting our website
- Timestamps: Date and time of webpage views for analytics accuracy
- Form Data: When you voluntarily submit a form, we associate your prior page views with your contact information

Cookie Consent and Categories

Filot uses an opt-in consent model for non-essential cookies. Under GDPR and UK GDPR, non-essential cookies (including advertising and analytics cookies) require your explicit consent before being set. We obtain this consent through a cookie consent banner displayed on your first visit.

If you accept our consent banner, we track your activity using the cookie settings configured in our account. If you decline, non-essential cookies will not be set.

HubSpot sets cookies in two categories:

Essential/necessary cookies, which do not require consent and are always active

Non-essential cookies, controlled by the consent banner

Essential cookies that are always set include:

- `__hs_opt_out`: Records your opt-out preference (expires in 13 months)
- `__hs_do_not_track`: Prevents the tracking code from sending information to HubSpot (expires in 6 months)

Global Privacy Control Signal

Filot respects the Global Privacy Control (GPC) signal. If your browser sends a GPC signal indicating you do not wish to be tracked, our system will honour that preference. When you dismiss the GPC banner, your preference is recorded and expires in 180 days.

Your Privacy Choices

You have several ways to control how we track and use your data:

- Consent Banner: Accept or decline non-essential cookies on your first visit
- Cookie Settings: You may withdraw or update your cookie preferences at any time through our cookie settings
- Browser Settings: Modify or delete cookies directly through your browser at any time
- Industry Opt-Out Tools: Opt out of tracking via tools such as HubSpot's opt-out mechanism
- Do Not Track Signals: We honour privacy signals, including Global Privacy Control and Do Not Track requests

Opting out of cookies prevents anonymised analytics data (such as traffic and page views) from being associated with your contact record.

Third-Party Integrations

Our consent banner also blocks cookies from HubSpot integrations, including Google Analytics and Google Tag Manager, when you decline consent.

Legal Basis for Processing

For essential cookies, we rely on our legitimate interest in maintaining basic website functionality and security (GDPR Article 6(1)(f)). For non-essential cookies, including HubSpot analytics, advertising, and third-party integration cookies such as Google Analytics and Google Tag Manager, we rely on your consent (GDPR Article 6(1)(a)). You may withdraw consent at any time through our cookie settings or by contacting us at **contact@filot.io**.

8. Compliance and Regulatory Considerations

Filot is focused on security best practices, but Filot is not currently certified for HIPAA, FISMA, GLBA, or other industry-specific regulatory compliance frameworks. Customers are responsible for determining whether the Services meet their specific regulatory obligations and for configuring and using the Services in compliance with applicable law. If we pursue third-party security or compliance audits or certifications (for example, SOC 2), we may describe our status in updated documentation or policies as appropriate.

9. Data Retention

We retain personal information and service data as long as reasonably necessary to provide the Services, maintain security, comply with law, and resolve disputes. Security logs and access records may be retained for auditing and security purposes. If an account is deleted or deactivated, we may retain certain information for a limited period for backups, security, fraud prevention, dispute resolution, or legal compliance.

With respect to documents uploaded to the Services, Filot stores documents as part of providing the Services and retains them in accordance with the applicable customer relationship and service configuration. If a subscribing customer terminates service, documents and related data may be retained for up to 30 days unless deletion is requested earlier, subject to backup and legal compliance needs.

10. Your Rights and Data Requests

Depending on your location and applicable law, you may have rights to request access to, correction of, or deletion of certain personal information, or to object to or restrict certain processing. At this time, users may submit requests by email. Requests for deletion or other privacy inquiries should be sent to **Contact@filot.io**. We may need to verify your identity before responding, and certain information may be retained as permitted or required by law.

External portal users should note that the subscribing customer may control certain aspects of document sharing, access, and retention within the portal. If your request relates to documents or permissions associated with a subscribing customer, you may need to contact that subscribing customer directly.

11. Changes to This Privacy Policy

Filot may update this Privacy Policy from time to time to reflect changes in the Services, security practices, or legal requirements. When we make updates, we will revise the “Effective Date” at the top of this policy. If we make material changes, we will provide reasonable notice, such as via email or an in-app notification.

12. Contact Information

For privacy-related inquiries, please contact:

Philip Lewander, CTO

 Email: philip@filot.io

For GDPR related inquiries, please contact:

EU - Ria Pardeep - ria@workstreet.com

Address:

Workstreet
Bahnhofstraße 8
30159 Hanover
Germany

UK - Daniel June - daniel@workstreet.com

Address:

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1 Emperor Way
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