# Privacy Policy

**Effective Date:** 01/08/2026

## 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.

# 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.

# 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 does not use cookies, tracking pixels, or similar technologies for advertising or cross-site tracking at this time. If this changes in the future, we will update this Privacy Policy and, where required by law, provide appropriate notice and choices.

## 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 **Eddie@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**
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