

Phlo Systems Limited

Privacy Statement

1. Introduction

This statement explains how Phlo Systems Limited (“Phlo”, “we”, “us”, “our”) uses and protects your personal information. We operate the following websites and platforms: phlo.io, opspblo.com, tradepblo.com, and finphlo.com. This statement applies to anyone who visits these websites or uses our software and related services.

2. The Information We Collect

Phlo collects information about you in the following ways:

- When you register for an account, subscribe to our services, or request a demonstration, we collect information that may include your name, business details, contact details, email address, and payment information.
- When you use our platforms, we collect details about your usage and interactions, including log data, device details, browser type, internet protocol (IP) addresses, and cookies.
- When you contact customer support, provide feedback, or query our Legal Team, we keep records of this correspondence.
- We also collect subscriber and client representative data that is necessary to deliver the products and services described in your contract with Phlo Systems Limited.
- We sometimes receive information from third parties, such as integration partners or payment service providers, when this is needed to deliver our service.

3. Why We Use Your Information

Phlo uses your personal data for the purposes listed below:

- To create and administer your account and verify your identity.
- To deliver the services you have requested or subscribed to under your contract with us, which includes supply chain, trade, customs and finance applications.
- To process payments, invoices, and to manage contracts.
- To enable integrations with other tools and partners at your request.
- To comply with our legal obligations, including regulatory requirements.
- To maintain our platforms and services, including security, fraud prevention, and technical support.

- To provide you with updates, notices, and information relevant to your use of Phlo's services.
- To improve our services through analysis of aggregated and anonymised data.
- To communicate with you about changes to our services or this privacy statement.
- To send marketing communications if you agree to receive them. You can opt out at any time by contacting info@phlo.io.

4. Legal Bases for Using Your Data

Phlo will only process your personal information if at least one of the following applies:

- You have entered into a contract with Phlo Systems Limited, or requested that we take steps to enter into a contract.
- You have given us your consent.
- The use of your data is necessary for our legitimate interests, such as ensuring the security and proper functioning of our platforms.
- We are legally obliged to do so.

5. Who Can See Your Information

We may share your information with:

- Our own employees and officers who need access to perform their duties.
- Service providers who help us operate our systems, process payments, host data, and provide technical support.
- Integration partners if you have activated platform integrations.
- Regulators and law enforcement agencies, if we are required to do so by law.
- No information will be shared with advertisers or other third parties for marketing purposes without your explicit consent.

6. International Transfers

If data is stored or processed outside the UK or European Economic Area, we ensure legal safeguards are in place, such as confidentiality agreements and standard contractual clauses approved by regulatory authorities.

7. Cookies and Analytics

We use cookies and similar technologies to make our websites work, remember your settings, and collect analytics for technical improvement.

8. How We Keep Your Data Secure

Phlo Systems Limited takes the security of your personal data seriously and commits to protecting it using a range of measures. Our approach reflects both legal requirements and industry standards for SaaS providers in the UK.

- All data you provide is transmitted using encryption to prevent unauthorised interception during transfer. This includes the use of HTTPS for all of our websites and secure transmission for data sent between your browser or systems and our servers.
- Personal and subscriber information is stored on secure servers located in facilities with electronic access controls. Only authorised employees and contractors who need the information to perform their job have access to these systems.
- We use technical controls such as unique user logins, password policies, and, where available, multi-factor authentication to prevent unauthorised logins and access.
- We run regular security reviews and system monitoring to detect and investigate any unusual or suspicious activity. This includes updating software and applying security patches in a timely manner.
- All access to personal information is logged and monitored. We conduct audits to review who has accessed data and to verify that access has been appropriate and for a valid reason.
- In the event a security issue is detected, we have procedures in place to investigate, limit risks, and resolve the situation as quickly as possible.
- If we identify a data breach that puts your rights or freedoms at risk, we will inform you and the relevant regulators in accordance with statutory requirements.

If you discover a security problem or if you suspect that your account or information may have been compromised, you should let our Legal Team know immediately by email at info@phlo.io. We will take your report seriously and respond as soon as possible.

9. How Long We Keep Your Data

We keep your information as long as it is needed to perform the contract, meet legal obligations or for legitimate business reasons. When the information is no longer needed, we will delete or anonymise it.

10. Automated Decisions

Phlo may use algorithm-based processes to deliver certain features, such as risk assessment and customs handling. If any decision with legal or significant effect on you is made using automated means, you will have the right to request a review from a member of our team.

11. Your Rights

Under data privacy laws, you may:

- Ask for a copy of your data.
- Correct or update your information.
- Ask us to delete your personal data, if circumstances allow.
- Limit how we use your data or object to specific uses.
- Withdraw consent for any uses based on your consent.
- Receive your information in a transferable format and send it elsewhere.
- Raise a complaint about automated decisions.

To exercise any of these rights, email info@phlo.io. We will respond within one month and explain any steps needed to confirm your identity.

12. Updates to This Statement

Phlo will update this privacy statement as needed. If changes are significant, we will notify users by email and on our website.

13. How to Contact Us

If you have any questions or complaints about how we handle your data, please contact our Legal Team at info@phlo.io or in writing at the address listed above.

Last updated in October 2025.