

# Privacy Policy

Last updated: February 2026

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This privacy policy explains how Setflow B.V. ("Setso", "we", "us") collects, uses, stores, and protects your personal data when you use the Setso platform.

Setflow B.V. is the data controller for the personal data processed through our platform. We're registered in the Netherlands (KvK: 91658942) and based in Amsterdam.

If you have questions about this policy, contact us at [privacy@setso.com](mailto:privacy@setso.com). This policy should be read together with our [Terms of Use](#).

## 1. What We Collect

We collect the following categories of personal data:

**Account data** — Your name, email address, role (e.g., producer, AD, camera department), and production company affiliation. Collected when you create an account or are invited to a production.

**Production data** — Schedules, call sheets, scene breakdowns, cast lists, crew lists, location details, and transport plans. Created by production administrators and shared with relevant team members.

**On-set data** — Check-in times, actual hours worked, transport modes used, overtime, and other end-of-day report data. Collected through the crew check-in feature at wrap.

**Sustainability data** — CO<sub>2</sub> calculations, transport emissions, resource usage, and compliance metrics derived from your production and on-set data.

**Usage data** — Pages visited within Setso, features used, device type, browser, and general interaction patterns. Collected automatically to help us improve the product.

**Communication data** — Messages you send to our support team, feedback submitted through the app, and email correspondence.

## 2. How We Use Your Data

We use your data to:

- Operate Setso and deliver call sheets, schedules, notifications, and reports to you and your production team
- Calculate sustainability and compliance metrics for your productions
- Process payments and manage your subscription



- Communicate with you about your account, service updates, and (with your consent) product news
- Improve the platform based on aggregated, anonymized usage patterns
- Ensure the security and integrity of the service
- Comply with legal obligations (tax records, regulatory requirements)

We never sell your data. We never use your production data for advertising. We never share identifiable data with advertisers or data brokers.

### 3. Legal Basis for Processing (GDPR)

Under the General Data Protection Regulation, we process your data on the following legal bases:

**Contract** — Most of our data processing is necessary to deliver the service you signed up for.

**Legitimate interest** — We process some data for product improvement, security monitoring, and fraud prevention.

**Consent** — We ask for your explicit consent before sending marketing communications. You can opt out at any time.

**Legal obligation** — We retain certain financial records as required by Dutch tax and corporate law.

### 4. Who We Share Your Data With

We share data with the following categories of recipients, and only to the extent necessary:

**Cloud infrastructure** — Our platform runs on Microsoft Azure (EU region). All servers are located within the European Union.

**Email delivery** — We use Azure Communication Services to send call sheets and notifications.

**Payment processing** — Subscription payments are handled by Stripe (EU). We never store your full payment card details.

**Analytics** — We use PostHog (EU) to understand how Setso is used. Analytics data is anonymized and aggregated.

**Your production team** — When you're part of a production on Setso, other team members can see information relevant to your role.

**We do not share your data with any third-party advertisers, data brokers, or marketing platforms. Ever.**

We may disclose data if required by law, regulation, or valid legal process (such as a court order).

## 5. Where We Store Your Data

All production data is stored on servers within the European Union. We do not transfer personal data outside the EEA unless strictly necessary and with appropriate safeguards in place, such as European Commission-approved Standard Contractual Clauses (SCCs).

## 6. How Long We Keep Your Data

**Active accounts** — We retain your data for as long as your account is active and you have active productions.

**Wrapped productions** — Production data is retained for 2 years after a production wraps.

**Deleted accounts** — Your personal data is removed within 30 days of deletion.

**Anonymized data** — Aggregated, anonymized statistics may be retained indefinitely. This data cannot be linked back to you.

## 7. Your Rights

Under the GDPR, you have the following rights: access, correction, deletion ("right to be forgotten"), data portability, objection, restriction of processing, and withdrawal of consent.

To exercise any of these rights, email [privacy@setso.com](mailto:privacy@setso.com). We'll respond within 30 days.

If you're unsatisfied with our response, you have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at [autoriteitpersoonsgegevens.nl](https://autoriteitpersoonsgegevens.nl).

## 8. Cookies

**Essential cookies** — Required for the platform to function. You cannot opt out of these.

**Analytics cookies** — Only set with your consent. We use PostHog (EU) for analytics, and all data is anonymized.

**We do not use advertising cookies, tracking pixels, or third-party marketing cookies. Full stop.**

## 9. Children's Privacy

Setso is designed for professional use. We do not knowingly collect personal data from anyone under the age of 16.

## 10. Changes to This Policy

If we make material changes, we'll notify you by email at least 14 days before the changes take effect.

## 11. Contact

Setflow B.V.

Johan van Hasselkade 257, 1032 LP Amsterdam, the Netherlands

KvK: 91658942

Privacy questions: [privacy@setso.com](mailto:privacy@setso.com)

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