

## Matchless reliable hosting provider

Aspiring to be one of the most adaptable and competitive providers

## Privacy Policy

Initial draft: 1/7/2021  
Latest change: 11/5/2022

This Privacy Policy applies to all use of the website and services, and any other communications you have with us from time to time.

## 1. Personal data that we process

Fryxel processes your personal data because you make use of our services and/or because you provide these to us yourself. Below you will find an overview of the personal details that we process:

- Name and surname
- Date of birth
- Address details
- Phone number
- E-mail address
- Business name (if applicable)
- IP address
- Location data
- Other personal data that you actively provide, for example by creating a profile on this website, in correspondence and by telephone
- Information about your activities on our website
- Data on your surfing behaviour across different websites of Fryxel
- Internet browser and device type

You should only submit to us or the website information which is accurate and not misleading. By submitting your or anyone else's data to us or the website, you must ensure that you have full authority and consent to supply us with that data on their behalf and you warrant to us that you have that authority.

## 2. Special and/or sensitive personal data that we process

Fryxel processes the following special and/or sensitive personal data of you:

### Data of persons under 16 years of age

Our website and/or service does not intend to collect data on website visitors who are under 16 years of age. Unless they have permission from their parents or guardian. However, we cannot verify whether a visitor is over 16. We therefore advise parents to be involved in the online activities of their children in order to prevent any data being collected about them without parental permission. If you believe that we have collected personal information about a minor without such consent, please contact us at [legal@fryxel.com](mailto:legal@fryxel.com) we will delete such information.

### 3. For what purpose and on the basis of which basis do we process personal data?

Fryxel processes your personal data for the following purposes:

- Handling your payment
- Sending our newsletter and/or advertising brochure
- Inform you about changes to our services and products
- Offer you the opportunity to create an account
- To deliver goods and services to you

Fryxel also processes personal data when we are legally obliged to do so, such as data that we need for our tax return.

### 4. Automated decision making

Fryxel makes decisions based on automated processing that can have (significant) consequences for individuals. These are decisions that are made by computer programmes or systems, without a person being involved (e.g. an employee of Fryxel). Fryxel uses the following computer programs or systems:

- Fraud detection: We utilize a built-in check (non-third party) to determine if some orders are non-fraudulent. When marked, a Fryxel employee will look in to the case and process or decline your order based on a cause.

### 5. How long we keep personal data

Fryxel will not store your personal details any longer than is strictly necessary for realizing the goals for which your details are collected. We use the following retention periods for the following of personal data:

- Personal details we store for the mandatory 7 years required by the tax authorities. 7 year countdown timer starts from when you no longer have any active services and have opted to close your account
- All other data is stored for 24 months before being purged from our databases, this includes, but is not limited to:
  - General logging (actions carried out on the control panel)
  - Email logs
  - Live chat or tickets including their attachments
  - API logs
  - Abuse reports

## 6. Sharing personal data with third parties

Fryxel will share your personal details with various third parties if this is necessary for the execution of the agreement and to comply with a possible legal obligation. We do not sell your personal data to any third party. We try to limit the amount of third parties we work with. We will enter into a processing agreement with companies that process your details on our behalf, to ensure the same level of security and confidentiality of your details. Fryxel will remain responsible for these processing activities. Fryxel also provides your personal details to other third parties. We will only do so with your explicit permission. The website may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### General third parties:

- TrustPilot A/S - <https://legal.trustpilot.com/for-reviewers/end-user-privacy-terms>

### Payment handling:

When submitting your payment information to PayPal or Stripe, please note that PayPal and Stripe each have their own privacy policies and that we do not accept any responsibility or liability for those privacy policies. Please check those privacy policies before you submit any personal data to PayPal or Stripe.

- Stripe - <https://stripe.com/gb/privacy>
- Paypal - <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>

## 7. Cookies, or similar technologies, that we use

Fryxel uses functional, analytical and tracking cookies. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit this website. Fryxel uses cookies with a purely technical functionality. These ensure that the website works properly and that, for example, your preferences are remembered. These cookies are also used to make sure the website works properly and to optimize it. In addition, we place cookies that track your surfing behavior so we can offer customized content and ads. When you first visited our website, we already informed you about these cookies and asked your permission to place them. You can unsubscribe from cookies by configuring your internet browser in such a way that it does not store any more cookies. In addition, you can delete all information that has previously been stored using your browser settings.

## 8. Viewing, modifying or deleting data

You have the right to view, correct or delete your personal data. You can do this yourself via the personal settings of your account. In addition, you have the right to withdraw your consent for the data processing or object to the processing of your personal data by our company and you have the right to data portability. This means that you can request us to send the personal data we have on you in a computer file to you or another organisation named by you. If you wish to exercise your right to object and/or right of data transfer or if you have any other questions/comments about the data processing, please send a specified request to [legal@fryxel.com](mailto:legal@fryxel.com). To make sure that the request for inspection is made by you, we ask you to send a copy of your identity document with the request. Please make sure that your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of your passport), passport number and Citizen Service Number (BSN) are blacked out in this copy. This is to protect your privacy. Fryxel will respond to your request as soon as possible, but in any case within six weeks. Please note that we retain the right to store personal information for all clients who made an order within the past 7 years which is mandatory for distribution to the tax authorities, if you are within the required 7 years we can disable your account. Disabling your account means nobody can access or request your data, an exception is made for tax authorities.

## 9. How we secure personal data

Cheese takes the protection of your data seriously and takes appropriate measures to prevent abuse, loss, unauthorised access, unwanted disclosure and unauthorised changes. If you are under the impression that your details are not secure, or if there are indications of misuse, please contact us at [legal@fryxel.com](mailto:legal@fryxel.com). Fryxel has taken the following measures to secure your personal details:

- All of our client information / profile data is stored / replicated in multiple locations for redundancy. These locations are mainly based in the European Union, we have more locations which you can see at our website.
- Multi-tiered system for support, limiting access to sensitive details. Developers and operators working at Fryxel are also tiered and do not have complete access to the systems we utilise.
- Encrypted data backups
- Multi factor authentication for staff
- Authenticated API endpoints
- Salts and proven encryption for sensitive details.

## 10. Changes to our Privacy Policy

Any changes made to this Privacy Policy in the future will be posted on the website and, where appropriate, notified to you by e-mail. Each time you visit the website or use our service, you agree to the current Privacy Policy at that time shall apply to all information held by you.

## 11. Contact

Questions, complaints, comments and requests regarding this Privacy Policy are welcomed and should be sent to us through one of our contact options or at [legal@fryxel.com](mailto:legal@fryxel.com).