

# General Data Protection Regulation (GDPR) Statement

**Version:** GDPR-2026.1

**Effective Date:** 10.02.2026

**Legal Contact:** legal@hub-hosting.com

**Jurisdiction:** European Union / Republic of Ireland

## 1. Introduction

This GDPR Statement outlines how **Hub Hosting** ("we", "us", "our", "the Provider") processes and protects personal data in accordance with the **General Data Protection Regulation (EU 2016/679)** ("GDPR") and the **Irish Data Protection Act 2018**.

As a service provider **delivering fully managed web hosting, VPS, cloud storage, and domain registration services**, we are fully committed to ensuring the confidentiality, integrity, and lawful processing of all personal data entrusted to us by our Clients.

## 2. Data Controller and Data Processor Roles

- The **Client** is the **Data Controller** of personal data processed through our services.
- The **Provider** acts as a **Data Processor**, processing data solely on documented instructions from the Client, in accordance with Article 28 of the GDPR.

In certain circumstances (e.g. for our own billing, legal, and account management), we act as an independent **Data Controller**.

## 3. Legal Basis for Processing

We process personal data under the following legal bases (as applicable):

- **Contractual necessity** (Article 6(1)(b)) - to provide the agreed services
- **Legal obligation** (Article 6(1)(c)) - to meet obligations under tax, consumer, and regulatory law
- **Legitimate interest** (Article 6(1)(f)) - for network security, fraud prevention, and service integrity
- **Consent** (Article 6(1)(a)) - where explicitly provided, e.g. for marketing subscriptions

## 4. Categories of Personal Data Processed

We may process the following categories of personal data:

- Contact details (name, email address, phone number)
- Billing information (invoicing address, tax ID, IBAN details if paid via bank transfer)
- Domain ownership details (as required by registries)
- Account credentials and activity logs

- Metadata and technical logs related to service usage (e.g. IP addresses, session identifiers)

We do **not** collect or process special categories of personal data (Article 9 GDPR) unless explicitly agreed upon.

## 5. Data Processing Agreement (DPA)

All personal data processed on behalf of the Client is governed by a binding **Data Processing Agreement (Annex A)**, which forms an integral part of our Terms of Service and includes:

- Subject matter and duration of processing
- Categories of data and data subjects
- Technical and organizational security measures (TOMs)
- Rules for sub-processing and international transfers
- Data breach notification procedures (Articles 33–34 GDPR)

## 6. Data Retention and Deletion

We retain personal data:

- For the duration of the contractual relationship
- In backups and logs for up to **30 days** after service termination, unless a longer retention is legally required
- For invoicing and legal records for a minimum of **6 years**, as required under Irish tax law

Client content and hosted data are deleted **7 days after payment default**, per the Terms of Service.

## 7. International Data Transfers

All data is hosted within the **European Economic Area (EEA)**.

We do not transfer data to third countries unless:

- An **adequacy decision** exists (e.g. EU–US Data Privacy Framework), **or**
- **Standard Contractual Clauses (SCCs)** are in place with appropriate safeguards

## 8. Subprocessors

We maintain a list of authorized **Subprocessors** involved in service delivery (e.g. datacenter providers, registrars, DNS providers). This list is available upon request and regularly updated in accordance with Article 28(2) GDPR.

Clients are notified of any intended changes to Subprocessors with the right to object as per the DPA.

## 9. Data Subject Rights

Data subjects (e.g. the Client's end users) have the right to:

- Access their data (Art. 15)
- Rectify inaccurate data (Art. 16)
- Erase their data ("right to be forgotten", Art. 17)
- Restrict processing (Art. 18)
- Data portability (Art. 20)
- Object to processing (Art. 21)
- Lodge a complaint with a Supervisory Authority (Art. 77)

As Data Processor, we support the Client in fulfilling these requests upon documented instruction.

## 10. Security Measures

We implement appropriate **technical and organizational measures (TOMs)** aligned with **ISO/IEC 27001:2022** and **ISO/IEC 27035:2023**, including:

- Access controls and authentication policies
- Encryption in transit and at rest
- Firewalling and network isolation
- Regular backups and disaster recovery processes
- Monitoring, incident response, and logging

## 11. Data Breach Notification

In case of a personal data breach, we will:

- Notify the Client without undue delay
- Support the Client in fulfilling Article 33 and 34 GDPR obligations
- Cooperate with the **Data Protection Commission of Ireland** or any relevant authority

## 12. Contact and Complaints

If you have any questions regarding our data protection practices, or wish to exercise your rights, please contact:

**Data Protection Officer (DPO)** - [dpo@hub-hosting.com](mailto:dpo@hub-hosting.com)

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