

Privacy Policy

Effective date: 28 July 2026

1. General Provisions

1.1. This personal data processing policy has been drawn up in accordance with the requirements of the UK Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and determines the procedure for processing personal data and the measures to ensure the security of personal data taken by **UPHOST SOLUTIONS LIMITED** (Company number 17188833), hereinafter — the "Company".

1.2. The Company considers the protection of human rights and freedoms in the processing of personal data to be its highest priority, including the protection of the right to privacy and personal and family confidentiality.

1.3. This policy of the Company regarding the processing of personal data (hereinafter — the "Policy") applies to all information that the Company, as the Controller, may obtain about visitors to the websites <https://uphost.cloud> and <https://my.uphost.cloud>, as well as about the Company's clients in connection with the provision of hosting services.

1.4. With respect to the data placed by the Client on rented servers as part of the hosting services, the Company acts as a Processor and processes such data solely to the extent necessary for the provision of the services. The Client, as the controller, is responsible for the lawfulness of the processing of such data.

2. Key Definitions

2.1. **Personal data** — any information relating to an identified or identifiable natural person (data subject).

2.2. **Data processing** — any operation or set of operations performed on personal data, whether by automated means or manually.

2.3. **Website** — the totality of graphic and informational materials, computer programs and databases made available on the Internet at <https://uphost.cloud> and <https://my.uphost.cloud>.

2.4. **Company** — UPHOST SOLUTIONS LIMITED, registered at 128 City Road, London EC1V 2NX, United Kingdom.

2.5. **Controller** — the person who, alone or jointly with others, determines the purposes and means of the processing of personal data.

2.6. **Data processor** — a natural or legal person who processes personal data on behalf of the controller.

2.7. **User** — any visitor to the websites <https://uphost.cloud> and <https://my.uphost.cloud> and/or a client of the Company.

2.8. **Cookies** — small text files placed on your device when you visit our websites.

3. Personal Data Processed

3.1. The Company processes the following personal data of Users:

3.1.1. e-mail address;

3.1.2. full name (where provided);

3.1.3. address (where provided);

- 3.1.4. payment information (details of payments made and transaction identifiers; full bank card details are not collected or stored by the Company — they are processed by payment providers);
- 3.1.5. telephone number (where provided);
- 3.1.6. IP address, technical logs, device and browser information;
- 3.1.7. the content of support requests and correspondence with the Company;
- 3.1.8. information about the use of the services (services ordered, tariffs, terms, balance status).
- 3.2. We also collect and process anonymised data about visitors through web analytics services.
- 3.3. The Company does not deliberately process special categories of personal data and asks Users not to provide such data to the Company. The Company's services are not intended for persons under the age of 18.

4. Legal Bases for Processing under the UK GDPR

- 4.1. **Performance of a contract** (Article 6(1)(b) UK GDPR) — the processing is necessary for the performance of a contract with you, including account registration, provision of services, settlements, refunds and technical support.
- 4.2. **Legal obligation** (Article 6(1)(c) UK GDPR) — the processing is necessary for compliance with our legal obligations under the laws of the United Kingdom (accounting and tax records, sanctions compliance, responses to lawful requests from competent authorities).
- 4.3. **Legitimate interests** (Article 6(1)(f) UK GDPR) — the processing is necessary for our legitimate interests or the legitimate interests of a third party, including ensuring infrastructure security, preventing fraud and abuse, handling complaints (abuse) and protecting the Company's rights.
- 4.4. **Consent** (Article 6(1)(a) UK GDPR) — where you have given your explicit consent to the processing of your personal data (for example, for optional cookies). Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before the withdrawal.

5. Your Rights under the UK GDPR

- 5.1. You have the following rights in relation to your personal data:
 - 5.1.1. the right to be informed about how your personal data is processed;
 - 5.1.2. the right of access to your personal data;
 - 5.1.3. the right to rectification of inaccurate personal data;
 - 5.1.4. the right to erasure of personal data (the "right to be forgotten");
 - 5.1.5. the right to restriction of processing;
 - 5.1.6. the right to data portability;
 - 5.1.7. the right to object to processing;
 - 5.1.8. rights in relation to automated decision-making and profiling (the Company does not make decisions based solely on automated processing that produce legal effects concerning Users);
 - 5.1.9. the right to withdraw consent at any time, where processing is based on consent.
- 5.2. To exercise your rights, send a request to support@uphost.cloud. The Company responds to requests without undue delay and in any event within 1 (one) month of receipt; for complex or multiple requests, this period may be extended by a further 2 (two) months with notice to the User. The Company may request confirmation of the applicant's identity.
- 5.3. You have the right to lodge a complaint with the UK supervisory authority — the Information Commissioner's Office (ICO): <https://ico.org.uk>, tel. 0303 123 1113, address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9

5AF, United Kingdom. We would ask that you give the Company the opportunity to resolve the matter directly before contacting the ICO.

6. Data Sharing and International Transfers

6.1. The Company does not sell Users' personal data. Data may be shared with: infrastructure providers and data centres; payment providers — to the extent necessary for accepting payments and processing refunds; providers of auxiliary services (web analytics, e-mail, ticketing systems) acting as processors under contracts pursuant to Article 28 UK GDPR; competent public authorities — on the basis of binding lawful requests; and professional advisers — subject to confidentiality obligations.

6.2. The server infrastructure of the Company and its providers may be located outside the United Kingdom. In such cases, we ensure appropriate safeguards in accordance with the UK GDPR.

6.3. For international data transfers, we use the standard contractual mechanisms approved in the United Kingdom: the International Data Transfer Agreement (IDTA) or the UK Addendum to the standard contractual clauses. Information about the safeguards applied may be requested at support@uphost.cloud.

7. Personal Data Retention Periods

7.1. Personal data is stored for no longer than is necessary for the purposes of its processing, or for the periods required by the laws of the United Kingdom:

7.1.1. account data — for the duration of the contract and for up to 6 (six) years after its termination, to the extent necessary to comply with tax and accounting legislation and to protect the Company's legal interests;

7.1.2. technical logs and IP addresses — for a limited period necessary to ensure security and investigate incidents;

7.1.3. data placed by the Client on rented servers — deleted in the manner provided for by the Terms of Service: in the event of suspension of the service or late payment, such data is retained for 2 (two) calendar days, after which it may be irretrievably deleted without any possibility of recovery.

7.2. Upon expiry of the retention periods, personal data is deleted or anonymised.

8. Data Security

8.1. We apply appropriate technical and organisational measures to protect personal data in accordance with the requirements of the UK GDPR (Article 32), including encryption of data transmission channels (TLS), access control and infrastructure redundancy.

8.2. All employees with access to personal data undergo mandatory training in data protection and information security and are bound by confidentiality obligations.

8.3. In the event of a personal data breach entailing a risk to the rights and freedoms of Users, the Company notifies the ICO within 72 hours of discovery and, where the risk is high, also the affected Users (Articles 33–34 UK GDPR).

9. Cookies

9.1. The Websites use strictly necessary cookies (operation of the websites, authentication, session security — no consent required) and analytics cookies (anonymised visit statistics — used on the basis of consent where required by law, including the Privacy and Electronic Communications Regulations 2003, PECR).

9.2. You can manage cookies in your browser settings. Blocking strictly necessary cookies may render certain functions of the Websites inoperable.

10. Contact Information

10.1. For any questions concerning the processing of your personal data, please contact us at support@uphost.cloud.

10.2. The current version of the Privacy Policy is freely available on the Internet on the Company's official website. The Company may amend this Policy; the new version takes effect upon publication, and Users are notified of material changes via the Websites, the client area and/or by e-mail.

Company Information

UPHOST SOLUTIONS LIMITED

Company number: 17188833

128 City Road, London EC1V 2NX, United Kingdom

E-mail: support@uphost.cloud

Official website: <https://uphost.cloud>

Client area: <https://my.uphost.cloud>