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1333AV Almere
The Netherlands**

MIRhosting B.V.
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GDPR & Data Protection

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MIRhosting B.V. (“MIRhosting”, “we”, “us”, or “our”) is committed to handling personal data responsibly and in accordance with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

This page explains how we approach data protection, what personal data we may process, why we process it, who may have access to it, and what rights individuals have under the GDPR.

1. Who we are

MIRhosting B.V.
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For the purposes described on this page, MIRhosting may act either as a data controller or as a data processor, depending on the context of the relationship and the service involved.

- We act as a controller when we process personal data for our own business purposes, such as account management, billing, compliance, website administration, support, customer communication, and marketing.
- We act as a processor when we process personal data on behalf of our customers as part of the services we provide. Where MIRhosting acts as a processor on behalf of a customer, the processing of personal data is governed by the applicable service agreement and, where required, a data processing agreement.



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2. What personal data we may process

Depending on the nature of the relationship with us, we may process the following categories of personal data:

- name and surname;
- company name;
- job title;
- email address;
- telephone number;
- billing and business contact details;
- contract and account information;
- support requests and communication records;
- payment and invoicing information;
- website usage data, IP address, and technical logs;
- cookie-related identifiers, online identifiers, approximate location data, browser data, device type, operating system, referral source, and website interaction data;
- service-related technical and administrative data.

We do not intentionally collect special categories of personal data unless this is necessary, lawful, and subject to appropriate safeguards.

3. Why we process personal data

We process personal data only where we have a valid legal basis under the GDPR. Depending on the circumstances, we may process personal data for the following purposes:

- to provide hosting, colocation, cloud, PaaS, and related services;
- to manage customer accounts and contractual relationships;
- to respond to enquiries and provide support;
- to issue invoices and manage payments;
- to maintain the security, availability, and integrity of our systems and services;
- to prevent fraud, abuse, unauthorised activity, and security incidents;
- to comply with legal, tax, regulatory, and compliance obligations;
- to improve our website, services, and customer experience;
- to analyse website traffic, visitor behaviour, approximate location, device characteristics, and the performance of our website and marketing activities;
- to communicate with customers, prospects, suppliers, and business partners.

4. Website analytics and marketing tools

We may use analytics, tracking, and similar technologies to understand how visitors use our website and to improve website performance, usability, content, and marketing effectiveness.



These technologies may collect information such as:

- pages visited;
- time spent on the website;
- approximate geographic location;
- device type;
- browser type;
- operating system;
- referring website or source;
- interactions with pages and website features;
- IP address;
- cookie-related and online identifiers.

For example, we may use:

- Google Analytics, to analyse website traffic, visitor behaviour, approximate location, and device characteristics;
- Google Ads conversion tracking, to measure the effectiveness of advertising campaigns and conversions;
- Meta Pixel, to understand website interactions, measure campaign performance, and improve advertising relevance;
- LinkedIn Insight Tag, to measure campaign performance, understand audience engagement, and improve business marketing activities;
- Matomo, where applicable, for website analytics and traffic measurement.

Where required by applicable law, these technologies are used on the basis of valid consent obtained through our cookie consent mechanism. More information is available in our Cookies Policy.

5. Legal bases for processing

Depending on the circumstances, we rely on one or more of the following legal bases under the GDPR:

- performance of a contract;
- taking steps prior to entering into a contract;
- compliance with a legal obligation;
- legitimate interests, where those interests are not overridden by the rights and freedoms of the individual;
- consent, where consent is specifically required.

Where consent is required by applicable law, including for certain analytics, advertising, or tracking technologies, we will rely on consent obtained through our cookie consent mechanism. Where consent is used, it may be withdrawn at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before that withdrawal.



6. Who may have access to personal data

We restrict access to personal data to those employees, contractors, and service providers who need such access for legitimate business, operational, technical, support, security, or legal purposes.

Depending on the service, personal data may be shared with or accessed by:

- payment providers;
- professional advisers;
- compliance, audit, or legal service providers;
- infrastructure and technical service providers;
- software and platform vendors involved in delivering our services;
- analytics, advertising, and marketing technology providers;
- public authorities, regulators, courts, or law enforcement bodies where disclosure is required by law.

Virtuozzo access in connection with PaaS services

For certain Platform-as-a-Service (PaaS) solutions, MIRhosting uses Virtuozzo software. Although these services operate on infrastructure hosted by MIRhosting on servers located in the European Union, Virtuozzo, as a software vendor and technology provider, may, where necessary, have limited access to personal data processed within or through that platform where such access is necessary for:

- support and troubleshooting;
- maintenance and updates;
- security management;
- technical issue resolution;
- ensuring the proper operation of the platform.

Virtuozzo lists Virtuozzo International GmbH, Schaffhausen, Switzerland among its corporate entities. Depending on the support or operational scenario, access may also involve relevant Virtuozzo group entities or subprocessors in other jurisdictions, subject to applicable contractual, organisational, and legal safeguards.

Any such access is limited to what is strictly necessary for the relevant support, maintenance, security, or operational purpose.

7. International data transfers

As a general rule, MIRhosting aims to host and process personal data within the European Union / European Economic Area (EU/EEA).



Where personal data is transferred outside the EU/EEA, we will ensure that appropriate safeguards are in place as required by the GDPR, including, where relevant:

- an adequacy decision of the European Commission;
- the European Commission's Standard Contractual Clauses;
- or another valid transfer mechanism recognised under applicable data protection law.

8. Data retention

We retain personal data only for as long as necessary for the purposes for which it was collected, including for contractual, legal, accounting, tax, compliance, security, dispute-resolution, and evidentiary purposes.

Retention periods may vary depending on the category of data and the purpose of processing. When personal data is no longer required, it is deleted, anonymised, or securely destroyed, as appropriate.

9. Data security

MIRhosting applies appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or unauthorised access.

These measures may include:

- access controls and role-based access limitation;
- authentication and account protection measures;
- logging and monitoring;
- encryption where appropriate;
- network and infrastructure security controls;
- backup and recovery procedures;
- internal policies and access restrictions based on business need.

10. Data subject rights

Under the GDPR, individuals may have the following rights, subject to applicable legal limitations:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restriction of processing;
- the right to data portability;
- the right to object;
- rights related to automated decision-making and profiling, where applicable.



To exercise any of these rights, please contact us at legal@mirhosting.com.

We may need to verify identity before responding to a request. We will respond within the timeframes required by applicable law.

11. Complaints

If you believe that your personal data has been processed in violation of applicable data protection law, you may contact us at legal@mirhosting.com.

You also have the right to lodge a complaint with the competent supervisory authority. In the Netherlands, this is the Autoriteit Persoonsgegevens.

12. Updates

We may update this page from time to time to reflect legal, technical, or operational changes. The latest version will always be published on this website.

