

# Squidix

## General Data Protection Regulation (GDPR) Policy

While Squidix is proudly based in the United States or America, we do have clients who are governed by the General Data Protection Regulation (GDPR.) As such, Squidix provides the following policy for the release of personal data under the GDRP as follows:

### **User Website and Email Data**

Squidix does not routinely consider the data and content a user generates and stores on their website applicable to the GDRP since the user, and not Squidix, creates and maintains such data, even if the data includes personal data that would have otherwise been covered under the GDRP. For example, if a blog is written by someone and includes personal data and such data is further posted on the Squidix server(s) then that user has a copy of such data or can retrieve such data from their account on their own accord. If a GDRP request is submitted for this data, Squidix will provide the user the necessary login details to access this data, which will be limited to root access to the server and/or WHM and/or CPanel and/or FTP access to the data.

Further, email data for a particular client is also exempt from the GDRP for the same reasons.

***Squidix stores this data on behalf of a client for the duration of their business relationship with Squidix. See backup and retention of stored data, below.***

### **Personal Client Data and Account Data**

Personal data associated with a user's account not on public websites is expressly covered by our privacy policy and users can access this data at any time, using their Squidix account login. This data is not available to third parties and is only used within Squidix for technical support, accounting and Squidix notifications, for service notifications and occasional promotions. If a GDRP request is submitted for this data, Squidix will provide the login necessary for the user to access this data, which includes:

- Name
- Address
- Phone
- Email
- Product and Services ordered history
- Technical support tickets and history
- Squidix Email and notification history (does not include private emails)
- Payment and history – please note that our payment processors may also maintain separate records which a user can request individually to the payment processor. Users can locate their payment processor on receipts from their Paypal, Credit Card Processor, or Bank.

***Squidix stores this data on behalf of a client for the duration of their business relationship with Squidix. See backup and retention of stored data, below.***

### **Backups and Stored Data**

We regularly store backups of both website and email and personal client data, and the only differences are that the backups are usually compressed versions of the same data (historically) and available from the different categories of Squidix data as listed above. As such, any request for historical data (backups) will be treated as an additional request and any we will charge a reasonable fee as allowed by the GDPR to recover, restore and segregate the backup data to ensure that only the client/user data is provided. This is clearly articulate in Chapter III, Section 1, Article 12, Paragraph 5: .... Where requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character, the controller may either: a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested; or (b) refuse to act on the request.

### **Length of Storage**

All data stored by Squidix could be stored for years after a user cancels an account, because of our backup retention does not require that our backups ever be destroyed.

See policy details regarding backups and stored data for more details.

### **Requests from Children**

Squidix does not store any data from children, and only performs business with adults aged 18 or over. As such, any requests for child data is not applicable. Squidix requires acknowledgement that all payments (account holders) must be at least 18 years of age.

### **Aggregate data**

Squidix does use the follow data in aggregate to improve network performance. These data are not individually identified unless there is a technical issue which would justify such identification.

- Server bandwidth
- Server disk usage
- Network performance
- CPU utilization

### **Data Protection Officer**

Squidix has assigned Mr. Frank Lindsey as the DPO for our company.