

## GPDR TotallyHosted

This document describes the role of TotallyHosted in the General Data Protection Regulation (GPDR).

All organizations that process personal data must comply with this regulation with effect from 25 May 2018.

### Role TotallyHosted

The AVG has two types of processors of personal data: The controller and the processor. TotallyHosted is active in both roles:

#### Controller:

Wij zijn verantwoordelijk voor de persoonsgegevens die klant met ons deelt wanneer klant een product aanschaft bij ons. Wij slaan hiervoor de volgende (persoons)gegevens op:

- First name
- Last name
- Address
- Zipcode
- City
- Country
- Phone number
- Email address
- Password (Safely encrypted, never pure text)
- IP-address
- IBAN account details (Only when paying through direct debit)

These data are all required for the products we supply (for example, requesting a domain name) and being able to create invoices.

We therefore share this information, when necessary, with the various domain registries when you place an order for a domain name. We only play a mediating role, these applications are subject to the applicable rules and procedures of the relevant registration authorities, such as Stichting Internet Domeinregistratie Nederland (SIDN). In order to implement the application, TotallyHosted will provide data to these bodies in the context of the application (personal).

In the context of tax returns, TotallyHosted will transfer its bookkeeping to the administration office Wilhelm & Partners. This includes Name and address details of all customers who purchase at least 1 product.

#### Processor:

We are processors for the data that the customer shares with us in our products, such as web hosting and e-mail. For this, the customer is the processor responsible. This means that the customer is the processor responsible for the data that the customer stores from visitors and / or customers.

As a processor responsible, the customer must document which data client stores for his / her customers and visitors, how the customer protects it, why the customer saves it (for example: fiscal retention, operation of the website, etc.) and how long the customer saves it. In addition, it must be documented with which parties (personal) data are exchanged and why.

TotallyHosted does not take cognizance of non-public information, including personal data, that is placed on our systems by the customer, unless this is necessary for proper performance of the service, or this inspection is based on a legal obligation.

TotallyHosted does make automated copies of the data that is placed on our systems by the customer. This is done without the inspection of (employees of) TotallyHosted, and aims to provide data for recovering from damage to hardware or lost data.

The transfer and storage of these copies is done in a safe way:

- The copy is transferred via a secure connection (SSH)
- The copy is stored in a European data center (ISO27001 certified)
- A second copy is stored in a second European data center (ISO27001 certified) via a secure connection
- The servers on which these copies are stored are completely closed with a firewall, and can only be accessed from our VPN via a secure encrypted connection on a non-standard port. In addition to a login with username + password, these are also protected with a 2-factor authentication in the form of a 6-digit code valid for only 30 seconds, and a brute-force detection method to automatically block invalid attempts.

The copies we store are kept for **at least 1 week** and **up to 2 weeks**. This can vary per web server and is automatically cleaned up based on the creation date of the copy.

#### [Contact details](#)

If after reading our AVG, questions or comments, please contact us in writing or by e-mail.

**Address:**

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