

# Privacy Policy

This Privacy Policy describes how **GalaxyNode Hosting S.L.** (hereinafter “GalaxyNode”) collects, uses, stores, and protects your personal data. It also outlines your rights regarding your data and how we comply with the European Union’s General Data Protection Regulation (GDPR), Spanish data protection laws, and other applicable legal frameworks.

We are committed to safeguarding your privacy and transparency regarding how we manage your data. Please review this policy carefully to understand how we handle your information.

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## 1. Appointment of a Data Protection Officer (DPO)

GalaxyNode has appointed a Data Protection Officer (DPO) to oversee all aspects of data protection within the company. For any questions or concerns related to your personal data or privacy rights, you can contact our DPO at: **dpo@galnod.com**.

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## 2. Binding Nature of This Policy

- a. This Privacy Policy applies to all services offered by GalaxyNode, including those owned or controlled by GalaxyNode Hosting S.L. or its subsidiaries.
- b. By using any of our services, you acknowledge that you have read and agree to the terms outlined in this Privacy Policy.

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## 3. Data Retention

- a. In accordance with the GDPR, GalaxyNode will retain personal data for no longer than necessary to fulfill the purposes for which it was collected. Data may be retained for up to five years from the point it is deemed no longer necessary, for purposes such as taxation compliance and legal obligations under Spanish and international law.
- b. Site access logs, including cookie data, are retained indefinitely to ensure security and operational efficiency. These records will expire either when deleted by the user or when cookies naturally expire.
- c. Service files (data uploaded by users to GalaxyNode’s services) may be retained for as long as necessary, even beyond the termination of the user’s relationship with GalaxyNode.

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## 4. Data Erasure

- a. You have the right to request the erasure of your data. To do so, you must provide verification of your identity and billing details before we can process your request.
- b. This policy does not limit or waive any rights granted to you under applicable

data protection laws.

c. The data erasure process is as follows:

1. Submit a formal request for data erasure.
2. Within 24-48 hours, GalaxyNode will request identification documents.
3. Upon receipt of the documents, we will confirm the next steps and, where applicable, notify you of the acceptance or denial of your request.
4. If the request is denied, you will be provided with an appeal process.

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## 5. Right of Appeal

If you disagree with our decision regarding your data erasure request, you may appeal our decision within 28 days of receiving our written response. If no appeal is made within this period, you waive your right to contest the decision.

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## 6. Data We Collect

GalaxyNode collects and processes the following types of personal data:

- **Personal Identification Information (PII)**: Name, email address, phone number, postal address, IP address, and geolocation.
- **Cookies** and related log-based data: Internet Protocol (IP) address, browser type and version, pages visited, time and date of visits, and duration of page visits.
- **Third-party services** may also collect data. Each third-party service is governed by its own privacy policies, and we encourage users to review these policies.

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## 7. Sharing Data with Third Parties

We may share your personal data with third-party service providers for operational purposes, including but not limited to marketing, service delivery, or legal compliance. These third-party services include, but are not limited to:

- Google LLC - Cloudflare, INC - WHMCS Limited - Group Galnod, S.L and or its subsidiaries

These third parties have their own privacy policies, and we advise you to consult them directly for details about how they handle your data.

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## 8. Access by Law Enforcement Agencies

In certain circumstances, GalaxyNode may be required to provide personal data to law enforcement agencies in response to legal orders, such as court orders or subpoenas. Requests for such access should be directed to our DPO at **dpo@galnod.com**. We aim to respond to such requests within a maximum of 72 hours.

## **9. Right to Access Your Data**

You retain the right to access the data we hold about you.

- You may submit one data access request (SAR) within any 30-day period.
- You may request up to six data records per year. Additional requests will be subject to an administrative fee of \$60.
- To submit a SAR, please contact us at **support@galnod.com**.
- GalaxyNode may take up to two months to process your SAR, especially if it is complex. If any fees are incurred, you will be notified beforehand.
- As part of the verification process, we may request identification documents, such as a government-issued passport, driving license, and proof of address.

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## **10. Data Breach Notification**

In the rare event of a data breach, GalaxyNode is committed to complying with the GDPR's breach notification requirements.

- You will be notified within **48 hours** of GalaxyNode becoming aware of the breach.
- We will provide details about the nature of the breach, including the data affected, and the steps we are taking to mitigate the impact.
- GalaxyNode will work with relevant authorities to investigate the breach and prevent further incidents.
- The Data Protection Officer will manage the breach notification process, ensuring timely and appropriate communication with affected users.

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## **11. Data Collection & Consent**

By using GalaxyNode services, such as our website, game servers, virtual private servers, or other products and services, you consent to the collection and processing of your personal data as outlined in this policy.

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## **12. Links to Third-Party Services**

Our website and services may contain links to third-party websites or services. Please note that GalaxyNode is not responsible for the privacy practices or content of these external sites. We encourage you to review the privacy policies of any third-party services you visit.

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## **13. Updates to This Policy**

GalaxyNode reserves the right to update this Privacy Policy periodically. We will notify you of any material changes by posting the updated policy on our website. Changes will take effect immediately upon posting. We recommend that you review this Privacy Policy regularly to stay informed about how we handle your data.

**Legal Basis for Data Processing**

Our legal basis for processing personal data is based on the necessity of processing for the performance of a contract, compliance with legal obligations, or our legitimate business interests, as provided by applicable law, including the GDPR and Spanish data protection regulations.