# PRIVACY POLICY

# mythic beasts

Mythic Beasts understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our website, mythic-beasts.com ("Our Site"), as well as the privacy of all customers who use our services. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested when you use Our Site and services.

#### 1. Information About Us

Our Site is owned and operated by mythic-beasts.com and all services offered by the company are offered and operated by Mythic Beasts Ltd, a limited company registered in England under company number 04052652.

Registered address:	PO Box 1363, 45 Argyle Street, Cambridge, England, CB1 0FJ.
Data Protection Officer:	Richard Smith
Email address:	support@mythic-beasts.com

## 2. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Site and the use of any of our services. Our Site uses only necessary cookies as we believe in your right to privacy online.

#### 3. What Is Personal Data?

Personal data is defined by the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 as amended, and any successor legislation as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details in Part 12.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 12.

## 5. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data OR personal data relating to children NOR data relating to criminal convictions and/or offences.

# Mythic Beasts Is the Data Controller of the Following Data

- 1. We are the data controller for all systems which are for our internal use. This includes our systems for customer support, billing, finances, and human resources.
- 2. We are the data controller for all personal data on our mail hubs. Customers have no access to these (other than to send mail through them) and have relatively little control over how mail is processed on them.
- 3. We are the data controller for all personal data on our nameservers, other than any personal data which customers may have put into their zone files, for which we are just a data processor.
- 4. We are the data controller for all personal data in server logs on our shared hosting servers, except where we have given the User control over what is logged and how long the logs are retained, and the ability to delete logs, in which case we are just a data processor.
- 5. We are a data processor of all User data on shared hosting servers or shared database servers. This includes data stored on websites, in mailboxes, or in databases.
- 6. We are a data processor for all personal data on any customer's virtual server, dedicated server, or co-located server which we have been given permission to access, whether via a server management contract or through some other arrangement.
- 7. We are a data processor for all personal data which is backed up to our backup servers, unless the data being backed up is data for which we are data controller, in which case we are data controller for the backup too.

We are neither the data controller nor a data processor of personal data on any virtual server, dedicated server, or co-located server which the customer has not given us permission to access, notwithstanding the fact that it may sometimes technically be possible for us to gain access to them.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Lawful Basis
In providing our products and services we will process company information to allow us to fulfil our contractual obligations.	We use company contact data, details of company offices, and company finance details.	Under contract fulfilment to collect this data.

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Collect server logs.	Detail of the service being accessed, the date and time of the connection, the IP address used to connect to the service, and any username used to authenticate access to the service. Passwords are never logged.	Legitimate interest.
Web server logs.	Including the URL being accessed (including any "GET" CGI parameters), and the User-agent string which typically identifies the name and version of the web browser or operating system. Content in the bodies of HTTP requests or responses is not logged.	Legitimate interest.
Email server logs.	Including the envelope sender and recipients, and the subject line of the email being sent. Content in the bodies of email messages is not logged, but may be processed by spam- detection software and the result of this is logged.	Legitimate interest.
Identify and respond to your requests to administer account services and products provided by us.	Email address, and areas of site visited. Postal address, telephone number as appropriate.	We have prior consent freely given when allowing cookies on Our Site. Consent, contract fulfilment, legitimate interest.
Collect network monitoring data. We record data from network protocol headers (specifically Ethernet, IPv4, IPv6, ICMP, TCP, and UDP) for a sample of packets passing through our routers (currently 1/1000).	This includes source and destination IP addresses, packet size and protocol, and source and destination ports. Other than these headers, the content of packets is not stored.	Legitimate interest. Compliance with law.

A log of major operations performed via our control panel, such as when a server is rebooted, or the nameservers for a domain are changed.	This includes actions performed, IP address, and name.	Consent, legitimate interest, and compliance with law.
Contacting Mythic	Email address, telephone	Consent and legitimate
Beasts.	number as appropriate.	interest.

With your permission, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message or post, with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam.

Your data will be held according to our Retention Policy. If you would like to see the retention times of the data we collect, please use the contact details in this Policy.

We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt out.

We do not share data with third parties except where it forms part of your provision of service, and you have explicitly consented to opt out at any time regarding this data being shared.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 12.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights – for instance, in the case of legal proceedings or where legitimately requested for legal purposes.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

For full information please request a copy of our Data Retention Policy.

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Type Of Data	How Long We Keep It
Company information relating to service delivery including personal data relating to company officers.	Until the service period has expired and we are no longer required to keep accounting records.
Personal data collected from clients.	Normally held for up to 11 years or upon request for deletion.
Financial information.	11 years.
Network monitoring data.	Up to 12 months.
Control panel major operations logs.	3 years.
Correspondence.	Indefinitely at the company's discretion.

# 8. How and Where Do You Store or Transfer My Personal Data?

To provision web services, we may need to transfer your data to other companies located outside of the UK. This includes:

Domain registration

SSL certification

The data protection laws in these countries may differ from the UK, but we will never undertake these transfers without your explicit consent. If you would like more information, please contact us.

Excepting the above, all personal data is stored in the UK. This means that it will be fully protected under the UK Data Protection Legislation.

Please contact us using the details in Part 12 for further information about the particular data protection mechanism(s).

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- Limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- Procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your personal data) including notifying you and/or the

Information Commissioner's Office where we are legally required to do so.

#### 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception(s):

- To supply products, we will share necessary details with our registrars.
- If you consent to be contacted for server monitoring, we will share your designated phone number with a third party service to facilitate this service.
- We contract a third party to process your personal data for administrative reasons. In such a situation, the third party will be acting as the data processor under us as data controllers, and the data processor will be based in the United Kingdom or European Economic Area.
- If you use a service which requires sending you an SMS message such as if you enable two-factor authentication on your account or configure SMS monitoring of a server – we may disclose your phone number to an SMS provider who may be outside the European Economic Area.
- If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

#### 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is normally no charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs incurred in responding.

We will respond to your subject access request within 28 days and normally, we aim to provide a complete response, including a copy of your

personal data, within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of (our) progress.

For your security we may require proof of identity in which case, we will contact you to request such proof. The 28-day timeframe for our response to your request will then start from the point that we receive such proof.

# 11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Data Protection Officer:	Richard Smith
Email address:	support@mythic-beasts.com
Postal address:	Mythic Beasts, PO Box 1363, 45 Argyle Street, Cambridge, England, CB1 0FJ.

## Changes To This Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

This Privacy Policy was last updated on 1/6/2023.