DATA PROCESSING POLICY

XYNOMIX

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Xynomix holds all regulatory and industry best practice processes and standards in the highest regard, with the application of these processes and systems underpinning the entire business. Xynomix complies with the UK GDPR (General Data Protection Regulation), the DPA (Data Protection Act) 2018 and the EU GDPR. Julia McMurray (Operations Manager) has been appointed as Xynomix's Privacy Officer in line with Data Protection best practice.

Information Commissioner's Office reference No.:

Registration from:

ZA095658

Registration end date:

20th January 2015 19th January 2026

How this affects our customers

As a database Managed Service Provider, Xynomix does not extract, control or process data on behalf of any of its clients unless explicitly permitted to do so by the client using the Xynomix change control processes. Xynomix manages the structure and performance of the underlying database itself. At no point does Xynomix move or process any end client data. The only data managed or taken from the customer database environment is done so using secure, encrypted methods and is purely the database's own performance-related data (metadata).

The information we store

The only personal data that Xynomix holds within our own systems is that of potential or current customer information in order for us to operate our services to our clients effectively. This information includes but is not limited to, company registration number, address, contacts, billing data, system environment and software licensing information, etc. This information is held in either our accounting system and/or cloud-based CRM system. Access to these systems is restricted, strictly controlled and fully auditable.

The use and access of data by its staff members and the ability to download information is monitored closely with annual reviews of the data procedure. Any areas of improvement or change required to fulfil regulatory or best practice guidelines will be documented and implemented at that time.

How long does Xynomix store information?

Client Data - 7 years post cessation of trading, in line with business best practice.

Individual Data - No individual personal data is stored. Xynomix employee information is held for 7 years post employment cessation.

Other data - Potential customer contact data is stored on our CRM system and regularly assessed in line with GDPR regulatory compliance.

What happens if there is a breach?

As all data is held within leading technology vendor's cloud systems (including Google, Salesforce, Sage and Freshworks), Xynomix assessed the risk of any breach as minor. However, should a breach occur, Xynomix would seek recompense from the providers. In the unlikely event of a breach, Xynomix would own the resolution process with the vendor.

Get in Touch

Xynomix is confident in the systems and processes employed and is happy to support client audits. These can be arranged by making a request via your account manager or emailing <u>gdpr@xynomix.com</u>

Ref: XNX-GPS v2.1