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Last reviewed: July 2026
Next review: July 2027

PUBLIC

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.

For the personal data of customers, potential customers and employees Xynomix holds within its own systems, Xynomix acts as the Data Controller.

Information Commissioner's Office reference No:

ZA095658

Our Role As Data Processor & Data Controller

As a database Managed Service Provider, Xynomix's primary role is to manage the structure and performance of the underlying database itself, acting as a Data Processor for performance-related data (metadata). Xynomix does not extract, control, move or process any end client data unless explicitly permitted to do so by the client using the Xynomix change control processes. The only data managed or taken from the customer database environment is the database's own performance-related data (metadata), done so using secure, encrypted methods.

The Information We Store & Lawful Basis For Processing

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.

Lawful Basis for Processing

Current Customer Data: Processing is necessary for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract (UK GDPR Article 6(1)(b)).

Potential Customer Contact Data: Processing is based on the legitimate interests (UK GDPR Article 6(1)(f)) of Xynomix to engage in business development and direct marketing.

How Long Does Xynomix Store Information?

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

Employee Data - Xynomix employee information is held for 7 years post employment cessation.

Potential Customer Contact Data - Stored on our CRM system and regularly assessed in line with GDPR regulatory compliance.

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Your Rights As A Data Subject

Under the UK GDPR, you have the following rights regarding your personal data held by Xynomix:

- Right To Access (Subject Access Request - SAR) - You have the right to request a copy of the personal data we hold about you.
- Right To Rectification - You have the right to have inaccurate or incomplete personal data corrected.
- Right To Erasure - You have the right to request that your personal data be deleted ("The Right to be Forgotten").
- Right to Restrict Processing - You have the right to ask us to stop processing your data under certain circumstances.
- Right to Data Portability - You have the right to request that your data be transferred to you or another controller in a commonly used format.
- Right to Object - You have the right to object to the processing of your personal data, particularly where we are relying on legitimate interests or for direct marketing purposes.

To exercise any of these rights, please submit your request to the Privacy Officer via email at gdpr@xynomix.com. Xynomix will respond to all valid requests within one calendar month.

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.

In the event of a data breach, Xynomix would manage the resolution process directly with the vendor and seek full recompense from the respective provider.

In line with UK GDPR requirements, Xynomix is committed to notifying the Information Commissioner's Office (ICO) and the affected data subjects without undue delay, and where feasible, within 72 hours of becoming aware of the breach, if the breach is likely to result in a risk to the rights and freedoms of natural persons.

Contact Information & Complaints

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

Data Protection Queries & Complaints

For any questions regarding this policy, to exercise your rights, or to lodge a complaint, please contact our Privacy Officer via gdpr@xynomix.com

If you are dissatisfied with Xynomix's response to your complaint, you have the right to lodge a format complaint with the UK supervisory authority - Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, SK9 5AF. Tel: 0303 123 1113. Website <https://ico.org.uk/>