Privacy Policy

Document	**Privacy Policy**
Version	**1.1**
Effective date	**1st March 2025**
Revision effective from	**13th November 2025 (to reflect the notification of the Digital Personal Data Protection Rules, 2025)**
Approved by	**Board of Directors, VirtuHost Support Private Limited**
Applies to	**VirtuHost Support Private Limited ("VirtuHost"), CIN U62099GJ2025PTC157908, registered office at 401, City Point, Near Paras Circle, Nadiad, Kheda, Gujarat, India 387001, and its office at Office 1104, 36-37, Jethalal Parekh Road, near Jhunjhunwala College, Shival Nagar, CGS Colony, Ghatkopar West, Mumbai, Maharashtra 400086, India**
Next review	**12th May 2027**
Privacy contact	**privacy@virtuhostsupport.com**
Grievance Officer (India)	**HR Department - HR@virtuhostsupport.com - 401, City Point, Near Paras Circle, Nadiad, Kheda, Gujarat, India 387001**

Policy Statement

This privacy policy applies between you, the user of this website or our services, and VirtuHost Support Private Limited ("VirtuHost"), the owner and provider of this website. VirtuHost is an Indian managed-service provider delivering managed IT, cyber security, cloud, network operations and security operations services, principally to hospitality businesses in the United Kingdom and Ireland. VirtuHost takes the privacy of your information very seriously. This privacy policy explains how we collect, use, share and protect personal data collected by us or provided by you, and how you can exercise your rights. It is published in accordance with the Information Technology Act, 2000 and the Information Technology (Reasonable Security Practices and Procedures and

Sensitive Personal Data or Information) Rules, 2011 and, as their provisions come into force, the Digital Personal Data Protection Act, 2023 and the Digital Personal Data Protection Rules, 2025.

Revision note: this policy took effect on 1 March 2025. It was revised with effect from 13 November 2025 to reflect the notification of the Digital Personal Data Protection Rules, 2025, whose provisions come into force in phases. The revision does not interrupt or restart the operation of this policy.

Definitions and Interpretation

1. In this privacy policy, the following definitions are used:

Data

Collectively all information that you submit to VirtuHost via the website or otherwise in connection with our services, including personal data. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.

Personal Data

Any data about an individual who is identifiable by or in relation to such data.

Cookies

A small text file placed on your computer by this website when you visit certain parts of the website and / or when you use certain features of the website. Details of the cookies used by this website are set out in the clause below (Cookies).

Data Protection Laws

Any applicable law relating to the processing of personal data, including the Digital Personal Data Protection Act, 2023, the Digital Personal Data Protection Rules, 2025, the Information Technology Act, 2000 and the rules and directions made under it, and, where they apply to the processing of your personal data, the UK GDPR, the UK Data Protection Act 2018 and the EU General Data Protection Regulation (EU) 2016/679.

DPDP Act

The Digital Personal Data Protection Act, 2023, together with the rules made under it, as amended from time to time.

Data Fiduciary, Data Processor and Data Principal

Have the meanings given in the DPDP Act (broadly equivalent to “controller”, “processor” and “data subject” under the GDPR).

VirtuHost, we or us

VirtuHost Support Private Limited, a company incorporated in India with Corporate Identity Number U62099GJ2025PTC157908, whose registered office is at 401, City Point, Near Paras Circle, Nadiad, Kheda, Gujarat 387001, India, and whose office is at Office 1104, 36-37, Jethalal Parekh Road, near Jhunjhunwala College, Shival Nagar, CGS Colony, Ghatkopar West, Mumbai, Maharashtra 400086, India.

User or you

Any person who accesses the website or provides personal data to us, including the named representatives of our clients, prospective clients and suppliers.

Website

The website that you are currently using, www.virtuhostsupport.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa;
- references to clauses are to clauses of this privacy policy;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- “including” is understood to mean “including without limitation”;
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this privacy policy.

Scope of This Privacy Policy and Our Role

3. When VirtuHost is the Data Fiduciary (controller)

VirtuHost decides how and why personal data is processed, and is responsible to you directly, for: the identity and contact details of our clients’ and prospective clients’ named representatives; website visitor and marketing data; supplier and vendor contact data; and our own account, billing, licensing and support-ticket records. This privacy policy applies to that personal data.

4. When VirtuHost is a Data Processor (processor)

When we manage, monitor, secure or back up a client's systems, the personal data inside those systems (for example, a hotel's guest, staff or CCTV records) belongs to our client. We process it only on our client's documented instructions and for no purpose of our own. Our client is the Data Fiduciary (controller) for that data, and the client's own privacy notice applies to it. If you are a client's guest or employee and want to exercise your rights over that data, please contact the client directly; if you contact us, we will pass your request to the client and help them respond. Under section 17 of the DPDP Act, certain obligations of that Act do not apply to personal data of individuals outside India that we process under a contract with a person outside India; we nevertheless protect that data to the standards required by our contracts and by the Data Protection Laws that apply to our clients.

5. This privacy policy does not extend to any websites that can be accessed from this website,

including any links we may provide to social media websites.

Data Collected

6. We may collect the following personal data from you:

- identity and contact details, such as your name, job title, organisation, email address, telephone number and postal address;
- information you provide when you contact us, request a quote, raise a support request or use our services, including support tickets and correspondence;
- account and billing details for business clients and suppliers, such as invoicing address, GSTIN and payment status (complete payment-card details are handled by an authorised payment provider and are never stored by us);
- device and usage data, such as IP address, browser type and version, operating system, timestamps and security logs (automatically collected);
- pages viewed on this website, the site you came from and the site you exit to (automatically collected); in each case, in accordance with this privacy policy.

We do not intentionally collect sensitive personal data or information (such as financial account credentials, health or biometric information, or government identifiers) as Data Fiduciary, and we ask that you do not send it to us. Our services are business-to-business and are not directed at children (individuals under 18 years of age); we do not knowingly collect children's personal data.

How we Collect Data

7. We collect data in the following ways:

- directly from you, when you contact us through the website, by telephone, post or email, or when you use our services;
- from your employer or organisation, where it is our client or supplier and has named you as a contact;
- from our service providers, such as website analytics and security providers; and
- automatically, when you use the website (see “Cookies” below).

Our Use of Data and Lawful Basis

8. We process your personal data only for lawful purposes and only where:

- you have given us your consent for a specified purpose, which must be free, specific, informed, unconditional and unambiguous;
- you have voluntarily provided your personal data to us for a specified purpose (for example, to request a quote or support) and have not indicated that you do not consent to its use for that purpose;
- the processing is necessary to perform a contract with you or your organisation, or to comply with law; or
- the processing is otherwise a legitimate use permitted under the DPDP Act or, where the GDPR applies, has another lawful basis under it (such as our legitimate interests in running and securing our business).

9. We use your personal data for the following purposes:

- responding to your enquiries and providing quotations;
- providing, supporting and invoicing our services, and managing our relationship with our clients and suppliers;
- authenticating users and protecting our services against fraud, abuse and security incidents;
- keeping records and complying with our legal, tax and regulatory obligations;
- improving our services and this website; and

- sending marketing communications that may be of interest to you, where you have consented to receive them.

10. Marketing communications

We will only send you marketing communications where you have consented or where the law otherwise allows it, and every message will contain an easy way to unsubscribe. Withdrawing consent is as easy as giving it and does not affect processing carried out before you withdrew it.

11. Our commitments

We do not sell personal data. We do not share personal data for cross-context behavioural advertising or use it for targeted advertising. We never use our clients' personal data, or your personal data, to train general-purpose artificial-intelligence models, and we only use approved tools to process personal data.

Who we Share Data With

12. We may share your data with the following groups of people for the following reasons:

- our service providers acting as Data Processors on our behalf (for example, hosting, infrastructure, security, communications, support, analytics and payment providers), under written agreements that require confidentiality, appropriate security and use only on our instructions;
- our professional advisers, auditors, insurers and banks;
- your organisation, where it administers its own users of our services;
- government bodies, courts or regulators, where disclosure is required by law; and
- parties involved in a genuine sale or reorganisation of our business, subject to confidentiality.

13. Transfers between countries

Our teams are based in India and many of our clients are in the United Kingdom and Ireland, so personal data may be transferred into and out of India. We do not transfer personal data to any country restricted by the Central Government under the DPDP Act. Where personal data protected by the UK or EU GDPR is transferred to us in India, we use the safeguards required by those laws, such as the European Commission's standard contractual clauses or the UK International Data Transfer Agreement or

Addendum. Copies of the relevant safeguards may be requested at privacy@virtuhostsupport.com.

Keeping Data Secure

14. We implement reasonable security practices and procedures to safeguard your data, including:

- encryption of personal data in transit and at rest;
- multi-factor authentication and least-privilege access to systems holding personal data;
- logging and monitoring of access, tested backups and an incident-response procedure; and
- due diligence on the suppliers we use.

15. Security incidents and personal data breaches

If a security incident affects personal data, we will report it to CERT-In within the time required by its directions, notify the Data Protection Board of India and each affected individual where required by the DPDP Act, and notify any other data protection authority where required by the law that applies. Where the incident affects data we process for a client, we aim to notify the client within 72 hours of confirming the breach. If you suspect any misuse or loss of, or unauthorised access to, your data, please contact us immediately at privacy@virtuhostsupport.com.

Data Retention

16. We will only hold your personal data for as long as is necessary for the purpose for which it was collected,

or until you withdraw your consent, unless a longer period is required or permitted by law (for example, under tax and accounting laws, CERT-In directions or the rules made under the DPDP Act). When personal data is no longer needed, we will securely erase it and ensure that our Data Processors also erase it. Personal data we process for a client is kept, returned or deleted in accordance with our contract with that client.

Your Rights

17. You have the following rights in relation to personal data we hold as Data Fiduciary:

- Access – to confirm whether we process your personal data, and to obtain a summary of it, our processing activities and the parties with whom it has been shared.
- Correction, completion and updating – to have inaccurate, misleading or incomplete personal data corrected, completed or updated.
- Erasure – to have your personal data erased, unless we are required by law to retain it.
- Withdrawal of consent – where we rely on consent, to withdraw it at any time, as easily as you gave it.
- Grievance redressal – to have your grievances about our processing addressed by us.
- Nomination – to nominate another individual to exercise your rights in the event of your death or incapacity.
- Restriction, portability and objection – to restrict our processing, to receive your personal data in a portable format, and to object to processing (including for direct marketing). We extend these rights to everyone, not only where the GDPR requires them.

18. To exercise any of these rights, or to withdraw your consent, please contact us at privacy@virtuhostsupport.com.

We will verify your identity, acknowledge your request promptly and respond within 30 days, or within any shorter period required by law. We will not discriminate against you for exercising your rights. If we cannot comply with a request, we will explain why and tell you how to complain.

19. Grievance Officer

In accordance with the Information Technology Act, 2000 and the rules made under it, and the DPDP Act, the details of our Grievance Officer, who will address any discrepancies and grievances you have with respect to the processing of your personal data, are: Grievance Officer: HR Department, VirtuHost Support Private Limited, 401, City Point, Near Paras Circle, Nadiad, Kheda, Gujarat 387001, India. Email: HR@virtuhostsupport.com. We will acknowledge your grievance promptly and resolve it within one month of receipt, or within any shorter period required by law.

20. If you are not satisfied with our response, you may complain to the relevant authority:

the Data Protection Board of India (in the manner provided under the DPDP Act, once its provisions on complaints are in force); in the United Kingdom, the Information Commissioner's Office; or in the European Economic Area, the data protection authority where you live or work.

21. Your duties

Please keep us informed if your personal data changes. Under the DPDP Act, you must not provide false particulars, impersonate another person, or register false or frivolous grievances or complaints.

Cookies

22. This website uses only the cookies it needs to work, unless you agree otherwise.

Strictly necessary cookies (for example, to remember your cookie preferences) may be set without consent. Analytical or other non-essential cookies will only be set after you opt in through the website's cookie message, and you can change your choice at any time. We honour recognised browser-based opt-out signals, such as Global Privacy Control, where the law gives them effect. You can also block or delete cookies in your browser settings, although some features of the website may then not work as intended.

Links to Other Websites

23. This website may, from time to time, provide links to other websites.

We have no control over such websites and are not responsible for their content. This privacy policy does not extend to your use of such websites. Please read their privacy policies before using them.

General

24. Changes of business ownership and control

If all or part of our business is sold or transferred, personal data relevant to that part may be transferred with it where the Data Protection Laws permit, and may only be used by the new owner for the purposes for which it was originally supplied to us.

25. If any provision of this privacy policy is found to be invalid, illegal or unenforceable,

that provision will be deemed deleted to the extent required, and the remaining provisions will not be affected.

26. This privacy policy will be governed by and interpreted according to the laws of India.

Subject to any right you have to complain to the Data Protection Board of India or another data protection authority, the courts at Mumbai, Maharashtra will have exclusive jurisdiction over any dispute arising under this privacy policy.

Changes to This Privacy Policy

27. We may change this privacy policy to reflect changes in law, our services or our processing.

Any changes will be published on the website with a revised version and date, and significant changes will be notified to you where appropriate. We will not use a change to this policy to expand the processing of personal data already collected without any consent the law requires. You may contact us at info@virtuhostsupport.com or privacy@virtuhostsupport.com.