

Data Processing Annex

Annex to Section 11 (Data Protection) of the Cybrancee Terms of Service · Version 1.0 · Effective 14th October 2026.

This Annex sets out the details of processing required by Article 28(3) of the UK GDPR and, where it applies, the EU GDPR. Together with Section 11, it forms the data processing agreement between How About Group Ltd (trading as Cybrancee) as processor and the customer as controller. If this Annex and Section 11 conflict, this Annex applies.

1. Subject matter

Hosting of the customer's game servers, bot hosting and web hosting services, and related technical support.

2. Duration

For as long as the customer's services are active. When a service ends, its data is deleted. Web hosting backups are deleted within 30 days. Security logs are deleted within 180 days.

3. Nature and purpose

Storage and hosting of the customer's data. Automatic/Manual backups. Technical support when the customer asks for it. Security monitoring and abuse prevention needed to keep the platform running.

4. Types of personal data

Whatever personal data the customer chooses to store or process on their services. Typically: usernames and user IDs, IP addresses, contact details, messages, and log data. The customer decides what data is processed.

5. Categories of data subjects

The customer's end users, such as players, bot users and website visitors, and the customer's own staff or collaborators.

6. Special category data

Not intended. Under Section 11.8, the customer is responsible for having a legal basis before storing any special category data.

7. Instructions, including on transfers

The customer's documented instructions are: these Terms and this Annex, the settings the customer chooses in our control panels (including server location), and the customer's support requests.

8. Locations and transfers

- **Hosting:** data is stored in the location the customer selects when ordering, from the locations listed on our sub-processor page, and stays there unless the customer moves it.
- **Web hosting backups:** encrypted and stored with Google (Google Workspace), which may store data in the US or elsewhere. Covered by Standard Contractual Clauses in Google's Cloud Data Processing Addendum.
- **Transfers from the EU to us:** covered by the EU adequacy decision for the United Kingdom.
- **Support access:** our support team is based in the UK and in the Philippines and Venezuela. Access by contractors outside the UK is covered by the UK International Data Transfer Agreement (an Article 46 safeguard approved by the UK Information Commissioner), supported by a transfer risk assessment for each country.

9. Sub-processors

Our current sub-processors are listed at <https://cybrancee.com/legal/Sub-processor.pdf>.

10. Security measures

- Named staff accounts with two-factor authentication
- Staff open a customer's server only when the customer asks for help, or for a specific operational reason such as abuse or an outage
- Staff access is logged and reviewed monthly
- Contractors may not download, copy, store or screenshot customer data
- Web hosting backups are encrypted
- Security incidents are reported to us by staff within 24 hours. We notify affected customers without undue delay