Spotix Privacy Policy

Version 2026.12 · Effective 1 December 2026

At a glance

A summary for convenience. The full text below applies.

Topic	Summary	Section
Who we are	Cloud171 B.V. (Spotix), Helmond, the Netherlands	1
Scope	Your account, billing, support and website data, for which we are the controller. Data from your Microsoft 365 and Azure tenant are processed on your organisation's behalf under our DPA.	2
Where	Primarily in the EU (Germany and the Netherlands); traffic via Cloudflare's global network; some service providers in the US with safeguards	6
AI	Optional and off by default; your account data is not sent to our AI model provider	4.6
Selling data	We never sell personal data	5
Your rights	Access, rectification, erasure, restriction, objection, portability; complaint to the Dutch DPA	9
Contact	privacy@spotix.io	12

---

1. Who we are

This Privacy Policy explains how Cloud171 B.V., trading as Spotix ("**Cloud171**", "**we**", "**us**"), processes personal data as a controller.

Cloud171 B.V.
Steenovenweg 5, 5708 HN Helmond, the Netherlands
Chamber of Commerce: 91841755
Email: privacy@spotix.io

We have not appointed a data protection officer, as we are not required to do so. For all privacy questions, please contact privacy@spotix.io.

2. Scope: when are we the controller?

2.1 **We are the controller** for personal data that we process for our own purposes. This includes:

- data of users of the Spotix platform (account and login data);
- data of contact persons at our customers and prospects;
- billing data;
- support correspondence;
- data of visitors to our website;
- security and usage logs of the platform.

This Privacy Policy covers that processing.

2.2 **We are a processor** for personal data contained in the Microsoft 365 and Azure environments ("**tenants**") of our customers, which we analyse on their behalf (for example names, user principal names, group memberships and licence information of their employees). For that data, the customer is the controller, and our Data Processing Agreement (spotix.io/dpa) applies.

If you are an employee or guest user of one of our customers and have questions about your data in such a tenant, please contact that organisation. If you contact us, we will forward your request to the relevant customer.

3. Personal data we process

Category	Examples	Source
Account data	Name, business email address, organisation, role in the platform, authentication identifiers, MFA status	You or your organisation's administrator; our identity provider
Contact data	Name, business email address, telephone number, job title, organisation	You (for example via forms on our website), your organisation, or public business sources
Billing data	Company name, billing address, VAT number, billing contact, subscription and payment history. We do not store full card numbers.	You or your organisation; our payment provider
Support data	Contents of emails and support requests, and related correspondence	You
Technical and security data	IP address, browser and device information, login times, actions in the platform (audit log), error reports	Your use of the platform
Website data	IP address, pages visited, cookie identifiers (with your consent, see section 8)	Your visit to our website

4. Purposes and legal bases

4.1 Providing the platform to your organisation

Creating and managing accounts, authentication, access rights and communication about the service.
Legal basis:

- legitimate interests (Art. 6(1)(f) GDPR), namely our interest and that of your organisation in providing and using the service you are authorised to use;
- where you are yourself our contracting party: performance of a contract (Art. 6(1)(b)).

4.2 Billing and administration

Invoicing, payment processing and bookkeeping.
Legal basis:

- legal obligation (Art. 6(1)(c)), namely tax and bookkeeping obligations;
- legitimate interests (Art. 6(1)(f)).

4.3 Support

Answering your questions and resolving issues.
Legal basis: legitimate interests (Art. 6(1)(f)).

4.4 Security and abuse prevention
Protecting the platform, our customers and ourselves against unauthorised access, fraud and misuse, including audit logging and incident investigation.
Legal basis: legitimate interests (Art. 6(1)(f)).

4.5 Improving the service
Analysing the use of the platform in aggregated form, and diagnosing errors. Where possible we use anonymised or aggregated data.
Legal basis: legitimate interests (Art. 6(1)(f)).

4.6 AI features
The platform offers optional AI features, which are switched off by default and are enabled by your organisation's administrator. We do **not** send your account data (such as the name or email address of your Spotix account) to our AI model provider. Which data from your organisation's Microsoft 365 and Azure tenant may be sent when AI features are enabled is described in Annex I of our DPA. Neither we nor our AI model provider use your data to train AI models.

4.7 Service and product communications

- **Service notifications** (for example about changes, security or sub-processors) are sent to users of the platform.
- **Product updates and newsletters** about new features and related Cloud171 services are sent only to contacts at existing customers. You can opt out when you register, and every such message contains an unsubscribe link.
- We do not send marketing emails to people who are not customers unless they have given consent.

Legal basis: legitimate interests (Art. 6(1)(f)) and, for electronic marketing, the customer exception of Article 11.7(3) of the Dutch Telecommunications Act, or your consent.

4.8 Website analytics and lead insights

- We measure the use of our website with Cloudflare Web Analytics. This does not use cookies and does not track individual visitors.
- With your consent, we use HubSpot to record visits and interactions on our website, and to manage contacts and enquiries.

Legal basis: consent (Art. 6(1)(a)) for cookies and tracking, which you can withdraw at any time via the cookie settings. For managing enquiries in HubSpot: legitimate interests (Art. 6(1)(f)).

4.9 Legal obligations and disputes
Complying with legal obligations, and establishing, exercising or defending legal claims.
Legal basis:

- legal obligation (Art. 6(1)(c));
- legitimate interests (Art. 6(1)(f)).

We do not use automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you.

5. Sharing of personal data

We share personal data only where necessary for the purposes described above, with:

- **service providers** acting on our behalf (see the table below), under data processing agreements;
- **your organisation**, for example its administrators, who can see your account and activity in the platform;
- **professional advisers** (accountants, lawyers) under a duty of confidentiality;
- **authorities**, where we are legally required to do so;
- **an acquirer or successor**, if all or part of our business is transferred. We will inform you in that case.

We do not sell personal data and do not share it with third parties for their own marketing purposes.

Service provider	Purpose	Location	Safeguard for transfers
Clerk, Inc.	Authentication and user management	United States	EU-US Data Privacy Framework (certified); Standard Contractual Clauses as fallback
Stripe (Stripe Payments Europe, Limited, Ireland, and Stripe, LLC, United States)	Payment processing and invoicing	EU / United States	EU-US Data Privacy Framework (Stripe, LLC, certified); Standard Contractual Clauses as fallback. Stripe acts as an independent controller for certain processing, such as fraud prevention, anti-money laundering and know-your-customer checks.
Plus Five Five, Inc. (Resend)	Sending transactional emails	United States	EU-US Data Privacy Framework (certified); Standard Contractual Clauses as fallback
Functional Software, Inc. (Sentry)	Error monitoring	EU (Frankfurt) for error data; account metadata in the US	EU-US Data Privacy Framework (certified); Standard Contractual Clauses as fallback
Cloudflare, Inc.	Reverse proxy, DDoS protection and web application firewall for the website and platform (processes IP addresses and request data in transit)	Global network (US-based)	EU-US Data Privacy Framework (certified); Standard Contractual Clauses as fallback
Neon, LLC (Databricks)	Database hosting	EU (Frankfurt, Germany)	EU-US Data Privacy Framework (Databricks, certified) and Standard Contractual Clauses, for any support access from outside the EEA
Railway Corporation	Application hosting	EU (Amsterdam, the Netherlands)	EU-US Data Privacy Framework (certified) and Standard Contractual Clauses, for any support access from outside the EEA
HubSpot (HubSpot Netherlands B.V. / HubSpot, Inc.)	CRM, website forms and (with consent) website interaction tracking	EU (Germany); some data (such as usage analytics) is processed in the United States	EU-US Data Privacy Framework (HubSpot, Inc., certified); Standard Contractual Clauses as fallback
Cloudflare Web Analytics	Cookieless website statistics	See Cloudflare above	See Cloudflare above

6. International transfers

We store and process personal data primarily within the European Union (Frankfurt, Germany and Amsterdam, the Netherlands). Traffic to our website and platform passes through the global network of Cloudflare, and may be processed in transit outside the EEA. Some service providers are located in the United States. Where personal data are transferred outside the EEA, we ensure an appropriate safeguard under Chapter V GDPR:

- an adequacy decision of the European Commission, including the EU-US Data Privacy Framework for certified US companies; or
- the Standard Contractual Clauses adopted by the European Commission, with supplementary measures where necessary.

You can request a copy of the relevant safeguards via privacy@spotix.io.

7. Retention

Data	Retention period
Account data	For the duration of the account. After the subscription ends, during the retrieval period (30 days), then deleted within 30 days
Contact data of customers and prospects	For the duration of the relationship, plus 2 years
Billing data and invoices	7 years (Dutch tax retention obligation)
Support correspondence	2 years after the request is closed
Authentication logs (identity provider)	7 days
System logs (hosting)	30 days
Audit log in the platform (actions of users)	For the duration of the account; deleted together with the account data (see above)
Records of acceptance of the Terms (user, organisation, date and time, version, IP address)	For the duration of the account, plus 2 years
Error reports (monitoring)	Up to 90 days
Website data	Cookieless statistics: aggregated only. HubSpot tracking cookies: up to 6 months (see section 8). Contact and enquiry data in HubSpot: as for contact data above
Backups	Deleted in the normal rotation cycle, within 30 days

We may retain data longer where required to comply with a legal obligation or to establish, exercise or defend legal claims.

8. Cookies and similar technologies

8.1 **Platform.** The Spotix platform uses only functional cookies and similar technologies that are necessary for logging in, security and the operation of the platform. These include security cookies set by Cloudflare to distinguish legitimate visitors from bots (such as `__cf_bm` and `cf_clearance`). These do not require consent.

8.2 **Website.** Our website uses:

- **functional cookies**, which are necessary for the website to work and do not require consent;
- **Cloudflare Web Analytics**, which measures visits without cookies and without tracking individual visitors;
- **HubSpot cookies and scripts**, for analysing visits and interactions (such as `__hstc` and `hubspotutk`, up to 6 months; `__hssc`, 30 minutes; `__hssrc`, session). These are placed **only with your consent**, which you give through our cookie banner. You can change or withdraw your consent at any time via the cookie settings link in the footer of our website. Cookies that record your consent choice (such as `__hs_cookie_cat_pref`) are strictly necessary.

9. Your rights

Subject to the conditions of the GDPR, you have the right to:

- access your personal data (Art. 15);
- rectification of inaccurate or incomplete data (Art. 16);
- erasure (Art. 17);
- restriction of processing (Art. 18);
- data portability (Art. 20);
- **object** to processing based on legitimate interests (Art. 21). You can always object to direct marketing;
- withdraw consent at any time, where processing is based on consent (Art. 7(3)).

To exercise your rights, please contact privacy@spotix.io. We respond within one month. This period can be extended by two months for complex requests, in which case we inform you. We may ask you to verify your identity.

If your request concerns data in your organisation's Microsoft 365 or Azure tenant, see section 2.2.

You also have the right to lodge a complaint with a supervisory authority. In the Netherlands, this is the Autoriteit Persoonsgegevens (autoriteitpersoonsgegevens.nl). You can also complain to the supervisory authority in your country of residence or work.

10. Security

We take appropriate technical and organisational measures to protect personal data against loss and unauthorised processing. These include:

- encryption in transit and at rest;
- multi-factor authentication;
- role-based access control;
- logging and monitoring;
- an incident response procedure.

A description of our security measures for customer data is included in our DPA (Annex II).

Personal data breaches. If a personal data breach occurs involving data for which we are the controller, we will notify the Autoriteit Persoonsgegevens without undue delay and, where feasible, within 72 hours, unless the breach is unlikely to result in a risk to individuals. If the breach is likely to result in a high risk to you, we

will inform you directly. For breaches involving customer tenant data, we inform the customer concerned in accordance with our DPA. The customer, as controller, decides on any notification to authorities and data subjects.

11. Changes

We may update this Privacy Policy. We will announce material changes in advance by email or by a notice in the platform. The version and effective date at the top of this policy show when it was last changed. Previous versions are available via the version history.

12. Contact

For questions about this Privacy Policy or about your personal data:

Cloud171 B.V., trading as Spotix
Steenovenweg 5, 5708 HN Helmond, the Netherlands
privacy@spotix.io

Version history

Version	Date	Changes
2026.12	1 December 2026	Full revision: this policy now covers only processing for which Cloud171 is the controller (tenant data: see DPA); legal bases specified per purpose; retention periods; cookies; AI features (opt-in); breach notification clarified; transfer safeguards per provider.
2026.04	April 2026	First version.