Data Processing Policy

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Proxnum is the trading name of Neuroloud Networks and Technologies Limited, a company incorporated in Kenya.
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This Data Processing Policy describes how Neuroloud Networks and Technologies Limited ("Neuroloud", "we", "us", or "our"), trading as Proxnum, processes personal data in connection with https://proxnum.com and our virtual phone number / SMS verification services (the "Services").

It complements our Privacy Policy (https://proxnum.com/privacy-policy) and is intended for customers, payment partners, and other parties who need a clear statement of our processing practices.

1. Roles

- Controller âEUR" Neuroloud acts as controller for account registration, billing identity, support, fraud prevention, and analytics relating to Proxnum customers.
- Processor (limited) âEUR" where a business customer instructs us in writing to process data solely to deliver messaging on their behalf, we act as processor for that limited purpose.
- Sub-processors âEUR" we engage vetted providers (payments, hosting, messaging, email) under contractual confidentiality and security terms.

2. Categories of personal data

- Identity and account data (name, email, phone, billing address, hashed credentials)
- Transaction data (amounts, currency, timestamps, wallet balances, invoice references). Card numbers are handled by payment providers; we do not store full PAN or CVV
- Service and messaging metadata (allocated numbers, activation IDs, delivery status, message content needed to provide the Service, related logs)
- Technical data (IP address, browser/device information, approximate location from IP, cookies/session IDs, security logs)
- Support content you send to us

3. Purposes and legal bases

- Account administration and delivery of virtual numbers / OTP messages âEUR" contract
- Payments, refunds, and anti-fraud checks âEUR" contract, legitimate interests, and/or legal obligation
- Customer support and service notices âEUR" contract / legitimate interests
- Platform security, abuse prevention, and sanctions / payment-network compliance âEUR" legitimate interests / legal obligation
- Reliability and product improvement (including aggregated analytics) âEUR" legitimate interests; consent where required for non-essential cookies

4. Processors and transfers

Personal data may be processed by trusted service providers for payments, hosting, messaging, email delivery, and analytics (configured with privacy controls). These providers may only process data as needed to perform their services for us.

Neuroloud is incorporated in Kenya and operates Proxnum primarily from Kenya. Where data is transferred internationally (including EEA/UK data), we use appropriate safeguards such as Standard Contractual Clauses and processor contracts, as described in the Privacy Policy.

5. Retention

- Account data âEUR" while the account is active and for a limited period afterward for disputes, accounting, and legal compliance
- Message / activation logs âEUR" typically up to 12 months for support and abuse investigation, unless law requires longer
- Payment records âEUR" as required for tax, accounting, and payment-partner obligations

6. Security

- TLS encryption for data in transit (HTTPS)
- Access controls, authentication, and least-privilege administration
- Logging and monitoring for security and fraud events
- Contractual security and confidentiality obligations for sub-processors
- Periodic review of payment and infrastructure security settings

7. Restricted jurisdictions

Payments from sanctioned or restricted jurisdictions are not accepted. You must not use the Services if you are located in, or accessing them from, a sanctioned or restricted jurisdiction. Access or payments that appear to involve such jurisdictions may be declined or blocked.

8. Your rights

Subject to applicable law (including GDPR for EEA/UK users and Kenya’s Data Protection Act), you may have rights to access, rectify, erase, restrict, or object to processing, and to data portability. Contact us using the details below. We respond within the timeframes required by law.

9. Changes

We may update this policy from time to time. Material changes will be shown by updating the "Last updated" date on this page.

10. Contact

Neuroloud Networks and Technologies Limited (trading as Proxnum)

Email: helol@proxnum.com / support@proxnum.com

Website: https://proxnum.com