EMBERION DIGITAL LLC

VENDOR RISK ASSESSMENT: HOSTINGER

AI GOVERNANCE REVIEW

Risks and Rewards: Scope-Based Adoption

Prepared for Emberion Digital, LLC

REWARDS ◆ **RISKS** ◆ **GUARDRAILS** ◆ **DECISION**

Vendor Assessment | October 20, 2026

www.emberiondigital.com
djones@emberiondigital.com

Vendor Risk Assessment: Hostinger

Prepared for	Emberion Digital, LLC
Subject	Risk-scoped adoption assessment: Hostinger web hosting, domains, email, and AI Agents
Date	October 20, 2026
Purpose	Give Emberion Digital a defensible, documented position on the risks and rewards of using Hostinger for its own business, including its AI Agents, so it can speak to both with clients.

Bottom Line

Hostinger is a reasonable low-cost choice for Emberion Digital's public website, domains, and light AI-assistant work. It is not an environment for client work product, CUI, or federal contract data. Two items should be settled in writing before relying on the AI Agents: Hostinger's published statements on whether conversations train AI models conflict, and no Data Processing Agreement was found.

1. Executive Summary

Hostinger is a low-cost hosting and domain provider that has added AI agent products: Hostinger Agent (a business assistant), OpenClaw and Hermes Agent plans, a Connector for AI coding tools that can deploy projects and update DNS, and Agentic Mail. Its published security baseline is credible for its class: ISO/IEC 27001:2022 certification, PCI DSS and GDPR listings, and documented monitoring, scanning, and disclosure practices. The company has also had two publicly reported security incidents, and its Terms place many responsibilities on the customer: backups, account security, and the actions an AI takes in your account.

As with any vendor, the governance question is what data will touch it and what its agents are allowed to change. Used for Emberion Digital's own public marketing, domains, and low-sensitivity assistant tasks, the residual risk is low to moderate and manageable. Used for anything touching client deliverables, CUI, or contract data, the risk profile changes entirely.

2. Rewards: What You Get

REWARD	WHAT THE VENDOR PUBLISHES
Low entry cost	Hostinger Agent starts at $6.99/month with 1,000 credits that refresh monthly. The OpenClaw and Hermes Agent plan starts at $5.99/month and renews at $11.99. [5]
Recognized security baseline	ISO/IEC 27001:2022 certification, with PCI DSS v4.0.1 and GDPR listed on the Trust Center. [1]
One vendor for site, domain, mail, and agents	The Hostinger Connector is free with an active hosting plan, and Agentic Mail is included with every Hostinger email plan. [5]
Human approval gates	Agents pause and ask for approval before irreversible actions, run in isolated setups with credentials hidden by default, and can be disconnected at any time. [5]
Privacy rights	Access, correction, portability, erasure, restriction, and objection rights, with a privacy contact at gdpr@hostinger.com. [2]
Refund window	Most refundable products can be refunded within 30 days, and renewals restart the window. [4]

3. Vendor Findings

Sources: Hostinger's Trust Center, Privacy Policy, Terms of Service, Refund Policy, and AI Agents page [1] to [5], plus a Hostinger support article and press coverage of incidents [6] to [9]. Hostinger's own pages were re-read on October 20, 2026.

AREA	FINDING
Certifications	ISO/IEC 27001:2022 certified. PCI DSS v4.0.1 and GDPR are listed on the Trust Center. No SOC 2 report was found. Hostinger states hosting is not intended to be HIPAA-compliant. [1] [6]
Security practices	Hostinger states 24/7 server monitoring, firewalls, anti-malware, vulnerability scanning and penetration testing, regular backups, a responsible disclosure policy with a bug bounty program, and internal two-factor authentication. The Trust Center gives no testing or bounty details. [1] [6]
Incident response	The Trust Center lists an Incident Response Standard and business continuity topics, with no detail. The Privacy Policy does not describe how Hostinger notifies customers of its own breaches. [1] [2]
Breach history	**August 2019:** about 14 million customer accounts were affected after attackers reached an API server. Exposed data was usernames, emails, first names, IP addresses, and hashed passwords (SHA-1, per Hostinger). Hosted websites, domains, and email were reported untouched, and passwords were reset. [7] **2025:** Hostinger detected suspicious activity on a shared hosting server on December 1, 2025. Only text saved in its Notepad feature was accessed, per secondary reporting that cites Hostinger's February 3, 2026 disclosure. [8] **Unverified:** a commercial breach-intelligence listing claims a late-2015 leak of about one million Hostinger accounts. It offers no evidence or Hostinger confirmation, so it is not treated as established. [9]
Data location and transfers	Data may be held in the UK, Netherlands, Lithuania, Cyprus, and other jurisdictions. Some servers are outside the EU/EEA, including the US, Brazil, Singapore, and Indonesia, with transfers relying on GDPR safeguards such as standard contractual clauses. The Trust Center names no data center locations. [1] [2]
DPA and sub-processors	No Data Processing Agreement was found on the Trust Center or site footer. The Privacy Policy names some providers (Ravelin, iDenfy, Google Analytics, and others for specific products) and refers to AI service providers. A full current sub-processor list was not found. [1] [2]
AI training and data use	**Conflicting statements.** The Agents page says conversation data is never used to train AI models or shared for advertising. The Terms' AI services clause says Hostinger may store and use input and output to provide and improve services, including machine learning training. The Privacy Policy does not say whether chats train models and has nothing specific on Agents. [2] [3] [5]
AI Agent controls	Agents act only within connected accounts and tools, and pause for approval before irreversible actions. The Connector can deploy projects and update DNS. Under the Terms, you are responsible for actions the AI takes in your account or connected integrations. [3] [5]
Liability	Direct damages only. Lost business, data loss, third-party conduct, customer content, and AI output are excluded. Total liability is capped at the lesser of fees paid in the prior 12 months or EUR 10,000. [3]
Backups	You are solely responsible for backing up all content, including email. Hostinger does not warrant that it backs up your account. [3]
Suspension and termination	Hostinger may deny, suspend, lock, or modify accounts or services at its sole discretion, and may act without notice for certain violations, failed payments, or chargebacks. [3]
Uptime commitment	The Terms contain no uptime guarantee. Any guarantee is defined in service-specific documents. [3]
Governing law	Luxembourg law and courts, unless mandatory local law applies. The contracting Hostinger entity depends on your country of residence. [3]

AREA	FINDING
Refunds	Most refundable products: 30 days. New domain registrations: 96 hours, and many country-code domains are not refundable. The AI Builder Agentic plan: 30 days if fewer than 30 prompts were used. Refund terms for Hostinger Agent and OpenClaw / Hermes Agent plans were not found. [4]

Read as-is, Hostinger is a credible, low-cost provider with a documented security baseline and a customer-heavy Terms of Service. It is not positioned or certified for regulated, federal, or CUI-adjacent workloads, and does not claim to be.

4. Risk Assessment

RISK	SEVERITY IF UNSCOPED	SEVERITY IF SCOPED TO PUBLIC SITE AND ADMIN	NOTES
CUI / federal / client data on the platform	**High**	**Low / None**	The Trust Center lists ISO 27001, PCI DSS, and GDPR, and no FedRAMP, CMMC, NIST 800-171, or SOC 2 attestation. Client deliverables, contract data, and agency correspondence should never be hosted, mailed, or pasted into agent chats here.
AI training and data-use terms	**Medium to High**	**Low**	The Agents page and the Terms disagree. Until Hostinger confirms in writing, assume inputs and outputs may be used for service improvement and keep confidential material out.
Agent actions on live infrastructure	**Medium to High**	**Low to Medium**	Agents and the Connector can change DNS, domains, and websites. Approval prompts help, but the Terms make you responsible for what the AI does in your account.
Breach history and credential risk	**Medium**	**Low to Medium**	A 2019 account-database breach and a 2025 shared-server incident. Mitigate with a unique password, two-factor authentication, and no secrets in chat.
Data loss and backups	**Medium to High**	**Low to Medium**	The Terms put backup responsibility on you and exclude data loss from liability. Keep independent backups of site, email, and content.
Suspension and single-vendor dependency	**Medium**	**Medium**	Hostinger can suspend at its sole discretion. If domain, email, site, and agents share one account, a suspension takes all of them offline.
Data residency, transfers, and no DPA found	**Medium**	**Low**	Matters mainly if you process personal data for others. Request a DPA and a hosting location confirmation before that happens.
Liability cap and no uptime commitment	**Medium**	**Low to Medium**	Liability is capped at the lesser of 12 months of fees or EUR 10,000, with no uptime guarantee in the Terms. Do not host anything where an outage carries contractual consequences for a client.
Credibility and optics	**Medium**	**Low**	You advise on AI vendor governance. Running an agent platform whose training terms you have not reconciled is hard to defend. Document the decision and the open questions.
Refund exposure on AI plans	**Low to Medium**	**Low**	Refund terms for Hostinger Agent plans were not found. Start on the shortest term and confirm.

5. Recommended Guardrails (If Adopting)

1. **Hold the data boundary.** Hostinger hosts Emberion Digital's public website and marketing, domains, and business email. No client work product, CUI, contract data, or personal data about clients' people goes into Hostinger hosting, mail, or agent chats.
2. **Treat agent chats as non-confidential** until the training question is settled in writing. Never paste passwords, API keys, payment details, or other secrets, because agents can act on connected accounts.
3. **Lock the account.** Use a unique password, two-factor authentication, and a dedicated admin email, and turn on domain locking where it is offered.
4. **Keep your own backups** of site files, databases, email, and DNS records, stored outside Hostinger on a schedule.
5. **Limit and review agent permissions.** Connect only the tools you need, approve each irreversible action yourself, test on a non-critical domain or staging site first, and disconnect tools when idle.
6. **Human review on anything published or sent.** Agent output is a first draft; the Terms disclaim its accuracy and originality.
7. **Document the decision and revisit in 90 days.** Re-read the Terms and Privacy Policy, since the AI services clauses are new and changing, and confirm the tool is saving time rather than adding oversight.

6. Questions to Put to Hostinger in Writing

1. Are Hostinger Agent conversations ever used to train or improve AI models, given the AI services clause in the Terms of Service?
2. Is a Data Processing Agreement available to business customers who process personal data?
3. Which data center location serves my hosting plan, and can I choose it?
4. What are the refund terms for the Hostinger Agent and OpenClaw / Hermes Agent plans?

Keep the written replies with this assessment as part of your risk-acceptance record.

7. Bottom Line

The rewards are real: low cost, a recognized security baseline, and one place for site, domain, mail, and agents. The risks are mostly about scope and terms rather than the platform itself: a conflicting AI training position, customer-borne backup and account responsibility, and AI actions that can touch live infrastructure. Scoped to Emberion Digital's own public presence and low-sensitivity assistant work, Hostinger is a defensible choice. The moment client data, CUI, or contract information is involved, it is the wrong place, which is the same boundary you would tell any client to draw around any vendor.

Terms of Use and Disclaimer

This assessment is provided for informational purposes only. It is based on the vendor's published documentation and press coverage, is not a technical security audit, and does not constitute legal, regulatory, or compliance advice. Vendor terms and certifications change; re-verify before relying on them. Emberion Digital, LLC makes no representations or warranties, express or implied, about any third-party tool named here.

Citations & Sources

Vendor statements were checked against Hostinger's live pages on October 20, 2026. They reflect what Hostinger publishes, not an independent audit. Items [8] and [9] are third-party sources and are labeled as such.

[1] Hostinger. Trust Center.

ISO/IEC 27001:2022, PCI DSS v4.0.1 and GDPR listings, incident response topics, sub-processor notice. No DPA, SOC 2, or data center locations listed.
https://trust.hostinger.com/

[2] Hostinger. Privacy Policy.

Data collected, retention, international transfers, data jurisdictions, GDPR rights, AI Memory. No statement on whether chats train models.
https://www.hostinger.com/legal/privacy-policy

[3] Hostinger. Universal Terms of Service Agreement.

Liability cap, backup responsibility, suspension rights, no uptime guarantee, Luxembourg law, AI services clause including machine learning use of input and output.
https://www.hostinger.com/legal/universal-terms-of-service-agreement

[4] Hostinger. Refund Policy.

30-day standard window, domain and VPS exceptions, AI Builder Agentic plan terms.
https://www.hostinger.com/legal/refund-policy

[5] Hostinger. Agentic AI (AI Agents).

Agent products and pricing, approval gates, isolation, Connector capabilities, statement that conversation data is not used for training.
https://www.hostinger.com/agentic-ai

[6] Hostinger Support. What security measures does Hostinger use?

Monitoring, firewalls, anti-malware, scanning and testing, backups, disclosure and bug bounty, ISO 27001, HIPAA statement.
https://www.hostinger.com/support/1583287-what-security-measures-does-hostinger-use/

[7] Sophos News. Hostinger upgrades password security after 14M accounts breached (August 27, 2019).

Scope, access method, exposed data, SHA-1 hashing, and Hostinger's response to the 2019 breach.
https://news.sophos.com/en-us/2019/08/27/hostinger-upgrades-password-security-after-14m-accounts-breached/

[8] HostScore. Hostinger discloses limited unauthorized access to Notepad feature (secondary source).

Summary of the 2025 shared-server incident, citing Hostinger's February 3, 2026 disclosure. Hostinger's original post was not retrieved.
https://hostscore.net/news/hostinger-discloses-limited-unauthorized-access-to-notepad-feature/

[9] HEROIC. Hostinger breach listing (unverified, commercial breach-intelligence vendor).

Claims a late-2015 leak of about one million accounts. No evidence or Hostinger confirmation provided.
https://heroic.com/darkhive-breaches/hostinger-breach-998676-plaintext-passwords-exposed/