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<b>Classification:</b> Restricted	<b>Approved by:</b> Stuart Ladbroke	<b>Date:</b> 13/01/2026
<b>Title:</b> Privacy Policy		

# Privacy Policy


Onwave UK Ltd (Onwave or we or us) are committed to protecting and respecting your privacy. This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Information is collected by Onwave which is registered with the United Kingdom's Information Commissioner's Office as a data controller in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We also take account of relevant privacy and data access legislation in the UK, including the Data (Use and Access) Act 2025, and any subsequent amendments or successor legislation.

## Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in forms on our site, through our online portals and platforms, including OWL. This includes information provided at the time of registering to use our site, subscribing to our services, posting material or requesting further services. We may also ask you for information when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site, online portals, platforms (including OWL), and/or services and of the fulfilment of your orders.
- Details of your visits to our site and use of our online portals and platforms, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
- Personal data that our customers enter into OWL or other Onwave platforms, which may include personal data relating to their employees, end users, or other third parties. In

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such circumstances, the customer is responsible for ensuring that they have a lawful basis for providing that personal data to us, and we act as a data processor in accordance with our contractual obligations and applicable data protection legislation.

### **IP Addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers (although we currently have no advertisers or plans to utilise advertisers in the future). This is statistical data about our users' browsing actions and patterns and does not identify any individual.

### **Cookies**


Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. Where required by law, we will obtain your consent before placing non-essential cookies on your device, in accordance with the Privacy and Electronic Communications Regulations (PECR). You can manage or withdraw your cookie preferences at any time through our cookie management tool.

### **Where we store your Personal Data**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **User responsibilities and Account Security**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site and/or services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. You are also responsible for ensuring that your login details are used only by authorised individuals and for notifying us immediately if you believe your password or account has been compromised.

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## Security of Personal Data and Breach Management

We have implemented appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office (ICO) without undue delay and, where required, within 72 hours of becoming aware of the breach, in accordance with UK GDPR.

Where required by law, we will also notify affected individuals without undue delay and take appropriate steps to mitigate any potential adverse effects.

## Transfer of Personal Data overseas


As the internet is a global environment, the collection and processing of personal data may involve transfers of personal data outside the United Kingdom. Where personal data is transferred outside the UK to a country that does not benefit from an adequacy decision, we ensure that appropriate safeguards are in place in accordance with UK GDPR. These safeguards may include the use of the UK International Data Transfer Agreement (UK IDTA) or the UK Addendum to the EU Standard Contractual Clauses, together with additional technical and organisational measures where required.

We will not transfer personal data internationally unless we are satisfied that appropriate protections are in place to safeguard individuals' rights and freedoms.

## Uses made of the information

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between your business or Employer, you and us.

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- To allow you to participate in interactive features of our service, when you choose to do so.
- To validate who you are when you call to discuss products or services that are provided to you or your Employer and where we need to verify who you are in terms of authority to take instruction.
- To notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you. We and they may contact you about these by post or telephone; although we have never done this before and have no plans to do so in the future.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.


If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form or registration form) or contact us at [gdpr@onwave.com](mailto:gdpr@onwave.com).

## Data Retention

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, contractual, accounting, or reporting requirements.

Retention periods vary depending on the nature of the personal data and the purpose for which it is processed. Where personal data is no longer required, it will be securely deleted or anonymised in accordance with our data retention and disposal procedures.

Where we process personal data on behalf of our customers as a data processor, personal data will be retained in accordance with the relevant customer contract and our documented instructions, unless a longer retention period is required by law.

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## Disclosure of your information

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Onwave's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](#) and other agreements; or to protect the rights, property, or safety of Onwave, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- We may need to share data with Suppliers when we place orders on your behalf or when we register licences or products on your behalf.

## Your rights


You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [gdpr@onwave.com](mailto:gdpr@onwave.com).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## Access to information

Under UK GDPR, you have the right to request access to the personal data we hold about you (commonly known as a Subject Access Request). These requests will be handled in accordance with applicable data protection legislation.

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Access requests will normally be provided free of charge. However, where a request is manifestly unfounded or excessive, particularly if it is repetitive, we may charge a reasonable administrative fee or refuse the request, as permitted by law.

### Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

### Companies

In accordance with GDPR, the company referred to within this policy is:

Onwave UK Ltd, 4 Abbey Wood Road, Kings Hill, West Malling, ME19 4AB

### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [gdpr@onwave.com](mailto:gdpr@onwave.com).



**Stuart Ladbrook**

**Chief Executive Officer**

13/01/2026