



GDPR 2020 PRIVACY NOTICE

Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

Onward Holdings Ltd, Onyx Retail Park and Green Door Self Store, which hereafter for the purposes of this Privacy Notice will all be referred to as Onward Holdings, are pleased to provide the following information:

Who we are

Onward Holdings is a provider of self-managed storage, managed warehousing, leased warehousing, retail units and development sites, mostly to the B2B sector.

Personal Data

Onward Holdings uses the information collected from you to provide quotations, make telephone contact and to email you information which the company believes may be of interest to you and your business. In you making initial contact you consent to Onward Holdings maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services. Onward Holdings may occasionally also act on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Onward Holdings will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses. Onward Holdings may, from time to time, use such information to identify its visitors. Onward Holdings may also collect statistics about the behaviour of visitors to its website.

Onward Holdings' website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WordPress.org uses cookies to help Onward Holdings identify and track visitors and their website access preferences. Onward Holdings' website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Onward Holdings' website.

Our different sites deploy CCTV cameras for staff safety and security purposes. These cameras are managed by various operators who, for the purposes of GDPR, are acting in the capacity of processor. CCTV footage is only retained for a maximum of three months. For more information and access to this footage please email the dpo@onwardholdings.com or telephone +44 (0) 1977 614007.

Any information Onward Holdings holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies.

Onward Holdings will only collect the information needed so that it can provide you with the services it provides, the business does not sell or broker your data, although coincidentally there may be times when your information could be contained in data that Onward Holdings has coincidentally purchased from a third-party list broker.

Legal basis for processing any personal data

To meet Onward Holdings' contractual obligations and to respond to business enquiries.

Legitimate interests pursued by Onward Holdings and/or its other entities

To promote the warehousing, storage, retail units and other assets such as development sites offered by Onward Holding.

Consent

Through agreeing to this privacy notice you are consenting to Onward Holdings processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing dpo@onwardholdings.com or by phoning +44 (0) 1977 614007 or writing to us, see last section for full contact details.

Disclosure

Onward Holdings may on occasions pass your Personal Information to third parties exclusively to process work on its behalf. Onward Holdings requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. Onward Holdings do not broker or pass on information gained from your engagement with the company without your consent. However, Onward Holdings may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. The business may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Onward Holdings, its clients and/or the wider community.

Retention Policy

Onward Holdings will process personal data during the duration of any contract and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years any personal data not needed will be deleted.

Data storage

Data is held in the United Kingdom using different (multiple) servers. Onward Holdings does not store personal data outside the EEA.

Your rights as a data subject

At any point whilst Onward Holdings is in possession of or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Onward Holdings refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

At your request Onward Holdings can confirm what information it holds about you and how it is processed.

You can request the following information:

- Identity and the contact details of the person or organisation (Onward Holdings) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Onward Holdings and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

To access what personal data is held, identification will be required

Onward Holdings will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Onward Holdings is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to dpo@onwardholdings.com or by phoning +44 (0) 1977 614007 or writing to us at the address further below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Onward Holdings or its processors, you have the right to complain to Onward Holdings' financial director. If you do not get a response within 30 days you can complain to the ICO.

The details for each of these contacts are:

Onward Holdings Ltd, attention of the Financial Director
Phoenix Avenue, Green Lane Industrial Park, Featherstone, WF7 6EP.
Telephone +44 (0) 1977 614007 or email dpo@onwardholdings.com

ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF
Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>