

DATA PRIVACY & PROTECTION POLICY

Document Ref: GDPR-POL-01 | Effective Date: September 2026 | Version: 2.4 | Status: Approved

Onnytech LTD ("we," "our," or "us") is dedicated to safeguarding the privacy, confidentiality, and data sovereignty of our clients, engineers, industrial site operators, and web visitors. This Privacy Policy details how personal information is collected, processed, protected, and retained across our public domain (onnytech.co.uk) and our authenticated Client and Engineer service portals.

We operate strictly under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. We collect only the minimum data strictly required to deliver our turnkey automation, control systems, and anaerobic digestion engineering services.

1. Categories of Information Collected

- **Account Identification Data:** When portal accounts are provisioned, we store the user's Full Name, Professional Email Address, Assigned System Role (Administrator, Field Engineer, or Client Representative), Plant Affiliation, and account activation timestamps.
- **Passkey Authentication Credentials:** To provide secure passwordless authentication, our systems store public cryptographic keys and unique credential identifiers. *Biometric identifiers (such as fingerprints or facial scans) remain strictly confined within your personal device hardware and are never transmitted to, collected by, or accessible to Onnytech.*
- **Hardware Session Verification Keys (DBSC):** On supporting browsers, an ephemeral public key generated by your device's hardware enclave (TPM) is held in transient server session memory to verify request origin. This key contains zero personally identifiable data and is wiped immediately upon session expiry.

2. Automated Telemetry & Access Logging

- **Privacy-Preserving Access Logs:** General web requests log anonymised IP addresses (the final octet of IPv4 and last 64 bits of IPv6 addresses are cryptographically zeroed out prior to storage), HTTP request methods, accessed URIs, and server response codes to analyze server health.
- **Administrative Security Audit Trails:** Sensitive modifications within the management portals (such as user account provisioning, role adjustments, and plant configuration updates) record full administrative IP addresses and timestamps under our legitimate interest of accountability, fraud deterrence, and statutory compliance.
- **Zero External Data Leakage:** All platform assets, stylesheets, scripts, and typography are hosted self-contained on our secure first-party infrastructure. We load no external tracking pixels, social plugins, or third-party web analytics libraries.

3. Purposes & Lawful Bases for Processing

Under UK GDPR Article 6, we process personal data strictly to deliver contracted engineering services and maintain platform integrity:

- **Contractual Performance:** Providing authenticated access to plant telemetry, generating maintenance sheets, dispatching job reports, and processing engineering billing.
- **Legitimate Interests:** Protecting platform integrity, enforcing rate-limiting, preventing unauthorized access, and maintaining immutable audit records.
- **Statutory Compliance:** Fulfilling UK legal obligations, health and safety records, accounting mandates, and regulatory disclosures.

4. Information Sharing & Disclosures

Onnytech is a private B2B industrial engineering firm. **We never sell, rent, monetize, or disclose personal data to third parties, advertisers, or marketing brokers.** Disclosures are limited strictly to:

- **Assigned Field Personnel:** Authorized engineers and site managers requiring plant schematics and site contact details to execute physical works.
- **Legal Obligations:** Compliance with UK statutory law, judicial court orders, or law enforcement investigations concerning verified security incidents.

5. Data Retention & Secure Disposal

Personal account records and associated service logs are retained strictly for the duration of the commercial engineering contract. Following account decommissioning or contract conclusion, identifiable records are archived in accordance with statutory accounting retention periods (typically 6 years) or securely sanitized using cryptographic deletion protocols.

6. Your Data Subject Rights (UK GDPR)

Under UK data protection legislation, you possess statutory rights to access, rectify, or erase your personal data, restrict or object to processing, and request data portability. You also maintain the right to lodge a formal complaint with the UK Information Commissioner's Office (ICO). To exercise any statutory data rights, please contact our Data Protection Office.

7. Hosting Infrastructure & Security Contact

All Onnytech platform databases and file assets reside within sovereign data centres located in the United Kingdom, governed by stringent technical and physical access controls. For privacy inquiries or rights requests:

Data Protection & Governance Office — Onnytech LTD
Privacy Inquiries: info@onnytech.co.uk | Telephone: 01588 650537
Postal Address: Old Farm, Wentnor, Bishops Castle, Shropshire, SY9 5EE, United Kingdom