

1. INTRODUCTION

Onca Technologies Limited (Onca Technologies) want to ensure that you, as a user of our services, understand how we handle the data we collect about you. This privacy policy describes what data we collect, how we do it, and what we use the data for.

Onca Technologies Limited is registered in Scotland under company number SC536446 with the registered address of 6 Laverock Road, Ellon, Aberdeenshire, AB41 6FN.

2. PRIVACY

Personal information is data and assessments that can be linked to an individual. For example, this could be name, place of residence, telephone number, e-mail address and IP address, or a combination of these that make it possible to estimate which person is behind the data.

All use of personal data is considered as processing of personal data, such as collection, registration, compilation, storage and disclosure or a combination of these. The processing of personal data is regulated by the UK GDPR (General Data Protection Regulation) and EU GDPR.

Onca Technologies is responsible for the processing of personal data processed in connection with the use of our services and products, and the personal data we collect and process for the purpose stated below. The requirement for Onca Technologies as a Data Controller and Data Processor (for client data) primarily means that it is Onca Technologies who has responsibilities and obligations under the GDPR.

If Onca Technologies chooses another company as responsible for processing personal data, i.e., data about you, then we call that supplier a data processor. In cases where we use data processors, we must ensure that we have entered into data processor agreements that regulate how the data processor can process data that is made available to them. The standard for this is that the agreement with the data processor may only process personal data on Onca Technologies' behalf and for clearly defined purposes, as the GDPR's regulations require.

3. HOW WE COLLECT INFORMATION ABOUT YOU

Most of the data we have about you is data generated when you use any of our services. Examples of this may be page views and information about your device (through website cookies), or data you provide us via

regular mail, email, telephone, and any other communication methods for the purposes of providing our services.

3.1. Information you yourself share with us

We collect personal information when you provide it to us:

- When you visit our website
- When you fill in a form on our website, you will enter some data that is stored with us. This information is stored in our databases so that we can respond to your contact request.
- when you contact us by phone, email or in writing.
- when you use post or react to our social media channels
- when you order goods or services from us, or for the purposes of quoting, entering and performing a contract.

3.2. Information collected through the use of the services

When you use our services, we will record that information about what services you use and how you use them. We do this because we then have the opportunity to improve the user experience, service content, prevent fraud and adapt content to the benefit of our customer's experience.

3.3. Information from other sources

We receive information from other sources, such as networks, business partners, customers, targeting tools, or other third parties, to help us or them understand user patterns, your preferences, or generally to improve the services we offer to better suit your needs and interests.

3.4. Lawful bases for processing

We process personal data under the following legal bases under Article 6 of UK GDPR:

- **Contractual necessity** – when data is needed to fulfil a contract (e.g., customer accounts, service provision).
- **Legitimate interest** – for business operations (e.g., fraud prevention, marketing to existing customers).
- **Legal obligation** – when required to comply with applicable laws.
- **Consent** – where you have explicitly agreed to certain processing activities (e.g., direct

marketing if no pre-existing customer relationship exists).

3.5. Data storage and retention

Your personal data is stored by the Onca Technologies on its cloud-based database management services and SaaS (Software as a Service) applications that we use to deliver our services. The company retains service data for the duration of the customer's business relationship with Onca Technologies and for a period of time thereafter, to analyze the data for our own operations, and for historical and archiving purposes associated with our services.

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to comply with legal, regulatory, tax, accounting, or reporting requirements.

A full breakdown of our data retention periods, including the types of data we process and how long we retain them, is available in the [Onca Public Privacy Portal](#).

After these periods, personal data is securely deleted unless a valid legal basis exists for continued retention (e.g., legal claims or regulatory obligations).

4. COOKIES

Onca Technologies uses cookies to ensure that functions and services on our website function properly. Our full cookie policy is outlined on the website and is available from the [Cookie Policy](#).

Cookies are small data files transferred onto computer or device browsers to keep a record of your history while using a particular website and to enhance functionality on our site.

The cookies collect information such as the number of visitors to the site, which pages they visited and whereabouts they came to the site from. This information is anonymous and cannot be used to identify you personally.

Cookies are stored on your individual device and you have full control over their use. As a user, you can delete the cookie and the information that it gathers at any time using the settings in your internet web browser.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. Should you visit our site with cookies deactivated, you may not be able to use all of the functions on our site to the full extent.

For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser

5. HOW WE MIGHT SHARE THIS INFORMATION

In some cases, we may share information with affiliates who use the information to convey targeted content and / or offers through their services. We then enter into agreements that restrict access to the use of the information and establish obligations to comply with applicable privacy laws.

If it is suspected that there has been a criminal offense in connection with the use of services, the information may be disclosed to public authorities upon request.

We will not share, sell or disseminate personal information in any way other than as described in this privacy statement.

6. THIRD PARTY WEBSITES

We may sometimes provide a link to third party websites from our site.

We do not control these third-party websites (including whether or not they store cookies).

This privacy policy applies only to our website and services, so we encourage you to read the privacy policy on the other websites you visit and contact the website owner if you have any concerns or questions.

7. HOW WE USE THE INFORMATION WE HAVE GATHERED ABOUT YOU

7.1. Onca Technologies is constantly working to provide you with the best possible experience of our services available at all times. In order to do so, we use, among other things, personal information we have collected.

We collect personal data to understand and improve our services and products so that you get the best user experience on our sites, to enable us to supply you with the relevant services and support you have requested from us, and to contact you in relation to any enquiries or requests you raise with us.

7.2. We may compile statistics and survey market trends to improve and further develop our website or services.

- 7.3. If you have an active customer relationship with us, we will be able to send you email marketing or other electronic communication methods unless you have asked us otherwise.

If you contact us with regards to our services, we may contact you from time to time at a later date in relation to your initial enquiry, even if you decide not to enter into a contract with us. You can ask us not to contact you further at any time by contacting us via the [Data Protection Query](#) or a direct email to one of our team members.

If you do not have an active customer relationship with us, we will only send such marketing if you have given us explicit and informed consent or on the basis of legitimate interest.

8. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with other parties as set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

9. THIRD PARTY SERVICES & INTERNATIONAL DATA TRANSFERS

Some of our third-party service providers process personal data outside the UK and EEA. Where this occurs, we ensure that appropriate safeguards, such as Standard Contractual Clauses (SCCs) or UK International Data Transfer Agreements (IDTAs), are in place to protect your data.

A full list of third-party service providers, including their privacy policies, can be found in the 'Onca

Technologies Third-Party Service Providers' section of our [Onca Public Privacy Portal](#).

10. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

11. CHILDREN'S PRIVACY

We do not knowingly attempt to solicit or receive information from children. Onca Technologies does not wish to collect or otherwise process personal information about children (under 16 years of age).

If children under 16 have still provided us with personal information, we will delete the information as soon as we become aware of this.

If you are under 16, please do not provide any personal information to us. If you provide us with your data, you confirm that you are over the age of 16.

12. JOB APPLICATIONS

Onca Technologies is the data controller for the information you provide during job applications unless otherwise stated. The information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

All the information that you provide to us in your application and during the process will be accessed by our recruitment team. We will not share any of the information you provide during the recruitment process with any third parties without your prior consent. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will retain your personal data only for the duration of the recruitment process and, if you are unsuccessful or choose not to accept an employment offer, for a period of up to 12 months, unless we notify of a

different retention period, so that we can keep you in mind for future roles. At the end of that period, or if you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

13. CORRECTION AND DELETION OF PERSONAL DATA

It is important that the information we have collected about you is accurate and up to date. If you find any errors, we encourage you to contact us so that the information can be corrected. You can also contact us if you want the information to be deleted. Providing there is no legal basis where Onca Technologies is required to keep the data, then it will be deleted upon your request.

We will not store personal data for longer than is necessary to fulfil the purpose of the processing and statutory obligations we have, for example in accordance with accounting law.

14. YOUR PRIVACY RIGHTS

To exercise your data protection rights, you can submit a request via the [Data Protection Query](#) form or by contacting us through our [Contact Form](#).

14.1. You have the right to access information we hold about you

This includes the right to ask us supplementary information about:

- The categories of data we are processing
- The purposes of data processing
- The categories of third parties to whom the data may be disclosed
- How long the data will be stored (or the criteria used to determine that period)
- Your other rights regarding our use of your data

If you would like to submit a Subject Access Request (SAR) to obtain a copy of your personal data, please complete our [Subject Access Request Form](#).

We will respond to verified requests within one month, unless an extension is required due to complexity, in which case we will inform you of the revised timeline.

We will provide you with the personal information requested unless doing so would adversely affect the rights and freedoms of others (e.g. another person's confidentiality or intellectual property rights). We will tell you if we can't meet your request for that reason.

14.2. You have the right to make us correct any inaccurate personal data about you

If you notice that we hold inaccurate or out of date personal information about you, then you have the right to request that this is updated and corrected. You can do so via the [Data Protection Query](#) form or by contacting us through our [Contact Form](#).

14.3. You can object to us using your data for profiling you or making automated decisions about you

Onca Technologies does not use automated decision-making that produces legal or similarly significant effects on individuals. While we use cybersecurity tools to detect potential security threats (such as leaked credentials on the dark web), all alerts, reports, and risk assessments are manually reviewed by our team before being shared with clients. No automated profiling or decision-making processes impact client access to services, contract terms, or other legally significant matters.

14.4. You have the right to port your data to another service

If requested, we will give you a copy of your data in CSV or JSON so that you can provide it to another service. We will endeavour to help you in this process wherever possible. However, we will not do so to the extent that this involves disclosing data about any other individual.

14.5. You have the right to be 'forgotten' by us

You can do this by asking us to erase any personal data we hold about you if it is no longer necessary for us to hold the data for purposes of your use of Onca Technologies. You may request the deletion of data by reaching out to us via our [Contact Form](#).

14.6. You have the right to lodge a complaint regarding our use of your data

Please tell us first, so we have a chance to address your concerns! However, if we fail in this, you can address any complaint to the UK Information Commissioner's Office, either by calling their [helpline](#) or as directed on their website at www.ico.org.uk.

14.7. On the other side of a contract? You have rights too!

If you have signed a contract through Onca Technologies and you wish to exercise your rights, please contact the relevant Onca Technologies user. If you prefer, you can contact us using our [Contact Form](#). We will pass the request on to our user (please provide their name and, if possible, email address). Please include any relevant information about the contract in the contact form so that we can deal with the request appropriately.

15. CHANGES TO THE PRIVACY STATEMENT

The most current version of this Privacy Policy will govern our practices for collecting, processing, and disclosing personal data. We may periodically update this statement for Onca Technologies' operations to reflect any changes to the site. When we update the privacy statement, the new statement will be published on the site 14 days before the changes are implemented.

Please check this Privacy Policy regularly for any changes.

16. CONTACT

If you have any questions about this Privacy Policy or how we process your personal data, please contact us via our [Data Protection Query Form](#) or our [Contact Us](#) page. If you require an alternative method to contact us, please indicate this in your request.

Full name of legal entity: Onca Technologies Limited

For all data protection queries and rights requests, please complete our [Data Protection Query Form](#), and a member of our team will respond as soon as possible. Alternatively, you may contact us in writing at:

Registered Address: Onca Technologies Limited, 6 Laverock Road, Ellon, Aberdeenshire, AB41 6FN, Scotland.

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