

Privacy policy of Self Storage Wem Limited

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Introduction

We respect your privacy and we are committed to protecting your personal data. Any personal data you provide to us and from which you and/or your clients can be identified is stored securely and confidentially and is processed in accordance with applicable legislation.

This privacy policy explains how we collect, process, protect or otherwise handle your personal data and that of your clients when you visit our website or other social media pages, when you contract with us or when you sign up for any brochures or newsletters we may offer from time to time. This privacy policy also tells you about your privacy rights and how the law protects you. Through out our website we may link to other third party websites. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

We are a controller of your personal data.

Please read this privacy policy carefully to obtain a clear understanding of how and why we are collecting and using your personal data.

1. Who we are

When you browse this website or contract with us, we are responsible for holding any personal data provided by you ("Controller") ("we", "us" or "our" in this privacy policy).

We collect, use and are responsible for certain information about you. When we do so we are regulated under the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to any contracts involving the wider operations in the European Economic Area (EEA). We are responsible as 'controller' of that personal information for the purpose of those laws.

We share some of your information with some third parties such as our haulier and logistics partners. Their privacy policies as well as contracts and regulations (as appropriate) set out how they will use this information.

If you have any questions about our use of personal data or this privacy policy, you can reach us using the following details:

- Email address: sales@selfstoragewem.co.uk
- Postal address: Self Storage Wem Limited, C18 Wem Industrial Estate, Wem, SY4 5SD

2. The data we collect about you

Personal data (in some countries referred to as personally identifiable information), means any information about an individual from which that person can be identified, contacted or located. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

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- Identity Data includes first name, last name or similar identifier or title.
- Contact Data includes billing address, email address, telephone numbers and social media accounts.
- Transaction Data includes details about payments to and from you, general reasons for any card payment failures, and other details of subscription services you have purchased from us. Please note that we do not collect Financial Data such as card payment details as such data goes directly to our third party payment solutions providers and is not seen by us. You should separately review the Privacy Policies of our third party payment solutions providers before making payments.
- Technical Data includes internet protocol (IP) address, encrypted (hashed and salted) versions of any login password (but not the actual password), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Information about the services we provide to you.
- Information, emails and records of telephone conversations and other interactions relating to our transactions with you.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

This website is not intended for children and we do not market to or knowingly collect data relating to children under the age of majority according to the jurisdiction and geographical area which applies to you. We do not knowingly collect or use personal information relating to children and any children accessing our site must be supervised by an appropriate adult such as a parent or guardian.

3. How your personal data is collected

We may collect data from and about you by different methods including through:

- Direct interactions. You may give us your Identity, Contact, and Transaction Data by filling in forms and sending them by email or otherwise corresponding with us. This includes personal data you provide when you:
 - contact us for support.
 - request newsletters, brochures or other marketing materials be sent to you or
 - respond to a survey, give us feedback or otherwise contact us.

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- Automated technologies or interactions. As you interact with our website and use various site features, we will automatically collect Technical Data about your equipment, browsing actions and patterns.
- Third parties. We will receive personal data about you from various third parties as set out below:
 - Contact and Transaction Data from providers of payment services .
 - Technical Data from analytics providers.
 - Identity and Contact data.
 - Identity and Contact Data from publicly available sources such as Companies House based inside the UK.

4. How We Use Your Personal Data

General Principles

We will only use your personal data in accordance with the law. Most commonly, we will use your personal data in the following circumstances:

- In order to perform our contractual obligations to you when you have entered into a contract with us.
- Where it is necessary for the legitimate interests of our business to enable us to give you the best product and service and the best and most secure experience and provided that your interests and fundamental rights do not override those interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal obligation to which we are subject.
- Verify your identity.
- Notify you of any changes to our website or to our services which may affect you.
- Improve our services

Generally, we do not rely on consent as a legal basis for processing your personal data although we will give you the right to opt out before sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us. We do not send third party marketing communications to you.

We use your personal information where this is necessary for the performance of any contract we have with you, or because you have asked us to take specific steps before entering into a contract. This includes management of our business and record keeping.

We use your personal information where this is necessary for us to comply with the law (not including our contractual obligations).

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We use your personal information where this is necessary for our legitimate interests or the legitimate interests of a third party (unless there is good reason to protect your personal information which overrides our legitimate interests). This may include sending communications to you which relate to the type of goods or service sold to you and also to better direct marketing relating to other things (subject to you having consented to this) in order to ensure any communications are relevant to you. Where we rely on 'legitimate interests' as the lawful basis to process your personal information, this means that we are permitted to process your personal data if we have good, sensible and practical reasons for processing your personal data which is in our interests. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. You can object to processing that we carry out on the grounds of legitimate interests. See the section headed "Your Legal Rights" to find out how.

Purposes for which we will use your personal data

The table below summarises all the ways we may use your personal, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data relying on more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	a. Identity b. Contact	Performance of a contract with you
To process and activate your order including: a. Manage payments, fees and charges b. Collect and recover money owed to us	a. Identity b. Contact c. Transaction d. Marketing and Communications	a. Performance of a contract with you - to quickly process your transactions b. Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a. Asking you if you wish to renew your subscription or, if not, why you have decided not to renew your subscription b. Notifying you about changes to our terms or privacy policy	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests (to keep our records updated)

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
c. Asking you to leave a review or take a survey		
To send you (either directly or through an email marketing platform) specific materials about our products and services unless you opt out.	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests (to develop and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) b. Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the information we serve to you	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, our related services, marketing, customer relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about add-on services that may be of interest to you	a. Identity b. Contact	Necessary for our legitimate interests (to develop our products and services and grow our business)

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	c. Technical	
	d. Usage	
	e. Profile	
	f. Marketing and Communications	

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. We do this to personalize your experience and allow us to deliver the type of content and product offerings in which you are most interested. This is part of our marketing.

You may receive marketing communications from us if you have requested information from us and you have not opted out of receiving such marketing.

Opting out

If we provide marketing messages, you will be able to ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you OR by contacting us at any time. It may take up to 7 days for this to take place.

Do Not Track Signals

We honour Do Not Track signals. We do not track, plant cookies or use advertising when a Do Not Track (DNT) browser mechanism is in place. We do not allow third-party behavioural tracking.

Restrictions on marketing emails

In addition to the above, we agree to the following in relation to commercial emails: (i) not to use false or misleading subjects or email addresses, (ii) to identify the message as an advertisement in some reasonable way, (iii) to include the physical address of our business, (iv) to monitor third-party email marketing services for compliance, if one is used, (v) to honour opt-out/unsubscribe requests quickly, and (vi) to allow users to unsubscribe by using the link at the bottom of each email.

Third-party marketing

We will not share your personal data with any third party for marketing purposes.

Cookies

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We may collect information using cookies or similar technologies. Cookies are small files of data that are downloaded to your computer or mobile device when you visit a website. Your browser sends these cookies back to the website every time you visit the website again, so it can recognise you. This allows websites to tailor what you see on the screen.

We do not use cookies for tracking purposes or to store visitor preferences. We only use cookies to make our websites operational. We may also choose to use analytics cookies for internal research on how we can improve the service we provide for all our users. Such cookies would simply assess how you interact with our website.

We will not collect any personal information in our cookies or share them with third parties.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since each browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We do not sell, trade or otherwise transfer to outside parties your personal data. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, serving our users or providing a cloud storage platform, so long as those parties agree to keep this information confidential. More specifically, we may share your personal data with the parties set out below for the purposes set out in the above table:

- Software development and maintenance service providers, acting as processors, and based in the United Kingdom, who provide IT and system administration services.
- Service Providers who provide haulage or transportation service. Also in relation to any payment service provider. The service provider is the processor of the personal information that is provided to the service provider via the payment link as well as the personal information that you provide directly to the service provider. You should read the payment service provider's privacy policy before providing such data.
- Professional advisers including business or financial advisers and auditors based in the United Kingdom who provide accounting and auditing services.

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- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who may require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions and the terms of our agreements with them. Our agreements with them may take the form of individually negotiated agreements or signing up to their standard terms and conditions provided that such standard terms and conditions comply with the above...

We may also release information when its release is appropriate to comply with the law.

6. International transfers

Our operations are supported by a network of computers, cloud-based servers and other infrastructure and information technology including, but not limited to, third party service providers.

Unless otherwise notified in an amendment to this privacy policy, the external third party service provider who provides payment platform services, shall be based either inside or outside the UK but within the European Economic Area..

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data or to countries where a specific exception applies under data protection law.
- Where we use certain service providers based outside the UK, we may rely on contractual protections to ensure that your personal data has the same protection it has in the UK. We only transfer your data outside the UK to the extent necessary in order to provide the requested service or goods to you.

7. Data security

Security Measures

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These security measures are implemented when you place an order or enter, submit or access your information. Our security measures include an intrusion detector system. We also use regular malware scanning.

In addition, your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems on a need to know basis. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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All transactions are processed through a payment gateway provider. Accordingly, all sensitive credit information you supply is handled by the third party payment service provider. We do not store or process this information. If a problem occurs in relation to a payment transaction, we are notified of the nature of the problem but receive no further details.

Suspected Data Breaches

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a detected breach where we are legally required to do so and in a timely manner.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, and Transaction Data) for seven years after they cease being customers for tax and accounting purposes. Thereafter we will securely delete the personal data.

We will retain the personal data you provided on registering an account with us so long as that account remains in existence. If we are legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may also retain some of your personal information for a limited period of time, even after you have closed your account.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the following rights:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

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- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where (i) there is no good reason for us continuing to process it, (ii) you have successfully exercised your right to object to processing (see below), (iii) we may have processed your information unlawfully or (iv) we are required to erase your personal data to comply with local law. If we are unable to comply with your request of erasure for specific legal reasons we will notify you at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- You are entitled to fair processing of information and transparency over how we use your personal information.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individual's rights under the UK GDPR](#).

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

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You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk) or to the equivalent body in the country in which you reside and from which you have accessed our website or social media pages. As well as having enforceable rights against data users, you also have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or other data protection regulatory body so please contact us in the first instance.

11. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. If you open an account with us, please keep us informed if your personal data changes during your relationship with us by emailing us.