Wx Labs Ltd – Privacy Policy

Version 1.1 – Last updated: 14 September 2025

1. Who we are

Data controller:
Wx Labs Ltd
Nexus, University of Leeds
Discovery Way
Leeds
LS2 3AA
United Kingdom

Company number: 16487310 (registered in England & Wales).
ICO registration number: ZB954744.
Privacy contact email: privacy@wxlabs.co.uk.

Wx Labs Ltd is responsible for deciding how and why your personal data is used when you interact with us or our products.

2. What this policy covers

This policy applies to our websites on the wxlabs.co.uk domain and subdomains (for example, the marketing site and documentation), our online store operated via Shopify for the WxStation Personal product and any related accessories, the WxStation Personal and WxStation Industrial devices and associated cloud services (such as companion dashboards and APIs), and our mailing lists, events, support channels and recruitment processes.

It does not apply to third-party platforms that you control yourself (for example, your own cloud storage destination that you configure your device to send data to). Those providers act as independent controllers for their part of the processing.

3. The data we collect

3.1. When you visit our website

We may collect basic technical data such as your IP address, browser type, operating system, pages viewed and timestamps, together with error and security logs and your cookie preferences. When we enable Google Analytics in future, we will ask for your consent for analytics cookies before using them.

3.2. When you use our online store (Shopify)

When you place an order or create a store account, we process identification and contact details (name, email address, billing and delivery address, phone number if provided), order details (products purchased, order dates, prices, currency), payment information (payment method, partial card details and transaction identifiers – we do not store your full card number; this is handled by Shopify and its payment providers), and shipping information such as courier details, tracking numbers and customs information where required.

3.3. When you create a Wx Labs account / register a device

To operate WxStation devices, we may collect account information (name, email address, account ID), device registration information (device identifiers, model, firmware version, approximate installation location such as GPS coordinates, site name or description), and configuration data such as device settings and alert preferences. Accounts are currently handled using Google / Firebase Authentication.

3.4. WxStation Personal – crowdsourced network

WxStation Personal is designed as a crowdsourced weather and sky-observation device. Contributing data to the shared Wx Labs dataset is a core part of the product.

From WxStation Personal devices we may process sky imagery and timelapses captured by the device (including raw images and sequences, and derived images such as contrast-enhanced, HDR, cropped or processed versions), audio recordings from on-device microphones (short segments or continuous recordings used internally to detect events such as rain, hail, thunder, wind turbulence, wildlife or anthropogenic noise – we do not use audio for speech transcription), and associated metadata such as timestamps, device identifiers, approximate location for meteorological use, and basic camera and exposure parameters.

We deliberately design the device to look primarily at the sky (for example, via mounting height and field of view). However, nearby buildings, gardens, vehicles or people may be incidentally captured in some frames.

We use automated techniques to crop, mask or blur non-sky areas (for example, parts of the frame below the horizon and any obvious faces or number plates) before onward use, wherever feasible. Over time, our goal is that long-term archives consist primarily of sky-only images that no longer relate to identifiable individuals or private spaces.

Under our product terms, you keep your rights in the images generated by your own WxStation Personal, but by using the product you grant Wx Labs a broad licence to use, modify, analyse and commercially exploit your device's data (images, audio and derived data), including selling or licensing anonymised datasets and trained models. This policy explains the privacy aspects of that processing.

3.5. WxStation Industrial

WxStation Industrial is aimed at professional and organisational users. By default, we process only what is needed to provide the agreed services: sky images and metadata, optional audio data, and device configuration and status. We may offer opt-in participation in the wider Wx Labs dataset for AI training and crowdsourced analyses.

Industrial customers can choose not to contribute to the global dataset at all, or to opt in (for some or all devices) and allow their data to be used in the same way as WxStation Personal devices. If an industrial customer later withdraws consent or opts out, we will stop using future data from that point onwards for the crowdsourced dataset and training. We may continue to use models and derived datasets that were already trained or generated, as they cannot be "un-trained" in a practical sense.

3.6. Support, communications and CRM

When you contact us or we interact as part of a project, we may process your contact details (name, email, organisation, role, phone if provided), the content of emails and support messages, troubleshooting information such as device logs or screenshots you send us, and notes of interactions kept in our internal CRM (currently Notion) for business relationship management.

3.7. Mailing lists, events and marketing

If you sign up for updates or attend events we organise, we may process your contact details and preferences (name, email, organisation, topics of interest), subscription status and which emails you open or click, and event registration information such as event name, attendance, and any dietary or access needs you provide. Mailing lists may be operated using providers such as Brevo. All marketing email is opt-in with double opt-in where supported, and you can unsubscribe at any time.

3.8. Recruitment

When you apply for a role, we may process CVs, covering letters and application form details, the application source (for example LinkedIn, Indeed or a university careers service), interview notes and evaluation outcomes, and references where you have authorised us to collect them. We do not ask for unnecessary sensitive information and we only process what is needed for recruitment.

4. How and why we use personal data (lawful bases)

Under UK GDPR we must have a lawful basis for each use of your personal data. We mainly rely on contract, legitimate interests and consent.

4.1. Contract

We use data where necessary to perform a contract with you or to take steps at your request before entering into one. This includes processing and delivering your orders via Shopify and our chosen couriers, creating and managing your Wx Labs account, registering and operating your WxStation device and associated dashboards, providing support and handling warranty, returns or repairs, and communicating with you about your orders, service changes and safety notices. Our legal basis in these cases is performance of a contract (UK GDPR Art. 6(1)(b)).

4.2. Legitimate interests

We use data where necessary for our legitimate interests, balanced against your rights and reasonable expectations. These interests include operating the Wx Labs crowdsourced network (using imagery, audio features and metadata from WxStation Personal and, where opted in, from WxStation Industrial to improve models and services, generate new meteorological insights and datasets, and support research collaborations and future services); AI training and model improvement (to detect clouds, precipitation, lightning and other phenomena, estimate cloud fraction, motion and solar irradiance, and detect audio events such as rain, hail, thunder or wildlife); resale or licensing of anonymised datasets created from WxStation data (for example anonymised time series, sky-only images or gridded statistics) to third parties in energy, aviation, research or other sectors; analytics, product development and safety (including improving reliability, understanding usage patterns, and protecting our services against abuse and attacks); and B2B relationship management (keeping basic CRM records about customers, suppliers, partners and prospects in Notion or similar tools). Our legal basis here is legitimate interests (UK GDPR Art. 6(1)(f)).

We carry out balancing tests to ensure these interests do not override your fundamental rights and freedoms. For WxStation Personal, the crowdsourcing element is a core part of the product and is clearly communicated up front. For WxStation Industrial, participation in the global dataset is optional and can be withdrawn for future data.

4.3. Consent

We rely on consent for marketing emails and newsletters (for example via Brevo or a similar service), non-essential cookies and similar technologies for analytics (such as Google Analytics), which are only used if you accept them via our cookie banner, and any situations where we ask for clear, specific permission for a particular optional use of data. You can withdraw your consent at any time, for example by using the "unsubscribe" link in emails or adjusting cookie settings. Our legal basis in these cases is consent (UK GDPR Art. 6(1)(a)).

4.4. Legal obligations

We may process data where necessary to comply with our legal obligations, for example keeping accounting records for HMRC, responding to lawful requests from public authorities, and handling complaints, disputes or regulatory investigations. Our legal basis here is legal obligation (UK GDPR Art. 6(1)(c)).

5. Audio and voices

WxStation devices may use microphones for meteorological and environmental purposes only. We use raw audio internally to research and develop features, for example detecting rain intensity, hail, thunder, fan behaviour, wildlife or noise pollution. We do not use audio to transcribe or analyse speech content and we do not share raw audio with third parties. We may share derived, anonymised parameters with third parties, such as rain intensity at a particular time, sound pressure levels or a bird presence index. We recognise that voices may be incidentally recorded. Such recordings are treated as sensitive and are subject to stricter access and retention controls.

6. How long we keep data (retention)

We keep personal data only for as long as reasonably necessary for the purposes described above, including to satisfy legal, accounting or reporting requirements. We also strive to minimise personal data in long-term archives.

6.1. Website and store

Web server logs are typically kept for up to 12 months. Shopify order and invoice data is generally retained for 7 years to meet UK tax and accounting requirements. Analytics data (for example from Google Analytics, once enabled) is retained according to your cookie preferences and the provider's standard options, typically up to 14 months.

6.2. Accounts, communications and CRM

Wx Labs account details and device registration information are kept while your account is active; where you close your account, we may retain minimal records for up to 2 years for security and record-keeping. CRM notes and project correspondence are kept while the relationship is active, then typically up to 5 years after the last meaningful interaction. Mailing list data is kept until you unsubscribe; we may retain a minimal suppression record for up to 2 years to ensure we do not email you again by mistake. Support communications are typically kept for up to 5 years after resolution to help with ongoing support and disputes.

6.3. Sky imagery and derived data

Because WxStation imagery is intrinsically valuable for meteorology and climatology, we differentiate between identifiable and anonymised forms. Identifiable images and timelapses, where individuals, private property or sensitive features may be visible, are generally kept for up to 5 years from capture, unless a longer period is needed for a specific project or dispute. We may apply automated cropping, masking and blurring techniques during this period. We aim to generate anonymised "sky-only" images and derived datasets, where only the sky is visible or data has been aggregated to the point it no longer relates to an identifiable person or household. Once images are effectively

anonymised (for example by removing ground features and identifiable details), they are treated as non-personal data and may be kept indefinitely for meteorological and research purposes. Models trained on device data cannot practically be un-trained; we may keep trained models and associated performance metrics indefinitely, provided they no longer permit any reasonable re-identification of individuals.

6.4. Audio

Raw audio recordings used internally for feature development and training are kept for a maximum of 2 years from capture and then deleted or irreversibly anonymised. Derived audio features, such as rain intensity, sound levels or event flags, are treated similarly to other derived datasets and may be kept indefinitely once they no longer relate to an identifiable individual.

6.5. Recruitment

For unsuccessful job applicants we retain applications and related data for up to 2 years after the end of the recruitment process, unless local law requires a different period or you ask us to keep your details for longer. For successful applicants, information becomes part of the personnel file and is retained according to employment law and internal HR policies.

We review retention periods periodically and may adjust them as our services evolve. Where we do, we will update this policy.

7. Data sharing and service providers

We do not sell your personal data in the sense of selling lists of identifiable customers. We do, however, license and sell anonymised datasets and analytics derived from WxStation data, especially for WxStation Personal and any opt-in Industrial data.

We share personal data with trusted third-party service providers acting as processors on our behalf, including hosting and infrastructure providers such as Hostinger (website hosting), GoDaddy (DNS and certificates) and Google Cloud / Firebase (authentication, databases, storage); e-commerce and payment providers such as Shopify and its payment processors, and our business bank (currently Monzo Bank) for bank transfers; email, productivity and collaboration tools such as Google Workspace and mailing list providers like Brevo; business operations tools such as Xero for accounting, professional advisers such as accountants where needed, and Notion for CRM and notes; logistics and shipping partners such as DHL, DPD and FedEx; and recruitment and events platforms such as LinkedIn, Indeed, university careers platforms or mailing lists, and tools like Google Forms/Sheets or Eventbrite.

All processors are required to handle personal data in line with this policy, applicable law and our written instructions, and to implement appropriate technical and organisational security measures. We may also disclose data where required by law, court order or a regulator, or in connection with a business transaction such as a merger or acquisition, in which case we will take appropriate steps to protect your privacy.

8. International transfers

Many of our providers, for example Google, Shopify and Notion, operate globally. This means your data may be processed in countries outside the UK or European Economic Area (EEA), including countries that may have different data protection laws. Where data is transferred outside the UK or EEA, we rely on adequacy regulations (where the UK government or European Commission has recognised a country as providing an adequate level of protection), or on standard contractual clauses and equivalent safeguards approved under UK and EU data protection law. You can contact us at privacy@wxlabs.co.uk for more information about the safeguards used for a particular service.

9. Your rights

Under UK and EU data protection law, you have certain rights in relation to your personal data, subject to some conditions and exceptions. These include the right of access to obtain a copy of your personal data and information about how it is used; the right to rectification to correct inaccurate or incomplete data; the right to erasure to ask us to delete your personal data in certain circumstances; the right to restriction to ask us to limit the processing of your data in certain cases; the right to data portability to receive personal data you provided to us in a structured, commonly used format and to ask us to transfer it to another controller where technically feasible; the right to object to processing based on legitimate interests, including profiling, and to direct marketing; and rights in relation to consent, allowing you to withdraw your consent at any time where we rely on it (for example, for marketing emails or analytics cookies).

For WxStation Personal and Industrial data, your ability to object or request deletion may be constrained where data has already been irreversibly anonymised or incorporated into trained models, but we will always consider your request and explain what we can and cannot do.

To exercise any of these rights, please email us at privacy@wxlabs.co.uk.

You also have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office (ICO). More information is available at ico.org.uk. Our ICO registration reference is ZB954744. We would, however, appreciate the chance to address your concerns first.

10. Age limits and child privacy

Our products and services are not intended for children under 16, and we do not knowingly collect personal data directly from children for account or purchasing purposes. Accounts and purchases should be made by an adult, even if younger people assist with device installation or use. If you believe a child has provided personal data to us without appropriate consent, please contact us and we will take steps to delete it where appropriate.

11. Information security and incident response

We take security seriously and use a combination of technical and organisational measures to protect personal data. These include encrypted connections (HTTPS) for our websites and APIs, access controls and authentication including multi-factor authentication on key systems, regular software updates and security patching on critical infrastructure, encryption of storage where appropriate (for example for end-user devices and staff laptops), and restricting access to personal data to staff and contractors on a need-to-know basis. No system can be 100% secure, but we endeavour to protect your data and respond promptly to any incidents. If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify you and, where required, the relevant supervisory authority.

12. Changes to this policy

We may update this Privacy Policy from time to time, for example if our services or legal requirements change. When we make material changes, we will take appropriate steps to bring them to your attention, for example by placing a notice on our website or within device dashboards. The "Last updated" date at the top of the policy shows when it was most recently revised.