CUSTOMER PRIVACY NOTICE
JOULE IRELAND

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1. Who we are

Joule is a manufacturer and distributor of Heating, Ventilation, Hot Water and Renewable Energy Solutions. We manufacture a wide range of products using innovative designs and utilizing the most up-to-date production methods.
Joule offers heating & plumbing design services through our dedicated in-house design team. Providing design packages to the new-build domestic market and all types of properties; from the self-build up to large sites for the major house builders throughout Ireland, involving all types of heating systems including solar and heat pumps.

Personal data collection, processing and use are conducted solely for the purpose of carrying out our services to you.

Joule's Privacy Notice refers (together with our Cookies Policy) to our commitment to our compliance with data protection legislation including the Irish Data Protection Acts, Data Protection Act 1988-2018, and the EU General Data Protection Regulation.

Throughout this document "we", "us", "our", and "ours" refers to Joule Ireland's Privacy Notice.

It is your responsibility to read any Terms and Conditions and this Privacy Notice before entering into a contract with Joule Ireland.

2. How to contact us

There are many ways you can contact us, including by phone, email, and post. More details can be seen here *https://joule.ie/customer-support/*

Post:
Data Protection Lead
Unit 407 Northwest Business Park
Ballycoolin
Dublin 11
D11HD36

Email:
jiedataprotection@joule.ie

Phone:
(01)6237080

3. What happens if we make changes to this notice?

Where changes to this Privacy notice occur, the updated version will be published on our website and where appropriate/possible communicated directly to individuals via email or social media.

Current version is Reference *JIE/PN/CUST-V1.1 NOV 2025*.

4. Who do we collect data about?

We collect and process your personal data only when such data is necessary in the course of providing our services to you. This personal data includes any offline or online data that makes a person identifiable.

We process data for the following groups of individuals where it is necessary:

- Clients (and their employees)
- Customers (end users of the products)

We are the controller for the personal information we process, unless otherwise stated.

5. When do we collect your data from you?

You directly provide us with most of the personal data we collect. Depending on the service, we **may** collect personal data and process data for:

- Submission of a tender
- Submission of a request for tender
- Onboarding on site
- New client account forms
- New contract account forms
- Site entry and attendance is recorded on our access control systems.
- When a customer has an issue with a product
- When there is a warranty issue/recall of a product
- When a site is handed over to the residents and the management company provide the details to us
- In the event of an accident or incident
- Use of our systems or website via browser cookies

6. What types of your data do we collect?

As part of the provision of our services, we **may** need to obtain and process personal data as required. If requested, a member of our staff will explain the purpose for which any information is required prior to obtaining the data.

- **Clients (and their employees)**
  - Name and contact details (Work: address, relevant phone numbers, email address)
  - Signatures
  - Director's due diligences per contracts
    - Trade name, legal name, registered address, business address, trade references
    - Directors published information from Company's Registered Office
    - Credit checks
  - Names and work contact details of all your employees and contractor who will engage with our team
  - Sign in for visitors
  - Photos and videos
  - Image captured via CCTV

- **Customers (end users of our products)**
  - Name and contact details (address, relevant phone numbers, email address)
  - Signatures
  - Personal information you provide us during any communication with our employees
  - Image captured via CCTV

7. When do we collect sensitive personal data?

Sensitive data (special categories of data under GDPR) includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We may collect the following special categories of data where necessary:

- In the event of an incident or accident
- Biometrics for site entry
- Medical information to assist vulnerable individuals

We will process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.

2. Where we need to carry out our legal obligations including but not limited to Health and Safety and in line with our data protection policy.
3. Where it is needed in the public interest (e.g. pandemic and required by law) and in line with our data protection policy.
4. We may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

8. When do we receive your data from a third party?

Where necessary for the service provided, we may receive your data indirectly from:

- The lead individual from the client or contractor
- Management companies during handover of a site to residents
- Clients who sold our products to you as the customer end user

9. What are the legal bases upon which we process your data?

We collect your data based on the following legal bases:

Consent:
Where you have explicitly agreed to us processing your information for a specific reason (e.g. event photography, cookies).
Where consent is relied upon as a basis for processing of any personal data, you will be presented with an option to agree or disagree with the collection, use or disclosure of personal data. Once consent is obtained, it can be withdrawn at any time.

Contract:
When processing is necessary for the performance of a contract with you or to take steps at your request prior to entering a contract.
Where you entered a contract with us and it is necessary to process your personal data for the administration of the services you provide us with as a contractor, or where we provide you with services as a client.

Compliance:
We must meet our duties to the Health & Safety Regulator and comply with our legal obligations. We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Health and Safety Authority and the appropriate Supervisory Authority if required by law such as:

- keeping records for revenue or tax purposes.

- providing information to a public body or law enforcement agency.
- we may be required to process certain data to carry out our obligations under health, safety legislation.
- we may also disclose your information if required to do so by law or another binding request.
- we are required by law to process that data to ensure we meet our 'anti-money laundering' obligations.

Where it is necessary and proportionate, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes.

Public interest:
If required to do so, we may need to capture your data as required by government or law (e.g. pandemic response).

Legitimate interest:
To conduct and manage our business, provide the best service and ensure security.

When we process your personal data based on our legitimate interest, we carefully consider the impact on you and uphold your rights under data protection laws to object where applicable.

Our legitimate business interests do not automatically take precedence over yours.

We refrain from using your personal data for activities that would negatively impact you unless we have your consent, or we are legally required or permitted to do so.

Outlined below are the ways we process your data for our legitimate interests. If you have any concerns about this processing, you have the right to object. For more information on your rights, please refer to the "Your Rights" section below.

Processing of your personal data may be necessary for the purposes of a legitimate interest pursued by us for any of the following:

- Use of CCTV on our sites to safeguard the health, safety, and security of all resources.
- To manage the tender process for potential clients.
- Conduct surveys to provide information on the quality of our product or service.
- Use of your personal data to operate our business on a day-to-day basis.
- Enhance the training of our workforce.
- To establish, exercise and safeguard our rights, (including where necessary to take enforcement action) and to respond to claims made against us.
- To safeguard the safety and security of:
    - all individuals on site under our responsibility,

- IT systems and devices,
- Property/ buildings,
- information located or stored on the premises,
- our assets, and those of service providers, consultants, and advisors that assist us in carrying out their functions.

- In the prevention and detection of fraud.
- Photos and videos where required for audits and progress reporting on jobs.

10. What happens if you do not provide us with the data if legal basis is consent or contract?

Where lawful basis is a statutory or contractual requirement, if you are obliged to provide the personal data, failure to provide this information may result in us being unable to provide our services or accepting your services.

11. What is the purpose(s) for processing your data?

We process your data, when necessary, to provide our services. We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another purpose and that purpose is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the basis which allows us to do so.

You agree that any data you provide to us will be true, complete, and accurate in all respects and you agree to notify us immediately of any changes to it. We will only collect personal information from or about you which is necessary for the following purposes:

Clients (and their employees):

- Provide and administer our agreed services per the terms of service under contract
- Meet our legal and compliance obligations
- Maintain our relationship with you whilst you are our client throughout the project and investigate any complaints or disputes or accidents
- Manage the delivery of services to employees
- Contact you for direct marketing purposes, subject to restrictions under the relevant laws, including the right to opt out of such marketing
- Provide you with progress information relating to the project on a regular basis
- Respond to information requests
- Obtain your feedback on our services
- Notify you about changes to contracted services relevant to you
- Obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management

Customer (end user of our products):

- Set up and administer your account as a customer with us
- Provide quality products and after sales services and parts to you
- Maintain our relationship with you whilst you are a customer and investigate any complaints or disputes or accidents
- Provide essential communication, including to respond to information requests
- Communicate any product recalls, or warranty notifications
- Obtain your feedback on our products and services
- Contact you for direct marketing purposes, subject to restrictions under the relevant laws, including the right to opt out of such marketing
- Notify you about changes to contracted services relevant to you

General:

- Provide our website and respond to queries
- Comply with all relevant laws
- Manage your safety and security while on our premises
- Safeguard the IT Network
- Facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders
- Investigate, exercise or defend legal claims or other claims of a similar nature
- Obtain consent for publishing photos/videos for marketing purposes

12. What you need to do when you provide us with other individuals information data

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this Privacy Notice before their personal information is shared with us (e.g., employees of clients). You must have their agreement to disclose general information to us.

You do not need to provide this Privacy Notice if:

- The individual already has the information
- Disclosure is expressly laid down in law with appropriate measures to protect the individual's legitimate interests
- The data must remain confidential due to an obligation of professional secrecy regulated by law

13. How we protect your data

We collect this data in a transparent way and only with the full knowledge of interested parties. Once this information is available to us, the following rules apply:

Our data will be:

- Accurate and kept up to date
- Collected fairly and for lawful purposes only
- Processed by us based on either a valid contract, consent, legal compliance or legitimate interest
- Protected against any unauthorised access or illegal processing by internal or external parties

Our data will not be:

- Communicated to any unauthorised parties
- Stored longer than required for the purpose obtained
- Transferred to organisations, states, or countries outside the European Economic Area without adequate safeguards being put in place as required under Data Protection Law

Our commitment to protect your data:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in data protection and security
- Build secure networks to protect online data
- Establish clear procedures for reporting privacy breaches or data misuse
- Implement data protection practices (e.g., document shredding, secure locks, data encryption, frequent backups (either on premises or the cloud), access authorisation etc.)

14. How our third-party providers protect your data.

We only engage with third-party service providers who provide sufficient guarantees to protect your data, following our instructions, and are bound by a data processing agreement.

15. How we use your information for Marketing

As part of improving our service to you, from time to time, we may inform you of goods, services, competitions, and/or promotional offers available from us.

We may use your personal information to make you aware of products and services which may be of interest to you. We can do this by using some of the personal information we hold about you to better understand your needs. It includes information you tell us and information we collect when you use our products or services. This information helps us to understand which products, services and offers may be relevant for you based on your profile.

It is in our and your interests to use personal information this way to better understand our customers' needs and preferences so that we can create more tailored and suitable marketing messages.

We may use information such as:

- Types of products purchased
- Services used
- Range of products purchased
- Previous interactions with marketing communications e.g. opens, reads, clicks

We may contact you via:

- Mobile App, E-mail, SMS, Post, Telephone

We may share your data with third parties' software and marketing providers to send messages on our behalf.

Opt-in:
Where you have consented to marketing by opting in, we will send you marketing communications.

You may opt out at any time by emailing us at jiedataprotection@joule.ie or writing to us at our address at the top of this document or by using the "opt-out" options in any marketing message we send you.

16. How we use your information for surveys

We would like the opportunity to understand your experiences with us and to monitor the performance and effectiveness of our delivery of our services to you. We would like to assess the quality of our services. We promise to listen to you and to adapt to the recommendations provided to ensure you are receiving the best quality service from us.

From time to time, we may conduct satisfaction surveys. Where we do so, we rely on the lawful processing of legitimate interest to enhance our service delivery. A withdrawal option will be provided in all survey communications.

17. How we use Automated Processing or "Analytics"

We do not conduct any automated processing which has legal consequences.

18. Who we share your information with

Your personal information may be processed by third parties acting on our behalf for the purposes outlined above. Where necessary, we may disclose your information to:

- **Auditors:** To comply with legislative and regulatory requirements for maintaining audited financial accounts, we may provide access to our records (which may include your information) to appointed internal and external auditors.
- **Regulatory and statutory bodies:** Revenue, Department of Social Protection, Data Protection Commission.
- **Professional and business service providers:** Legal advisors, business consultants, financial institutions, leasing companies, insurers, recruitment agencies, marketing consultants, subcontractors.
- **Operational service providers:** IT support providers, couriers, shredding companies, security firms, printing companies, CCTV operators, administration services.
- **Law enforcement and debt recovery agencies:** An Garda Síochána, debt collection agencies.
- **Other parties:** Clients, contractors, customers, potential successors to our business.

19. How long will we hold your information?

We retain personal data only as long as necessary for the purposes for which it was collected, as required by law or regulatory guidance or to defend any legal actions. Where possible, we record retention periods; otherwise, we explain the criteria for retention.

20. Processing your information outside the EEA

Some third parties we share your data with may reside outside the European Economic Area (which currently comprises the Member states of the European Union plus Norway, Iceland and Liechtenstein). If so, your information will be treated to the same standards adopted in Ireland and include the following data protection transfer mechanisms:

- Model Clauses (also known as Standard Contractual Clauses) are standard clauses in our contracts with our service providers to ensure that any personal data leaving the EEA will be transferred in compliance with EU data-protection law. Copies of our current Model Clauses are available on request.

- Transfers to countries outside the EEA which have an adequate level of protection as approved by the European Commission such as the United Kingdom, https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en. The adequacy decision on the EU-U.S. Data Privacy Framework covers data transfers from any public or private entity in the EEA to US companies participating in the EU-U.S. Data Privacy Framework https://ec.europa.eu/commission/presscorner/detail/en/qanda_23_3752.
- Transfers permitted in specific situations where a derogation applies as set out in Article 49 of the GDPR. For example, where it is necessary to transfer information to a non-EEA country to perform our contract with you.

21. How to exercise your information rights

You have the right to:

- Access your personal data
- Rectification of any errors in your personal data
- Erasure of your personal data
- Restriction of processing
- Data portability
- Know if any automated decisions are made about you
- Object to processing
- Complain to the Data Protection Commission