

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 to 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 you may agree to as part of the service and 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:

jjedataprotection@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 through a communication channel such as email and/or our social media.

Current version is Reference *JIE/PN/CUST-V1.00 MARCH 2025*, as part of our continual improvements, we have provided a new format and a new updated version of previous content.

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 physical data or online data that makes a person identifiable.

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

- A. Clients (and their employees)
- B. Customer-End user 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 on behalf of you and your employees which is required for the services provided. 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
- Enter a site (Client, Regulator and audit or Visitor) and attendance is recorded on our access controls 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 or view our systems or website via your browser's cookies

6. What types of your data do we collect?

As part of our services to you, we **may** need to obtain and process personal data as required **where necessary** to provide our services such as *(if requested, a member of our staff will explain the purpose why any information is required prior to obtaining the data.)*:

A. Clients (and their employees)

We **may** need to obtain and process the following personal data as required **where necessary** to provide our services to you:

- Your 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 your contractor who will engage with our team
- Sign in for visitors
- Photos and videos
- Image captured via CCTV

B. Customer-End user of the products

We **may** need to obtain and process the following personal data as required **where necessary** to provide our services to you:

- Your 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 is known as special categories of data in Data Protection law. Special categories of data are defined by GDPR as processing of personal data 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:

- Onboarding in the medical declaration completing by you, where you have stated any medical condition that you may have which we should know for Health and Safety purposes
- In the event of an incident or accident

- Biometrics for enter to sites
- Medical information to assist vulnerable individuals with special needs.

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.

Less commonly, 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 it is necessary for the service provided, we may receive your data indirectly from the following sources:

- The lead individual from the client (your employers)
- The lead individual from the contractor (your employers)
- From the management company during handover of the site to the residents
- Client 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 basis:

Consent

Where you have explicitly agreed to us processing your information for a specific reason such as:

- Photograph and or video for publication at events,
- Cookie (see cookie policy)

Where the legal basis of consent is relied upon for processing of any personal data, you will be presented with an option to agree or disagree with the collection and the use or disclosure of the personal data.

Right to withdraw consent at any time

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 stage.

Contract

When processing is necessary for the performance of a contract with you (or by you) or to take steps at your request prior to entering a contract.

We will collect your personal data to consider your tender for services requested by or for us.

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 to 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 (for example a pandemic and required by law).

Legitimate interest

Legitimate Interests means the interests of the Joule Ireland in conducting and managing our business to enable us to give you the best service and the best and most secure experience.

When we process your personal data based on our legitimate interests, we carefully consider the impact on you and uphold your rights under data protection laws to objective 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 contractor applicants and communication each stage of the process with the applicant.
- 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 use.
- 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, and assets, and those of service providers, consultants, and advisors that assist use in carrying out its 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?

Joule is a manufacturer and distributor of Heating, Ventilation, Hot Water and Renewable Energy Solutions. 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. We process your data, when necessary, to provide this service.

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:

A. Clients (and their employees)

- To provide and administer our agreed services per the terms of service under contract
- To meet our legal and compliance obligations
- To maintain our relationship with you whilst you are our client throughout the project and investigate any complaints or disputes or accidents
- To manage the delivery of services to each employee on behalf of the client throughout their tenure of the contract
- 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
- To provide essential communication with you, including to respond to information requests submitted
- To obtain your feedback on our services
- To notify you about changes to contracted services relevant to you
- To obtain credit references, credit checks and for debt collection, fraud detection and prevention and risk management purposes.

B. Customer-End user of the products

- Set up and administer your account as a customer with us
- Provide quality products and after sales services and parts to you
- To maintain our relationship with you whilst you are a customer and investigate any complaints or disputes or accidents
- To provide essential communications to you, including to respond to information requests submitted
- To communicate any product recalls, or warranty notifications
- To obtain your feedback on our products and services
- To notify you about changes to contracted services relevant to you

C. General

- To provide this website to you and respond to your queries
- To comply with all relevant laws
- To manage your safety and security while you are on our premises
- To safeguard the IT Network
- To facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders
- To investigate, exercise or defend legal claims or other claims of a similar nature
- To obtain consent from any individual for the purposes of publishing photos/video of such person 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., referees as nominated by candidates, employees of clients, employees and sub-contractors of contractors). Before you disclose general information to us about another person, you should be sure that you have their agreement to do so.

You cannot provide health declarations on behalf of your employees; each employee must provide their consent for this information.

You do not need to provide this Privacy Notice in the following situations

- the individual already has the information
- obtaining or disclosure such information is expressly laid down in the law to which we must comply, and which provides appropriate measures to protect the individual's legitimate interests
- where the personal data must remain confidential subject 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 internal or external parties
- Stored for 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 measures
- Build secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Establish data protection practices (e.g., document shredding, secure locks, data encryption, frequent backups (either on premise 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 would like to inform you of goods, services, competitions, and/or promotional offers available from us. We may wish to use different means when sending such marketing communications.

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 will use the following information about you to enable us to plan our marketing campaigns for examples:

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

We can reach out to you with this information in all sorts of ways:

- through Mobile App
- by e-mail
- SMS
- post
- telephone

We may share your data with third parties' software and marketing providers so that they may send you messaging on our behalf.

Opt in

Where you have consented to marketing by opting in to marketing, we will send you marketing.

You have a right to notify us free of charge at any time that you wish to refuse such marketing by emailing us at jiadataprotection@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 communication thereafter.

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 also be processed by other organisations on our behalf for the purposes outlined above. We **may** disclose your information where necessary to the following

- To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.
- Revenue, Social Welfare. Data Protection Commission, legal advisors, business advisors, financial and leasing institutions, law enforcement, Garda, debt collectors, IT providers, couriers, shredding company, security company, printing company, CCTV company, administration services, insurers, recruitment agents, marketing consultants or subcontractors and to possible successors to our business, others
- Client
- Contractor
- Customer

19. How long will we hold your information?

We will only retain personal data for as long as necessary for the purposes for which it was collected as required by law or regulatory guidance to which we are subject or to defend any legal actions. Where possible we record how long we will keep your data. Where that is not possible, we will explain the criteria for the retention period.

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 we do this, 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 of access to your personal data
- You have the right to rectification to any errors of your personal data
- You have the right to erasure of your personal data
- You have the right to restriction of processing
- You have the right to data portability
- You have the right to know if any automated decisions are made about you
- You have the right to object
- You have the right to compliant to the Data Protection Commission