# P.I. Pneumatics Limited – Privacy Policy

Below you will find information of legal relevance when visiting this website. In addition, you will find our Privacy Policy, which explains what kind of information may be gathered and processed, and how we may use "cookies" when you visit or make a purchase from <a href="https://www.pneumatics.ie">www.pneumatics.ie</a>, <a href="https://www.flomax.ie">www.flomax.ie</a> and <a href="https://www.thermelec.ie">www.thermelec.ie</a> (the "Site"). We thank you for reading the contents of this page, and, by accessing or using the website, you accept all terms and conditions.

## 1. PERSONAL INFORMATION WE COLLECT

We will not collect your personally identifiable information without your knowledge and permission, nor will we sell or rent any such data. In order to provide you with a specific product, service, or information or to process a transaction, we may request your personally identifiable information. This information may for example include your name, title, shipping address, billing address, e-mail address, telephone numbers, telefax numbers, and/or credit card information. Personally identifiable information is only collected when necessary to provide a product, service, or information, process a transaction, or if you submit it to us for other purposes, for instance if applying for employment.

### 1.1 Lawful bases for processing personal data:

According to Article 6(1) of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679), we would like to inform that we will proceed with the use of the two lawful bases for processing personal data below varying in different circumstances:

- (a) Consent: the individual has to give clear consent for us to process their personal data for a specific purpose. Consent must be:
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party.

There will be occasions when we understand that there is a relationship between P.I. Pneumatics Limited and the other party (parties) or to pursue our legitimate business interests, then Legitimate Interest bases will be applied.

#### 1.2 Device Information

When you visit the Web Sites, we automatically collect certain information about your device, including information about your web browser, Operating Systems, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as "Device Information."

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <a href="http://www.allaboutcookies.org">http://www.allaboutcookies.org</a>.
  - "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
  - "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

#### 1.2.1 Cookies

When you visit our website, we may send "cookies" to your computer. A cookie is a small text file or piece of data that a website that you visit can place or save onto your computer. Cookies do not themselves contain any personally identifiable information. However, if you provide such personally identifiable information to us (such as by registering for an Internet related service or password provided by us), such information may be linked to the data stored in the cookie. There are two types of cookies. The first type saves a file for a longer period of time onto your computer, and it can remain on your computer after you shut it off. Such cookie could, for example, be used to tell a visitor what information on the website has been updated since his or her last visit to that website. The second type of cookie is called "session cookie." While you are visiting a website, session cookies are temporarily stored in your computer's memory. This could be done, for example, to keep track of what language you have chosen at the website. Session cookies are not stored for a long period of time on your computer, since they disappear when you close your web browser. We may use third parties to assist us in collecting or processing information obtained through cookies.

We may use cookies for a number of reasons, such as:

- to compile anonymous statistics related to patterns and trends of browsing;
- to analyse sales data;
- to conduct marketing research;
- to user adapt website content or functions;
- to provide assistance to, or track site visits of users, of certain Internet-based services;
- to enable users with passwords to re-enter certain web pages without having to re-type previously typed information.

### How to avoid cookies

With most Internet browsers, you can set the browser to block cookies, erase cookies from your computer hard drive, or notify you that a web page contains cookies before a cookie is stored. Please refer to your browser instructions or help screen to learn more about these functions. Please note that some of our web pages may not work properly without the use of cookies.

#### 1.2.2 Copyright

The visual appearance of this website and the contents of these web pages (including but not limited to text, images, and audio-visual elements) are copyright of P.I. Pneumatics Limited (or its subsidiaries where so indicated and/or its licensors). The content is also protected by unregistered community design. All rights reserved.



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## 1.2.3 Trademark rights

Unless otherwise indicated, all trademarks, brand names, corporate logos and emblems displayed on the site are the property of Pneumatics, its affiliates, its licensors or joint venture partners.

Pneumatics' trademarks, brand names, corporate logos and emblems may not be used any way without the prior written permission from Pneumatics.

## 1.2.4 No liability, warranties

Information on the site is provided "as is" and "as available" without any express or implied warranty of any kind. In no event will Pneumatics be liable to any party for any direct, indirect, special or other consequential damages for any use of the site, or on any other hyperlinked web site including, without limitation, any lost profit, business interruption, loss of programs or data on your handling system, or otherwise, arising out of the use of or inability to use the information, even if Pneumatics is advised of the possibility of such damages.

Pneumatics makes no warranties or representations whatsoever about any other web site which you may access through the site. Such are provided only as a convenience and does not mean that Pneumatics endorses or accepts any responsibilities for the contents or the use of such web sites. In addition, it is up to you to take precautions and to ensure that whatever you select for your use is free of such items as viruses, worms, Trojan horses and other items of a destructive nature.

Further, Pneumatics does not warrant the accuracy or completeness of the information, text, graphics, links or other items that may be contained on the site. The information contained on the site may be changed at any time without prior notification. However, Pneumatics makes no commitment to update the information or other material contained on the site.

Pneumatics assumes no responsibility for material owned, created or published by third parties that Pneumatics' web pages contain a link to. By linking to such third-party site, you shall review and agree to that site's rules of use before using such site. A link to a non-Pneumatics site does not imply that Pneumatics endorses the site and the products or services referenced in such third-party site.

## 1.3 Order Information

Additionally, when you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number. We refer to this information as "Order Information."

## 1.4 Subscription Information

We collect and hold your information when you subscribe and give your consent to receive our newsletter, offers and other e-mail marketing types. But you will always be given the right to edit and 'unsubscribe' whenever you require.

## 1.5 'Contact us' page

If you send us a message through our website, your information will be also kept on our Database.

#### 1.6 Live Char

If you use our Live Chat to talk to us your information will also be kept.

#### 1.7 Other Data

- Phone Calls
- Direct Emails between Representative and
- Quote requests
- Direct Contact (face to face) with sales representatives
- Events/Fairs
- If you supply us with any product or service
- If you work for us or have applied for a job.

Your information will be kept on our database/CRM.

## 1.8 Social Media Pages

If you like/follow our page and if you contact us through our Social Media pages (Facebook, Twitter, LinkedIn) your information might be kept on our database as well.



#### 2 HOW DO WE USE YOUR PERSONAL INFORMATION?

## 2.1 Device Information (Legitimate Interest)

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

The information is aggregated to provide broad demographic information, such as the geographic location of visitors and how long they stay on our site. Collecting this type of information allows us to administer our site, diagnose server problems, analyse trends and statistics, and provide better customer service.

The 'device information' will be also used for our Google AdWords Campaigns.

## 2.2 Order Information (Legitimate Interest)

We use the Order Information that we collect generally to fulfil any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information. Additionally, we use this Order Information to: Communicate with you; Screen our orders for potential risk or fraud.

#### 2.3 Subscription Information (Consent)

When in line with the preferences you have shared with us and most importantly, your consent, to provide you with information or advertising relating to our products or services

## 2.4 'Contact us' page (Legitimate Interest)

If you send us a message through our website, we use your Information to: Communicate with you; Screen our customer service and keep our quality level up to our standards.

#### 2.5 Live Chat (Legitimate Interest)

If you use our Live Chat to talk to us your information will also be kept.

## 2.60ther Data (Legitimate Interest)

- Phone Calls
- Direct Emails
- Quote requests
- Direct Contact (face to face) with sales representatives
- Events/Fairs
- If you supply us with any product or service
- If you work for us or have applied for a job

Your information will be kept on our database/CRM.

## 2.7 Social Media Pages (Legitimate Interest)

If you like/follow our page and if you contact us through our Social Media pages (Facebook, Twitter, LinkedIn) your information might be kept on our database and used for internal customer services quality control, marketing strategies and also so we can communicate with you.

## 3 SHARING YOUR PERSONAL INFORMATION

## 3.1 Who personally identifiable information may be shared with

If you provide personally identifiable information to us, we will not disclose your personally identifiable information to any third party without your consent, unless required to do so by law, or unless we in good faith believe such action is necessary to (i) perform a task carried out in the public interest, or (ii) to defend our rights or property or those of any other Pneumatics entity or affiliate. However, in order to fulfil your requests, provide you with a product, service or information, to process a transaction, or to provide you with customer service, your personally identifiable information may be shared with other Pneumatics entities and third parties including but not limited to shipping companies, suppliers, distributors, financial institutions, our business partners, and postal or government authorities (such as Customs authorities). Any such other Pneumatics entity or third party may be located within or outside the European Economic Area. In accordance with the above, if you submit personally identifiable information, you voluntarily consent to transfer of such information to other countries, including countries within or outside of the European Economic Area.

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Sage and Sage Pay to power our online store--you can read more about how Sage uses your Personal Information here: https://www.sagepay.ie/policies/privacy-policy. We also use Google Analytics to help us understand how our customers use the Site--you can read more about how Google uses your Personal Information here: https://www.google.com/intl/en/policies/privacy/. You can also opt-out of Google Analytics here: https://tools.google.com/dlpage/gaoptout.

## 3.2 To remove, correct, update or access your personally identifiable information

If you would like to remove, correct, update, or access your personally identifiable information that you have submitted to us, or if you have any related concerns, please contact us on <a href="https://www.flomax.ie/contact/contact.aspx">https://www.flomax.ie/contact/contact.aspx</a> or on our phone +353 01 456 8111. If you contact us in this regard, please note the web page name or location where you submitted the information, as well as the contact information (for instance name, e-mail address, postal address, etc.) that you provided at that time.

## 3.3 The rights of the individual

Under the two lawful bases quoted above (Consent and Legitimate Interest) P.I. Pneumatics Limited take full responsibility for always ensuring people's rights. The GDPR provides the following rights for individuals:



- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

#### 3.4 Behavioural Advertising

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work.

Also, you can opt out of targeted advertising by:

- Facebook <a href="https://www.facebook.com/settings/?tab=ads">https://www.facebook.com/settings/?tab=ads</a>
- Google https://www.google.com/settings/ads/anonymous
- Bing https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: http://optout.aboutads.info/.

## 4. SECURITY

Technical and administrative measures are implemented to help protect personally identifiable information and other data on our servers from unauthorized access, loss, or alteration. However, no server or transmission over the Internet can be guaranteed to be one hundred percent secure. Therefore, any activity or communication is conducted at your own risk.

Some of our security actions are listed below:

- Multiple passwords: Our database is password protected and has limited access to only few people in the company.
   Our database is kept in Dropbox and it also requires another password to be accessed.
- Server authentication, and encryption of all client/server communication.
- Regular backup of personal data is automatically enforced.
- Internal Processes (old versions are kept during a certain period) to ensure the ability to restore the availability and access to data in a timely manner in the event of a physical or technical incident.
- Privileged accounts are not used for daily tasks. Login by privileged users is possible only from dedicated devices and limited only to authorised persons.
- Access to sensitive/personal data is controlled and limited only to persons that need to access them.
- Pneumatics' Staff Handbook periodically updated in order to keep all our processes and policies clear and active. And
  ensure the ongoing confidentiality, integrity, availability and resilience of systems and services processing personal
  data
- Letter of Offer and Terms and Conditions given to all staff when the job is offered.
- Data Processor Agreement between interested parties used to explain our Privacy Policy.
- Statutory business records are archived and secured stored offsite by a legitimate records storage company.
- Internal process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.
- Antivirus software that provides malware protection.
- Antivirus software that provides email and browser protection.
- Our enterprise computer network is protected by a firewall.
- Our enterprise Wi-Fi network is password protected.
- Remote access to our enterprise computer network is possible only via a virtual private network (VPN).
- Data leakage prevention software is used to protect sensitive/personal data.
- Procedures for monitoring, detecting, analysing and reporting of security incidents are developed and communicated within the enterprise.

## 5. LINKS TO THIRD PARTY WEBSITES

Some of our web pages may contain links to third party websites. Please note that we are not responsible for the privacy policies, content, or practices of such other websites or their owners or operators.

#### 6. DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

## 7. MINORS

The Site is not intended for individuals under the age of 18 and we do not keep the individual information when the individual is under the age of 18 years old. Our social media pages are in accordance with the providers age limit policies.

### 8. CHANGES

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## 9. CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at <a href="mailto:media@pneumatics.ie">media@pneumatics.ie</a> or by mail using the details provided below:

