



## Privacy Policy

Please read this Privacy Policy carefully before accessing or using our services. Aqueduct – The Well Water Ltd. (TWW) or any of its Group Companies may modify this agreement at any time, and such modifications shall be effective immediately upon posting of the modified agreement. Advertiser terms and conditions form part of our general terms for use of the Site. We also have a privacy policy for users.

### Privacy Policy – Introduction

TWW is a water cooler Franchise specialising in the design, manufacture and placement of patented water dispensers, water bottles and bag in box water boxes and ancillaries (Cups/uniforms/etc.) with end users and with a growing network of water resellers or direct branded Franchisees. TWW is committed to protecting your privacy. This Privacy Policy explains the steps we take to ensure that the information about you is kept secure and confidential, and is only used for the purposes for which it was originally intended. Please read this Privacy Policy carefully to understand how your personal information will be treated and processed. By using our website or submitting any personal information to us, you will be deemed to have read this Privacy Policy. If you register with us, please understand that we process your data as detailed in this policy.

### TWW as a Data Controller

We are at all times bound by the provisions of the Data Protection Act (2003), and from May 2018 the provisions of the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). TWW is a registered Limited Company (Company Registration No. 544775). We will deal with the Irish Office of the Data Protection Commissioner as the Lead Supervisory Authority for regulating all data protection matters within the Organisation as required. All personal information provided to us is 'personal data' under the Data Protection Act and the new General Data Protection Regulation (GDPR) guidelines and principles. When processing your data we follow the principles and guidelines as set out in the Data Protection Act and GDPR act. If you have any questions relating to this Privacy Policy or how we use the personal information we have about you, please contact Kieran McKenna as TWW senior representative with responsibility for Data Protection within TWW at [kieran@thewellwater.ie](mailto:kieran@thewellwater.ie) and reference GDPR in the subject line.

### Use and Collection of your Personal Data

TWW collects and uses your personal data for the purpose of customer service, order fulfilment, product education and general marketing. As a company that has developed a new and innovative Bag in Box (BIB) water cooler which most prospective clients are not aware of, we gather and analyse information on purchasing, office management or other individuals who influence company purchasing decisions. We do so as we have a legitimate interest in this field and this is a business necessity to be able to develop the TWW Business. When you submit any personal information to us, we will acknowledge your information by contacting you directly with information about next steps and include a link to our privacy policy. We will only collect personal information such as your email address, name, address, telephone number, Social Media or Media presence. We also make a note of relevant interactions with you.

We collect this information so that we may provide you with a reliable and efficient service in assisting you in your informed purchasing decisions and to enable us to support you. This may include evaluating your details and hydration requirements, storing your data on file for future interactions, providing support, ongoing interactions, and with your permission engaging with

third parties where we or our client require it to deliver requested services such as contracted storage and delivery.

We reserve the right to assign your data to a third party in the event of a sale, merger, liquidation, receivership or transfer of all the assets of our company in circumstances where the third party agrees to observe the terms of this Privacy Policy. TWW will notify you of such circumstances and you will be given the opportunity to opt-out.

### **Who can access your data?**

Your information, in the furtherance of us providing you with an efficient service, will be reviewed and shared by consultants working within the TWW organisation. We may from time to time be required to pass on your personal information to third parties who interact with the business (Consultants, insurance broker, accountants, or other relevant professionals) but we will only do so in the event that they agree to abide by our confidentiality provisions. Your personal data is wholly stored and processed within the European Economic Area.

Where your personal information is required to be sent outside the European Economic Area we will contact you for your permission prior to the disclosure of your personal information. In the event that we need to transfer your personal information outside the European Economic Area we will take the appropriate steps to guarantee that your privacy rights continue to be protected as detailed in this Privacy Policy.

### **Existing Data Information within TWW**

We will use our best endeavours to guarantee that all Personal Data that you have submitted to us is maintained and up to date. However, it is your responsibility to inform us of any changes to your Personal Data to ensure that it is up to date. We retain information regarding our clients and prospects for the duration of individuals' careers and this can be for up to 40 years. The data that we hold is reviewed and cleansed on an ongoing basis.. We will also get in touch with you periodically in order to ensure the data we have is up to date. Where we hold information about you, you have the right to request access to your data in a clear and readable format; and to rectify, modify, update or erase your data.

We will provide you with a copy of all personal information we hold about you within a month of such request and in accordance with the relevant Data Protection legislation. All such deletions and data updates should be sent to [kieran@thewellwater.com](mailto:kieran@thewellwater.com) as the Data Representative for TWW. We may only refuse your request where we are legally obliged to do so. Where your request has been refused we will provide you with reasons for this refusal. We will then hold such data for only as long as it is necessarily required by law. In the case of data deletions, we have a deletions policy. Please note that all data access requests will be subject to identity checks for security reasons to safeguard against inappropriate data disclosures.

### **Security of your Personal Information**

We are committed to the protection of Personal Information submitted to us. Privacy and security are of utmost importance to TWW and we have put in place suitable control measures to protect against potential threats to your data. These include physical and electronic procedures along with periodic managerial reviews in order to maintain data privacy standards. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure. While TWW takes all due care in ensuring the privacy and integrity of the information that you provide, we recognise that no data transmission over the Internet can be guaranteed to be 100% secure. The possibility exists that this information could be unlawfully observed by a third party while in transit over the Internet. TWW accepts no liability should this occur.

### **Cookie Policy**

We use Cookies which are small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at [the About Cookies website](#) which offers guidance for all modern browsers.

TWW also gathers information on all our users of our website on an aggregated basis. This information is used to analyse what the total usage levels are for the site, what areas of the site

are most popular and what times of the day are most popular for using the site. This information is used to determine what improvements we can make going forward. This information is not passed to our clients and the data is used for internal purposes only. We also periodically conduct marketing activities. Our marketing activities include telephone, direct mail and email campaigns to those on our database and we call prospective customers and update our database accordingly to avoid duplication. This data is not passed on to any external parties and the sole purpose is for maintaining engagement with our contacts or prospects.

### **Changes to this Privacy Statement**

Where a change is made to this Privacy Policy it will be set out on our websites to ensure that you are aware of what information we collect and how we will use it. If we plan to use Personal Data in a way that is inconsistent from that stated in this Privacy Policy, we will inform you in advance and it will be your decision as to whether or not you are happy that we continue store and process your information.

This privacy policy is effective from 18/05/18.