

EXTERNAL PRIVACY NOTICE

1. Introduction

Global Water Solutions Ltd with its registered office in the Channel Islands at 5th floor, 37 Esplanade, St. Helier, Jersey, JE1 2TR and our subsidiaries (“we”, “us” and “our”) takes the confidentiality and security of personal data very seriously.

We are a “controller” for the purposes of the General Data Protection Regulation 2016/679 (“GDPR”). We are committed to protecting your privacy and processing your personal data fairly and lawfully in compliance with the GDPR and other applicable data protection laws.

In the course of our business we may need to gather and use “**Personal Data**” about you, by which we mean any information about you from which you can be identified, such as your name, phone number, email and financial account information. We may also collect certain information about you when you use this website, for example, if you submit a request for further information. The purpose of this privacy notice (“**Privacy Notice**”) is to inform you of how we will process your Personal Data and the measures and processes we have put in place to ensure its adequate protection.

2. Fair and lawful processing

We will only process your Personal Data, where:

- a) you have given your consent to such processing (which you may withdraw at any time, as detailed at paragraph 9 below);
- b) the processing is necessary to provide our services under a contract with you;
- c) the processing is necessary for compliance with our legal obligations; and/or
- d) the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal data.

By “**processing**”, we mean the collection, recording, storage, use, disclosure and any other form of operations or dealings with your Personal Data.

3. What personal data we collect about you

1. We typically process the following types of Personal Data about you:

- a) Your name, work email address and other work contact details;
- b) Your role, position and/or job title within your employment;
- c) Your area of employment (e.g. marketing, sales, procurement);
- d) Details of your preferences for types of marketing events; and
- e) Details of your visits to our premises.
- f) Images may be collected by CCTV or on-site cameras at Global Water Solutions’ premises for the purposes of safety, security and to manage incidents.

2. In certain circumstances it will be necessary for you to provide us with your Personal Data, to enable us to manage our operations, to provide services to you and/or your employer, or to comply with our legal obligations. In other circumstances, it will be at your discretion whether you provide us with Personal Data or not. However, failure to supply any of the Personal Data we request may mean that we are unable to maintain or provide services or products to you and/or your employer.
3. We make every effort to maintain the accuracy and completeness of your Personal Data which we store and to ensure all of your Personal Data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your Personal Data or if you become aware that we have inaccurate Personal Data relating to you (see paragraph 9 below). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provide to us.
4. Event photography and filming

We may occasionally photograph and/or film company events such as trade shows, customer visits, factory visits, company meetings, product demonstrations or whilst you carry out your job. We will display notices at the venue to inform you for this. Where we are unable to display a notice, we will notify you by alternative means such as email, prior to the event.

We may publish these photographs and videos (which may include images of you) on publicly available websites and platforms such as the Global Water website, YouTube, Facebook and LinkedIn. We rely on our legitimate interests of raising awareness of our business activities and products in order to process your images and recordings. If you do not want to be included in photographs or films please let us know in advance of any event by emailing us at privacy@globalwatersolutions.com or at the event.

4. How we collect personal data

We usually collect your Personal Data from the information you submit during the course of your, or your employer's, relationship with us. This will typically be through you sending us emails and other correspondence, business cards, the forms and documents used when you sign up to our marketing or market data news lists, when you are named as an authorised person to trade on behalf of your employer, the sign up information you use to access any of our products or services either on your own behalf or on behalf of your employer.

5. How we use personal data

We will process your Personal Data in connection with our relationship with you or your employer for the following purposes:

- a) for monitoring and assessing compliance with our policies and standards;
- b) for promotional and marketing materials and activities, including photos and videos, (you can ask us not to use your Personal Data for these purposes at any time);
- c) to carry out background and credit checks and for fraud and crime prevention and detection purposes;
- d) to provide your employer with requested products or services;
- e) to identify persons authorised to trade on behalf of our customers, suppliers and/or service providers;

- f) for administrative purposes in relation to the security and access of our systems, premises, platforms and secured websites and applications;
- g) to contact you about the services and products we offer (where we have received your consent to do so, or we believe that you may be interested in the material as it relates to similar products or services you have previously acquired, or indicated your interest in acquiring, from us);
- h) to comply with our legal and regulatory obligations; and
- i) to comply with court orders and exercise and/or defend our legal rights.

6. International transfers of personal data

The Personal Data we collect from you may be transferred to (including accessed in or stored in) a country or territory outside the European Economic Area (“**EEA**”), [including to countries whose laws may not offer the same level of protection of Personal Data as are enjoyed within the EEA.

We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the GDPR. Copies of the relevant safeguard documents are available on request at the contact details below.

7. When we may disclose your personal data

We do not and will not sell, rent out or trade your Personal Data. We will only disclose your Personal Data in the ways set out in this notice and, in particular, to the following recipients:

- a) to our Group Companies;
- b) to third parties who process your Personal Data on our behalf (such as our professional advisors including, lawyers, accountants and auditors and our third party service providers including cloud providers);
- c) to third parties who process your Personal Data on their own behalf but through providing us or your employer with a service on our behalf (such as our transport and delivery contractors);
- d) to any third party to whom we assign or novate any of our rights or obligations;
- e) to any prospective buyer in the event we sell any part of our business or assets; and/or
- f) to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

8. How we protect your personal data

We are committed to safeguarding and protecting Personal Data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any Personal Data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

9. Your rights in relation to the personal data we collect

1. You may have rights under European and other laws to have access to your Personal Data and to ask us to update, modify, delete and restrict the use of the Personal Data that we hold on you. You may also have right to object to your Personal Data being used. We will

honour your rights under applicable data protection laws. To exercise any of your rights please email us at the address set out below. We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

2. In any of the situations listed above, we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data.
3. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your Personal Data, and for any additional copies of the Personal Data you request from us.

10. How long we will hold your personal data for

We will only retain your Personal Data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements, as outlined in our Data Retention Policy.

11. How we update or change this privacy notice

1. We may change or update parts of this Privacy Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this Privacy Notice on our website www.globalwatersolutions.com. You will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Notice so you are fully aware of any changes or updates.
2. This Privacy Notice was last updated on [May 1, 2020].

12. How you can contact us

If you have any queries about the contents of this Privacy Notice, or wish to inform us of a change or correction to your Personal Data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please send an email to privacy@globalwatersolutions.com

HOW TO LODGE A COMPLAINT TO THE REGULATOR

If you are not satisfied with how we have responded to a request or dealt with a complaint, you can lodge a complaint with our data protection regulator. You are entitled to lodge a complaint with the data protection regulator in your home country if you consider that we have breached your data protection rights.

In Italy, the data protection regulator is Garante per La Protezione Dei Dati Personali, which can be contacted at Piazza di Monte Citorio, 121 – 00186 Roma.

In Jersey, the data protection regulator is the Office of the Information Commissioner, Jersey, which can be contacted at Brunel House, Old Street, St Helier, Jersey JE2 3RG.

In Luxembourg, the data protection regulator is the National Commission for Data Protection which can be contacted at 1, avenue du Rock'n'Roll L-4361 Esch-sur-Alzette or on line at <https://cnpd.public.lu/en/particuliers/fairevaloir/formulaire-plainte.html>.

In the United Kingdom, the data protection regulator is the Information Commissioner's Office which can be contacted on-line at <https://ico.org.uk/global/contact-us/email/>.