



PRIVACY POLICY

THIS WEBSITE IS BROUGHT TO YOU BY ASPEN PUMPS LTD. WE TAKE THE PRIVACY OF OUR WEBSITE USERS VERY SERIOUSLY.

This is the Privacy Policy for **Aspen Pumps Ltd**, a company incorporated and registered in England and Wales with company number 08291827 whose registered office is at Apex Way, Hailsham, East Sussex BN27 3WA ("**Aspen**" "**we**" or "**us**").

Introduction

This Privacy Policy sets out how Aspen uses and protects any personal data that you provide to Aspen (including personal data provided through the website <https://www.2emmeclima.com> ("**Website**"). Aspen sells its products and provides services to its business clients (or potential clients) on a worldwide basis ("**Services**"). In addition to this, the Website also collects certain personal data from users. For example, we will obtain your personal data when you register to use this website, send us feedback, post material, contact us for any reason, sign up to a service, enter a competition, purchase goods or services. We detail all of the reasons we may collect your person data later on in this Privacy Policy.

It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Children

The Website is not intended for children and Aspen will not knowingly collect any personal data from persons under the age of 18 and will immediately delete any such data subsequently so determined.

Who we are

Aspen and its affiliated Group companies and brands ("**Aspen Pumps Group**") are firmly committed to respecting and protecting the privacy of all personal data received or collected, in strict adherence to Data Protection Legislation (defined below) and best business practice.

The Aspen Pumps Group is made up of different legal entities, details of which can be found: <https://www.aspenpumps.com/en-gb/about-group>. This Privacy Policy is issued on behalf of the Aspen Pumps Group so when we mention Aspen, we are referring to the relevant company in the Aspen Pumps Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Aspen Pumps Ltd is the controller and responsible for this website.

The Aspen Pumps Group has established this Policy so that you can understand the care with which we intend to treat personal data, as a standard. Although legal requirements may vary from country to country, the Aspen Pumps Group intends to adhere to the principles set out in this Privacy Policy even if, in connection with the above, we transfer your personal information from your country to countries outside of the EEA that may not require a high level of protection for your personal information.

How to contact us

If you have any questions regarding your personal data and how we may use it, including any queries relating to this Privacy Policy, please contact us at GDPRinfo@aspenpumps.com or writing to the "Data Protection Manager" at the office address noted above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Policy and Terminology

It is important that the personal data we hold about you is accurate and current. Please keep us (or if you are an employee of one of our clients, where appropriate) informed if your personal data changes.

We keep our privacy policy under regular review. This version was last updated on 11/03/25.

When we refer to **Data Protection Legislation**, we mean all applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

Controller or Processor

The terms 'Controller' or 'Processor' are as determined under the Data Protection Legislation.

Where personal data is provided directly to Aspen through use of the Website, email, or other means where Aspen is determining the way in which that personal data is processed for its own use, then Aspen will be a data controller of such information.

Where Aspen is provided personal data in its capacity of providing services to its clients, then Aspen will only process that personal data in accordance with the instructions of its clients and Aspen will therefore act as a data processor in respect of such personal data; Aspen's client will be the data controller of that personal data for that purpose and will be responsible to data subjects for the way in which their personal data is processed as the data controller.

Where Aspen acts as a data processor on behalf of its clients, Aspen will process that personal data on the instructions of its clients, who would have collected that personal data in accordance with that client's own privacy policy. Individuals who have contracts with our clients should therefore check that client's own privacy policy, to ensure they understand how their personal data may be processed.

Third Party Links

The Website may, from time to time, contain links to and from the websites of Aspen partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Aspen is not responsible for the content of external internet sites and you are advised to read the privacy policy of external sites before disclosing any personal data.

The Data we collect about you

Personal data means any data or information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Where Aspen is acting as a data controller, Aspen may collect, use, store and transfer different kinds of personal data about you which Aspen has grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, job title and date.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Usage Data** includes information about how you use Aspen's Services or submit an enquiry or query through the Website.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Financial Data** includes bank account and payment card details.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Subject to where Aspen needs to verify your identity and you provide your express consent for Aspen to process such information, Aspen does not process any Special Category personal data (as defined by Data Protection Legislation) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor does Aspen collect any information about criminal convictions and offences.

If you fail to provide personal data

Where Aspen needs to collect personal data by law, or under the terms of a contract Aspen has with you (or our client whom Aspen acts for) and you fail to provide that data when requested, Aspen may not be able to perform the contract it has or is

trying to enter. In this case, Aspen may have to cancel the Services but it will notify you (or where appropriate, its client) if this is the case at the time.

How is your personal data collected?

Aspen uses different methods to collect personal data from and about you including through:

- Direct interactions. You may give us your contact information by filling in forms or by corresponding with us by post, phone, email, online or otherwise. This includes personal data you provide when
 - Aspen provides its Services;
 - You liaise, in-person, with our staff who may record that interaction;
 - create an account on our website;
 - subscribe to any service or publication;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as:
 - Contact data from providers
 - Internet / websites.
- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://www.aspenpumps.com/en-gb/cookie-policy> for further details.
- Technical Data from the following parties:
 - (a) analytics providers such as Google and Microsoft, based outside the UK;
 - (b) advertising networks such as Google and Meta, based outside the UK; and
 - (c) search information providers such as Google, based outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

How Aspen uses your personal data

Aspen will only use your personal data when the law allows us to, i.e., if we have a legal basis for doing so, as outlined in this Privacy Policy or as notified to you at the time we collect your personal data, and for the purposes for which it was collected for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do this. Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Please see the **Glossary** to find out more about the types of lawful basis that we will rely on to process your personal data.

Where we act as the data controller for client contact information, we have set out below in the table a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purpose for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact Aspen if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage (c) Identity	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, prioritise improvements and new features and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Where we act as a data processor of personal data on behalf of our clients, we will process personal data in accordance with our clients' instructions, or in order to comply with a legal or regulatory obligation.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third Party Marketing and Opting Out

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

How your personal data may be shared

Where we act as the data controller for client contact information, or where permitted by Aspen's data controller clients, personal data processed by Aspen may be shared as follows:

- with any member of the Aspen Pumps Group, which means Aspen's subsidiaries, Aspen's ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- with permitted third party contractors of Aspen for the purposes of performing its Services, help us to deliver our products and information ("Data Processors" or "Sub-Processors");
- where Aspen is under a duty to disclose your personal data to comply with any legal obligation, or to enforce or apply Aspen's or terms and conditions and other agreements;
- to protect the rights, property, or safety of Aspen, Aspen's client, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and for compliance with laws; or
- with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

Where we provide your personal data to Data Processors or Sub-Processors we will have in place a written agreement with each third party confirming on what basis the third party will handle your personal data and will ensure that there are sufficient safeguards and processes in place to protect your personal data. We require all third parties to respect the security of your personal data and to treat it in accordance with the law and only process that personal data in accordance with our (or our client's) instructions. The third parties that we may send your personal data to are either within the European Economic Area ("EEA") or to third parties under suitable protection mechanisms as laid out in applicable Data Protection Legislation.

International Transfers

We are part of a Group of companies with offices worldwide. Details of where we're located can be found at : <https://www.aspenpumps.com/en-gb/about-group>.

From time to time we may transfer your personal data from within the EEA to our offices outside of the EEA, such as those listed above, or other countries where we have put in place adequate security measures to ensure your personal data will be handled in a way that matches applicable Data Protection Legislation, so that where your personal data is being transferred to one of our global companies it will be processed in line with our EEA-based companies, regardless of which country they are in (even if they are outside of the EEA).

Separate to the above, we may also transfer your personal data to countries outside of the EEA to other people or companies for one of the legal bases for processing your personal data as indicated above, or at the request of our data controller clients. Where we do so, we will take all steps to ensure that any country to which the personal data has been transferred has suitable protection mechanisms in place to protect personal data, including (if applicable) use of EU Model Clauses or an International Data Transfer Agreement in any contract with that third party for steps to be taken to keep personal data secure.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Data security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed and have an Information Security Policy in place to which we adhere to. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Personal Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We will only retain personal data in accordance with our retention policy, which includes:

- where we act as a data controller in connection with client contact information, for as long as necessary to fulfil the purposes we collected it for;
- where we act as a data processor on behalf of its clients, for the period notified to Aspen by the data controller client;
- in either case, for the period required for the purposes of satisfying any legal, accounting, regulatory or reporting requirements.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These are detailed within the Glossary. Please click on the links below to find out more about these rights:

- [\[Request access to your personal data\].](#)
- [\[Request correction of your personal data\].](#)
- [\[Request erasure of your personal data\].](#)
- [\[Object to processing of your personal data\].](#)
- [\[Request restriction of processing your personal data\].](#)
- [\[Request transfer of your personal data\].](#)
- [\[Right to withdraw consent\].](#)

To exercise any of the above rights please email your request to: GDPRinfo@aspenpumps.com

Where you exercise your right to erasure (and we do not have another legal basis to hold on to that personal data) or where information is deleted in accordance with Aspen's retention policy, please note that after the deletion of your personal data, it cannot be recovered, so if you require a copy of this personal data, please request this during the period Aspen retains the data.

Where you exercise your right to request access to the information Aspen processes about you, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. Aspen will try to respond to all legitimate access requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we may, under Data Protection Legislation, extend the time period with which we have to reply by a further two months. We will always notify you and keep you updated in respect of any change in the timeframe we will respond by.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Complaints

If you would like to make a complaint in relation to how Aspen may have stored, used or processed your personal data, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). Aspen would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.2emmeclima.com/en/cookie-policy/>.

Remember the Risks Whenever You Use the Internet

Aspen is committed to ensuring that your information is secure and has in place reasonable and proportionate safeguards and procedures to protect your personal data. While Aspen does its best to protect your personal data, Aspen cannot guarantee the security of any information that you transmit to Aspen, and you are solely responsible for maintaining the secrecy of any passwords or other account information. Aspen will also respond to requests within the timeframe given to it as permitted by relevant UK data protection legislation.

Glossary

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

This Privacy Policy was last updated on 11/03/25.