HWM Global | Innovations that keep critical resources flowing.

HWM Global

Privacy Notice

HWM-Water Limited (t/a HWM Global) and HWM Companies (HWM Global)

November 2025

Under the EU's General Data Protection Regulation (GDPR) 'Personal Data' is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

HWM Global respects your privacy and is committed to protecting your Personal Data. This Privacy Notice will inform you as to how we look after your Personal Data, tell you about your privacy rights and how the law protects you.

1. Purpose of this Privacy Notice

1.1 This Privacy Notice aims to give you information on how HWM Global collects and processes your personal data.

1.2 We will comply with the GDPR. This says that Personal Data we hold about you must be:
1.2.1 - used lawfully, fairly and in a transparent way.
1.2.2 - collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
1.2.3 - relevant to the purposes we have told you about and limited only to those purposes.
1.2.4 - accurate and kept up to date.
1.2.5 - kept only as long as necessary for the purposes we have told you about.
1.2.6 - kept securely.

1.3 It is important that you read this Privacy Notice so that you are fully aware of how and why we are using your data.

2. Contact Details

2.1 Our full details are:
HWM-Water Ltd,
Llantarnam Park Way, Cwmbran, NP44 3AW. United Kingdom.

2.2 Our Data Protection Manager is Tim Hawkins. (dataprotection@hwmglobal.com).

2.3 The HWM Global companies include the following:

- ASL Holdings Ltd.
- Invenio Systems Ltd.
- Fluid Conservation Systems Inc.

3. Changes to the Privacy Notice and your duty to inform us of changes

3.1 It is important that the Personal Data we hold about you is accurate and current. Therefore, please keep us informed if your Personal Data changes during your relationship with us.

4. The Data we collect about you

4.1 We collect, use, store and transfer different categories of Personal Data about you which we have grouped together as follows:

- **Identity Data** – includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, passport number/details, driving licence number/details.
- **Contact Data** – includes billing address, delivery address, email address and telephone numbers.
- **Employment Data** – includes role/position, organisation (if not HWM Global), salary and start date.
- **Financial Data** – includes bank account, payment card details, pension data and payroll data.
- **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 our website or intranet.
- **Profile Data** - includes your username and password on our website, our intranet, purchases or orders made by you, your preferences, and feedback and survey responses.
- **Usage Data** - includes information about how you use our apps, website, intranet, products and services.
- **Marketing and Communications Data** – includes your preferences in receiving marketing from us and our third parties and your communication preferences.

4.2 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does 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 Notice.

5. Special Categories of Personal Data

5.1 Special Categories are details about:

- Your race or ethnicity.
- Religious or philosophical beliefs.
- Sex life or sexual orientation.
- Political opinions.
- Trade Union membership.
- Information about your health.
- Genetic and biometric data.

5.2 We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process

special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

5.3 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.

5.4 In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with employment or employment application. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and permanent health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment.
- If you leave employment and under any share plan operated by a group company the reason for leaving is determined to be ill-health, injury or disability, we will use information about your physical or mental health, or disability status in reaching a decision about your entitlements under the share plan.
- If you apply for an ill-health pension under a pension arrangement operated by a group company, we will use information about your physical or mental health in reaching a decision about your entitlement.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

5.5 We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

6. Information about Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our privacy information protection policy.

6.1 We do not envisage that we will hold information about criminal convictions unless you are an employee or contractor of HWM Global or as part of the recruitment process.

6.2 We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

6.3 Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us.

6.4 We will use information about criminal convictions and offences to determine your suitability for certain roles within HWM Global.

6.5 If you are employed by HWM Global, then we will continue to update and refresh any data and/or information in relation to criminal convictions should the DBS results expire.

6.6 We are allowed to use your personal information in this way to carry out our obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

7. If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services or employee benefits). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

8. We use different methods to collect data from and about you, including through:

8.1 *Direct Interactions*. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, and e-mail or otherwise. This includes Personal Data you provide when you:

- Apply for our products or services.
- Create an account on our websites.
- Subscribe to our services or publications.
- Request information (including marketing) be sent to you.
- Enter a promotion or complete a survey.
- Give us some feedback.
- Provide unsolicited information to us.
- Apply for employment with us.

8.2 *Automated Interactions*. As you interact with our website or intranet, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, and / or other similar technologies.

8.3 *Third Parties* (or publicly available sources). We may receive categories of Personal Data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google; advertising networks and search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers, aggregators or recruitment agencies.
- Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register.

9. How we use your Personal Data

9.1 We will only use your Personal Data when the law allows us to. 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 or regulatory obligation.

9.2 We may also use your Personal Data in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

9.3 Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending 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**.

10. Purposes for which we will use your Personal Data

10.1 We have set out below, in a table format, a description of all the ways we plan to use your Personal Data (which is not considered as special categories), and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

10.2 Please 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 us if you need additional 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	Category of Personal Data	Lawful basis for processing, including basis of legitimate interest
To register you as a new client, or customer.	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your service or 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) Usage (e) Marketing and Communications (f) Financial	(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, • to study how customers and clients 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; and • to develop them and grow our business.
To administer and protect our business and our intranet and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Profile (d) Technical (e) Usage	(a) Necessary for our legitimate interests • for running our business relationships, • 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 app & 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 apps, websites, products/services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	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; 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	Necessary for our legitimate interests • to develop our products/services; and, • to grow our business.

11. Marketing

11.1 We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. We have established the following Personal Data control mechanisms:

- Promotional material 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 products or our services from us and, in each case, you have opted-in to receiving that marketing.
- Third-Party Marketing:
  - We will get your express opt-in consent before we share your Personal Data with any company outside of HWM Global for marketing purposes.
- Opting out
  - 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.
  - 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, product/service experience or other transactions.
- Cookies
  - Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.
  - To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.

12. Change of Purpose

12.1 We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

12.2 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 so.

12.3 Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

13. Disclosure of your Personal Data

13.1 We may have to share your Personal Data with the parties set out below for the purposes set out in the table above:

- **Internal Third Parties** – other companies or departments in HWM Global acting as processors or joint controllers and provide IT and system administration services and undertake leadership reporting.
- **External Third Parties** – service providers acting as processors based who provide IT, learning, training and system administration services.
- **Other 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 Notice.
- **Professional Advisers** - acting as processors or joint controllers including lawyers, bankers, auditors, pensions advisors and insurers who provide consultancy, banking, legal, pension, insurance and accounting and payroll services.
- **HM Revenue and Customs** - regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

13.2 We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

14. International Transfers

14.1 Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your Personal Data will involve a transfer of data outside the EEA.

14.2 Whenever we transfer your Personal Data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US.

15. Data Security

15.1 We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

15.2 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.

16. Data Retention

16.1 We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

16.2 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 requirements.

16.3 In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

17. Your Legal Rights

17.1 Under certain circumstances, you have rights under data protection laws in relation to your Personal Data to request the following:

- Access to your Personal Data.
- Correction of your Personal Data.
- Erasure of your Personal Data.
- Object to processing of your Personal Data.
- Restrict to processing your Personal Data.
- Transfer of your Personal Data.
- Withdraw consent of any consent that you have previously given.

17.2 If you wish to exercise any of the rights set out above, please contact us. You can also contact the Information Commissioner's Office via https://ico.org.uk/ for information, advice or to make a complaint.

17.3 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.

18. What we may need from you

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.

19. Time limit to respond

We try to respond to all legitimate 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 will notify you and keep you updated.