



# Privacy Policy Statement

## Purpose of policy

This Privacy Policy sets out how Lowara Distribution Ireland collects, uses, stores, and safeguards personal data in accordance with the General Data Protection Regulation (GDPR) and Irish data protection legislation. Its purpose is to provide clear and transparent information on how we manage your personal information, your rights under the law, and the measures we take to ensure your data is treated with care and confidentiality.



IFS Template Reference: 1553318 Revision: 1

Name of Policy	Privacy Policy
Lowara Site	50 Broomhill Close, Tallaght, Dublin 24, D24 APP8, Ireland
Applicable Policies	<a href="#">Lowara Distribution Ireland Cookie policy</a> <a href="#">Lowara Distribution Ireland Cookie Declaration</a>
Last Updated	17/06/2025

## Lowara Distribution Ireland Privacy Policy

Tricel (Baldonnell) Ltd, trading as Lowara Distribution Ireland (hereinafter referred to as “Lowara Distribution Ireland” or “the Company”), is a company registered in Ireland under registration number IE497442, with its registered office at 50 Broomhill Close, Tallaght, Dublin 24, D24 APP8, Ireland.

### 1. Introduction

This policy outlines how we collect, use, and protect your personal data. When you visit our website, contact us by phone or online, or request information about our products and services, certain details may be collected and stored.

We are committed to protecting your information and ensuring transparency about how it is used. Personal data—such as your name, address, email address, or telephone number—is handled in accordance with the General Data Protection Regulation (GDPR) and any relevant national data protection laws applicable to Lowara Distribution Ireland.

This statement explains the types of personal data we collect, the purpose for which it is used, and how it is processed. It also outlines the rights you have in relation to your data.

For the purposes of data protection legislation, the Data Controller is Tricel (Baldonnell) Ltd, trading as Lowara Distribution Ireland, hereinafter referred to as Lowara Distribution Ireland. The company is registered in Ireland under number IE497442, with its office at 50 Broomhill Close, Tallaght, Dublin 24, D24 APP8, Ireland.

Please note that this privacy policy applies solely to our organisation. If you follow links to other websites, their own privacy policies will apply.

This privacy policy sets out how Lowara Distribution Ireland (“we”, “our”, or “us”) collects, uses, stores, and protects personal data. It also outlines the rights of individuals in relation to their data.

**This policy covers the following:**

- Name and address of the data controller
- Use of personal data and automated decision-making
- IP addresses and cookies
- Information we may collect from you
- Rights of the data subject
- Transferring and storing your data
- Legal basis for processing data
- Data retention periods
- Disclosure to third parties
- Recruitment
- Monitoring or recording communications
- Consent

## 2. Name and address of the data controller

The data controller responsible for managing personal data in compliance with GDPR and other applicable data protection laws is Tricel (Baldonnell) Ltd, trading as Lowara Distribution Ireland. Below are the details:

- Company Registration Number: IE497442
- Registered Office: 50 Broomhill Close, Tallaght, Dublin 24, D24 APP8, Ireland
- Phone: +353 (0)1 414 8824
- Email: [sales@ldireland.ie](mailto:sales@ldireland.ie)
- Website: [www.ldireland.ie](http://www.ldireland.ie)

Users can contact the data controller directly with any questions or concerns

regarding the handling of personal data.

### 3. Use of personal data and automated decision making

You can visit our website without giving away any personal information. Lowara Distribution Ireland Ltd. use Google Analytics and Cookies to improve our services and digital offerings, user experience and to analyse how the website gets used. Aside from the approximate location (IP address), the information gathered by Google Analytics is mostly anonymous traffic data that includes browser type information, device information and language information.

The information collected provides an overview of how people are accessing and using the action pumps website. It is not used for purposes such as automated profiling or automated decision making. As a responsible company, we do not use automatic decision-making or profiling.

### 4. IP addresses and cookies

The Internet pages of Lowara Distribution Ireland use cookies. Cookies are text files that get through an internet browser and stored on a computer.

Most websites and servers make use of cookies. Cookies contain a so-called cookie ID which is a unique identifier of each individual cookie. This ID consists of a character string sequence through which Internet pages and servers get assigned to the specific Internet browser in which the cookie gets stored.

The process of using cookies allows websites and servers to differentiate the individual browser which has previously visited from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using the unique cookie ID. This process helps us to provide you with an excellent experience when browsing our website and also allows us to improve our site. By continuing to browse the website, you agree to our use of cookies.

- **Strictly necessary cookies: These** are cookies required for the operation of our website. They include, for example, cookies that enable users to log into secure areas of our site, use a digital shopping cart or to make use of e-

billing services.

- **Analytical/performance cookies:** These are cookies that allow us to recognise and count the number of visitors as well as see how visitors navigate through the website when using it. These help to optimise the way our website works, for example, by ensuring that users find what they are searching for quickly and easily.
- **Functionality cookies:** These cookies are used to recognise you when you return to our website. This recognition, in turn, enables us to personalise our content for your experience and to remember your preferences.
- **Targeting cookies:** These cookies record your visit to our website, the pages you have visited and also, if any, the links that you have followed. We use this information to make our website continuously more relevant to your interests. We may also, at times, share this information with third parties for this purpose
- **Social Media cookies:** This website includes third-party social media features, such as the Facebook Like button, and third-party widgets, such as the 'Share This' button or interactive mini-programs that run on the Site. These features may collect your IP address and which page you are visiting on the Site, as well as set a cookie to enable the feature to function properly. Your interaction with these features is governed by the privacy policy of the third-party company providing it. Follow the links below to view the relevant parties Privacy Policies:

[Facebook Privacy Policy](#)

[Google+ YouTube Privacy Policy](#)

[Twitter Privacy Policy](#)

[LinkedIn Privacy Policy](#)

Using cookies, we optimise the information and offers on our website with the user in mind. We use cookies for the following;

- To estimate our audience size and usage pattern.
- Provide users of the website with more user-friendly services that would not be possible without the cookie setting.
- To store information about your preferences and so allow us to customise our site according to your interests.

- To speed up your searches.
- To recognise you when you return to our site.

You can also refuse to accept cookies by activating the setting on your browser and disabling the setting of cookies. However, if you do select this setting, you may be unable to access certain parts of our site. Unless you have adjusted your browser to the previously mentioned setting so that it refuses cookies, our system automatically issues cookies when you log on to our site.

Please note that third parties (including providers of external services like web traffic advertising and analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Furthermore, you can delete any previously set cookies at any time via an internet browser or other software programmes. This cleansing option is optional in all popular internet browsers. If the data subject does choose to deactivate the setting of cookies in the internet browser used, not all functions of our website may be entirely usable.

## 5. Information which we may collect from you

If you are visiting our websites or accessing our applications, we collect the following information provided by your browser or mobile device:

- Pages accessed.
- Time of visit.
- Time of last visit.
- Name of the owner of the IP address.
- Reverse domain of the IP address.
- Referring site, application, or service, including the relevant search queries that led you to Lowara Distribution Ireland's website.
- Browser information.
- Operating system and device information.
- IP address (from users signing in to the service, for security purposes).

We may also manage and process the following data about you:

- Information that you provide through the act of filling forms on our site. This collection includes information provided at the time of registering to use our site, subscribing to our service or requesting further services or posting material. We may also ask for information when you enter a competition or promotion sponsored by Lowara Distribution Ireland. or when you report a problem with our site.
- We may keep a record of correspondence if you contact us.
- We might ask you to complete surveys which we use for research purposes. However, you do not have to respond to them.
- Details of any transactions you carry out through our website and of the fulfilment of your orders.
- Details collected during your visits to our site. These details include, but is not limited to, location data, traffic data, weblogs or other communication data, whether this is required for our billing purposes or otherwise and the resources which you access.
- We make use of information which we hold about you in the following ways:
- To provide you with information, products or services that you request from us or which we feel may be of interest you, where you have consented to contact for such purposes.
- To ensure that content on our website is presented most effectively for both you and your computer.
- To carry out any obligations arising from contracts entered between you and us.
- To allow you to participate in interactive features of our service when you choose to do so.
- To provide you with marketing information about our products or services.
- To understand and analyse the usage trends and preferences of our visitors and users, to improve the service, and to develop new products, services and functionality.
- To, on occasion, notify you regarding changes to our services.

#### Communication:

- We may use a visitors or users email address or other information – other than client data – to contact that visitor or user for the following:

- Administrative purposes such as customer service, to address intellectual property infringement, the right to privacy violations or defamation issues such as those related to the client data or personal data posted on the service.
- With updates relating to promotions and events, products and services offered by us and third parties which we work with. You have the option to opt-out of receiving any promotional communications as described below under “Rights of the data subject” below.

## 6. Rights of the data subject

### The right of confirmation (right to be informed)

Each data subject has the power granted by the European legislator to obtain from the controller the evidence regarding whether or not personal data concerning him or her is being processed. If a data subject wishes to avail themselves of this right, he or she can contact our Data Protection Officer or another employee of the controller at any given time.

Our site may contain links to and from websites belonging to our partner networks, advertisers and affiliates. If, on any occasion, you follow a link to these websites, note that these websites have individual privacy policies. We do not accept any responsibility, or liability, for these policies. Please check these policies before you submit any personal data to these websites.

### The right of access to information

Every data subject has the right granted by the European legislator to obtain free information about his or her data stored at any time from the controller and to request, and receive, a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- The purposes of the processing of data.
- The categories of personal data concerned.
- The recipients, or types of recipients, to whom the personal data have been or are to be disclosed. This element relates in particular to recipients in third



countries or international organisations.

- Where possible, the period believed necessary for the personal data to be stored, or, in cases where this is not possible, the criteria used to determine that period.
- The right to request from the controller the correction or erasure of any personal data, or the restriction of processing of any personal data about the data subject, or to object to such processing.
- The existence of the right to lodge a complaint with supervisory authority.
- Where the personal data collected is not from the data subject, the relative source of any such available information.
- Access to data related to the existence of automated decision-making, including profiling and, at least in such cases, meaningful information about the logic involved. Also, information about the significance and possible consequences that such processing may have for the data subject.

The data subject also has the right to obtain information as to whether personal data gets transferred to any third country or an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she can contact our Data Protection Officer or another employee of the controller at any time.

### Right to rectification

Every data subject has the right granted by the European legislator to obtain from the controller without undue delay the correction of inaccurate personal data concerning him or her. The data subject, considering the purposes of the processing, shall have the right to have incomplete personal data completed, through the provision of a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she can contact our Data Protection Officer or another employee of the controller at any time.

### Right to erasure (Right to be forgotten)

Each data subject shall have the power granted by the European legislator to obtain from the controller the deletion of personal data concerning him or her

without undue delay. The controller shall have a duty to erase personal data in a timely manner as per the subject's request and inform other controllers that are also processing the data of said request where any of the following grounds apply, as long as the processing is not required:

- The personal data ceases to be required for to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based and also where there is no other legal ground for the processing.
- The data subject objects to the processing under Article 21(1) of the GDPR, and there are no overriding legitimate grounds for the processing or the subject data objects to the processing under Article 21(2) of the GDPR.
- In the event of the unlawful processing of personal data.
- The erasure of the personal data is necessary to comply with a legal obligation to which the controller is subject to within Union or Member State law.
- The personal data collected was regarding the offer of information society services referred to in Article 8(1) of the GDPR.

If any of the outlined reasons above apply, and a data subject wishes to request the erasure of personal data stored by Lowara Distribution Ireland , he or she can contact our Data Protection Officer or another employee of the controller at any time. The Data Protection Officer of Lowara Distribution Ireland . or another employee shall promptly ensure that the erasure request is complied with immediately.

In instances where the controller has made any personal data public, and an erasure request is submitted by the data subject, the controller must take all reasonable steps to inform other data controllers processing said personal data of the data subjects request for erasure. This includes any technical measures which may need to be employed and inclusive of the erasing of any links to or a copy of replication of those personal data as far as processing is not required. The Data Protection Officer of Lowara Distribution Ireland . or another employee will arrange the necessary measures in individual cases.

## Right to the restriction of processing

Each data subject shall have the power granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful, and the data subject opposes the erasure of the personal data and alternatively requests the restriction of their use.
- The controller no longer requires the personal data for the purposes of the processing but is necessary by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing (under Article 21 -1 of the GDPR) pending the verification whether the legitimate grounds of the controller override those of the data subject.

If any of the conditions outlined above are met, and the data subject wishes to request the restriction of the processing of personal data which is stored by Lowara Distribution Ireland . they can contact our Data Protection Officer or another employee of the controller at any time. The Data Protection Officer of Lowara Distribution Ireland or another employee will then arrange the restriction of the data processing.

## Right to data portability

Each data subject has the right granted by the European legislator, to receive the personal data concerning him or her, which initially was provided to a controller. Said data would be received in a structured, commonly used and machine-readable format.

They also have the right to transmit such data to another controller, and to do so without hindrance from the controller to which the personal data was provided as long as the processing is:

- Based on consent and the processing is carried out by automated means.
- As long as the processing is not necessary for the performance of a task carried out in the public interest or the exercise of official authority vested in

the controller.

Furthermore, in exercising his or her right to data portability, the data subject shall have the right to have their data transmitted directly from one controller to another. This type of transmission applies where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert this right to data portability, the data subject may at any time contact the Data Protection Officer designated by Lowara Distribution Ireland or another employee.

### Right to object

Each data subject has the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to the processing of personal data concerning him or her. This right is based on point (e) or (f) of Article 6(1) of the GDPR. This right also applies to profiling based on these provisions.

Lowara Distribution Ireland shall no longer process the subject's personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Lowara Distribution Ireland processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This rule applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Lowara Distribution Ireland to the processing for direct marketing purposes, Lowara Distribution Ireland will no longer process the personal data for these purposes.

The data subject also has the right, on grounds relating to his or her situation, to object to the processing of personal data concerning him or her by Lowara Distribution Ireland for any scientific or historical research purposes. As well as for statistical purposes as outlined in Article 89(1) of the GDPR, unless the processing is

necessary for the performance of a task carried out for reasons of public interest. To exercise the right to object, the data subject may directly contact the Data Protection Officer of Lowara Distribution Ireland or another employee. Also, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

### Right not to be subject to automated decision-making, including profiling

Each data subject has the right granted by the European legislator not to be subject to a decision based solely on automated processing. This right is inclusive of profiling, which produces legal effects concerning the data subject, or similarly significantly affects said data subject as long as the decision:

- Is not necessary for entering into, or the performance of, any contract between the data subject and a data controller.
- Is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests.
- Is not based on the data subjects explicit consent.

If the decision is necessary for entering, or the performance of, a contract between the data subject and a data controller, or is based on the data subject's explicit consent, Lowara Distribution Ireland will implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests. This is inclusive of the right to obtain human intervention on the part of the controller or if necessary to express their point of view and to contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, they can directly contact our Data Protection Officer of Lowara Distribution Ireland or another employee of the controller at any time.

### Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to

withdraw his or her consent to the processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, they may directly contact our Data Protection Officer of Lowara Distribution Ireland or another employee of the controller at any time.

## 7. Is providing personal data mandatory?

Most of our services do not require any form of registration, allowing you to visit our site without you telling us who you are. However, some services may require you to provide personal data. In such situations, if you choose to withhold any personal data which is requested by us, it may not be possible for us to contact you in response to your query or provide information which you wish to request.

On the website of Lowara Distribution Ireland users can subscribe to our enterprise's newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter gets ordered from the controller.

A confirmation e-mail is sent to the e-mail address registered by a data subject in the double opt-in procedure. This confirmation e-mail is used to confirm the owner of the e-mail address as the data subject and is authorised to receive the newsletter.

During the registration process for the newsletter, we also store the IP address of the computer system as assigned by the internet service provider (ISP) and used by the data subject at the time of the registration, along with the date and time of the registration. The collection of this data is necessary to discern the (possible) mistreatment of the e-mail address of a data subject at a later stage. Therefore, it serves the aim of the legal protection of the controller.

For retraction of consent, a corresponding link ('unsubscribe') is included in each newsletter sent, follow this link to instigate the process of removing consent. Furthermore, it is possible to unsubscribe from the newsletter at any time directly on the website of the controller, or if preferable, you can communicate this requirement to the controller in a different way which is personally more suitable.

## 8. Transferring and storing your data

The data which we collect from you may at times be transferred to, and stored at, a destination internationally or outside the European Economic Area ("EEA"). This data may also require processing by staff operating outside the EEA who work for one of our suppliers or us. Such staff maybe engaged in the fulfilment of your order, the processing of your payment details and the provision of support services among other things. By submitting your data, you agree to this transfer, storing or processing. We take all steps reasonably necessary to ensure that your data is kept secure as outlined in this privacy policy.

All information provided to us by a given data subject is then stored on our secure servers. All payment transactions are encrypted using SSL technology. Where we have given the data subject (or where they have chosen) a password which enables access to certain parts of our site, the data subject has the responsibility of keeping this password confidential. It is essential that you not to share a password with anyone for security reasons.

Unfortunately, the transmission of information via the internet is not entirely secure. We will do our best to protect your personal data. However, we cannot guarantee the security of your data transmitted to our site. Any transmission of data is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

## 9. Legal basis for processing data

During a user's registration, or later on the platform, they may provide information such as name, company name, email address, telephone, credit card number, and other relevant data. This information is used to identify the user and to provide them with support services, mailings, sales and marketing actions, billing and to meet any contractual obligations.

Such as in a situation where the processing of personal data is essential for a contract to be executed in which the data subject is a party, for example, when processing operations are required for the supply of goods or to provide any other service.

The same applies to processing operations essential for carrying out any pre-contractual measures. An example of such an instance is when a data subject is

making queries and enquiries about our services and products. Or, in cases where our company is subject to a legal obligation in which the processing of personal data is required (an example would be the fulfilment of tax obligations).

Processing shall be lawful only if and to the extent that at least one of the following applies:

- The data subject has given consent to the processing of their data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject before entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the controller is subject.
- Processing is needed to protect the vital interests of the data subject or another natural person.
- Processing is required for the performance of a task carried out in the public interest or the exercise of official authority vested in the controller.
- Processing is necessary for the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

## 10. The period for which your personal data is stored

The criteria used to determine the period of storage of personal information is the respective statutory retention period. After the expiration of that period, the corresponding data is deleted routinely, as long as it is no longer necessary for the fulfilment of the contract or the initiation of the said contract.

If you wish to request that we cease to use your registration information to provide you services contact us at [privacy@ldireland.ie](mailto:privacy@ldireland.ie). We will retain and use your registration information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



## 11. Disclosure of your information to third parties

Lowara Distribution Ireland is a member of the Tricel Group (referred to hereafter as “the Group”). When a Prospect or Customer provides personal data to Lowara Distribution Ireland, the company may process this personal data, including sharing it with other companies within the Group and any other relevant third parties. Third party may include server and hosting providers, payment processors, credit platforms, customer service and management tools.

Up-to-date list of our sub processors is available on request from [privacy@ldireland.ie](mailto:privacy@ldireland.ie).

This will only be done in compliance with the General Data Protection Regulation (GDPR) for the following purposes (hereafter referred to as “the Purposes”):

- To provide the Customer with information about products or services that may be of interest.
- To enable or assist Lowara Distribution Ireland in fulfilling its obligations in relation to any contracts for the supply of goods and/or services to the Customer.
- To enable Lowara Distribution Ireland to inform the Customer about changes to Lowara Distribution Ireland’s services and/or terms and conditions.
- To assist or enable Lowara Distribution Ireland in the delivery of goods to the Customer.
- To assist Lowara Distribution Ireland in its administrative tasks, risk assessments, and credit checking processes, which includes conducting credit checks on the customer.

To view a list of the Companies within the Tricel Group, please visit

<https://tricel.eu/tricel-group-organisation/>

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media sites) or join communities on such sites, we may provide links or embed third-party applications that allow you to log-in, post content or join communities from our websites.

We may also provide you with general links to non- Lowara Distribution websites. Your use of these links and applications is subject to the third parties' privacy policies, and you should become familiar with the third-party sites' privacy policies before using the links or applications.

Lowara Distribution is not responsible for the privacy practices or the content of those other websites.

Your data may be processed by third parties, including Habla inc (Olark), Active Demand, Hubspot, Google Analytics, Google AdWords and specific components of social media applications (such as Facebook, LinkedIn, Twitter) integrated with our websites

We may also disclose your personal information to third parties:

- If we buy any assets, in which case we may disclose your data to the prospective buyer or seller of such business or assets.
- If Lowara Distribution Ireland or substantially all of its assets are acquired by a third party, in which case data held by it about its customers are one of the transferred assets.
- If we are required under a duty to disclose or share your data to comply with any legal obligation. Alternatively, to enforce or apply our terms of use or terms and conditions of supply and other such agreements. Alternatively, to protect the rights, property, or safety of Lowara Distribution Ireland our customers, or others. This disclosure also includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

## 12.Recruitment

In connection with a job application or inquiry, whether advertised on Lowara Distribution Ireland website or otherwise, you may provide us with information about yourself, such as a resume. We may use this information throughout Lowara Distribution Ireland and or the Tricel Group to address your inquiry or consider you for employment purposes. Unless you tell us not to do so, we may keep the information for future consideration.

### 13. Monitoring or recording of calls, chats and other interactions

Certain online transactions may involve you calling us or us calling you. They may also involve online chats. Please be aware that it is Lowara Distribution Ireland's general practice to monitor and, in some cases, record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.

### 14. Your consent

You do not have to consent to our marketing material to buy our products or services; your consent is given freely and unambiguously by you.

- We do not use pre-ticked boxes or any other form of permission by default.
- It is explained in this Privacy Policy why and how we may use your data.
- You can withdraw your consent at any time by clicking on the unsubscribe link on any of our marketing emails.
- We keep a record of when your consent was given and withdrawn.
- If you chose not to give consent for the use of your data, it would not be a detriment in either the use of our website or the services we provide. Consent is not a pre-condition of our service.