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1.0 Purpose

Introduction and data controllers

At Peerless Pump, we value your privacy, and we take data protection seriously. As a company operating both in the United States and internationally, we are committed to complying with all applicable U.S. privacy laws, including the California Consumer Privacy Act (CCPA), as well as other state and federal regulations governing personal data, as well as with the General Data Protection Regulation (“GDPR”, Regulation (EU) 2016/679) and with other applicable data protection laws in the countries that we operate in. This privacy policy describes what personal data we collect from you, how we collect it, why we collect it, how we may use and share it, and what your rights are as a data subject.

To make it easy for you to read and understand our policy, we have made separate headings for the typical interactions that you may have with Peerless Pump. You may fall within more than one category, e.g. if you are both a customer and a recipient of marketing materials, in which case the description in each category will apply to you.

This privacy policy does not cover personal data in relation to employees of Peerless Pump, job applicants using our recruitment portal, or other contexts which are subject to separate privacy policies. In most cases, Peerless Pump Company, 2005 Dr. Martin Luther King Jr. Street, P.O. Box 7026, 46202 Indianapolis, IN, USA, is the data controller responsible for your personal data. For information concerning the data controller(s) of cookies/pixels on our websites, and similar technologies used for analytics, advertising, lead generation, conversion measurement, and related purposes, please refer to our [cookie policy](#).

Our contact information is set out at the end of this privacy policy.

Your personal data may also be subject to local data protection laws. We take great care to ensure compliance with local requirements, and additional policies may apply locally, in which case they will be available on our website.

2.0 Scope

Any interaction with Peerless Pump through:

- Peerless Pump websites
- Peerless Pump marketing materials
- Purchase of Peerless Pump products
- Usage of Peerless Pump digital offerings
- Sale to Peerless Pump of material, components or goods used by Peerless Pump

3.0 Responsibilities

It is the responsibility of all Peerless Pump employees to properly handle sensitive data as per this policy.

4.0 General Requirements

Website visitors

If you visit our websites, we collect personal data from you.

The personal data collected includes, among others:

- **Details about how you arrived at our websites**, e.g. if you clicked on a banner, arrived from a social media platform, advertising campaign, search engine, or other third-party source.
- **Location details**, such as your current location, country, local website preferences etc.
- **Usage and interaction information**, such as your IP address (hashed), details about your interactions with our websites (including product searches, page visits, time spent on pages, clicks performed, written input, etc.), performance and diagnostics data and statistics, your device's operating system and other specifications, browser-related information, cookies or similar identifiers, and information relating to advertising interactions, campaign attribution, conversion events, etc.
- **Customer support-related information**, such as details entered in self-service or contact forms, logs of chat sessions with our customer support personnel, etc. This may include information submitted through embedded website forms, request forms, lead capture forms, and similar digital form tools.
- **Survey and customer satisfaction data**, such as responses to surveys, feedback provided to Peerless Pump or Peerless Pump employees, etc.

For website visitors we collect personal data through interactions with the websites, e.g. through use of cookies or pixels (please refer to our [cookie policy](#) for further details). Finally, we may collect or receive personal data from third parties, such as social media platforms, websites, and business partners of Peerless Pump, or from publicly available sources, including analytics providers, advertising partners, customer relationship management providers, lead-generation and business intelligence providers, survey providers, form providers, and payment service providers where relevant to the website interaction.

We may use third-party lead identification and marketing support services to obtain personal and non-personal information about you based on your interaction with our websites. This collection may be triggered when you access page(s) on our websites where a pixel or similar technology is present. Depending on the service used, the information collected may include information about your web browser, IP address, pages visited, and cookies stored in your browser. We may use the data collected through such services to obtain additional information about you and to support marketing and business development activities. For more information about the relevant provider's data use, collection practices, and available opt-out rights, please refer to that provider's privacy notice.

In connection with peerlesspump.com and related digital communications, we may use third-party tools and services such as Meta, LinkedIn, Salesforce, Google Ads, Google Analytics, Google Tag Manager, ZoomInfo, Qualtrics, Gravity Forms, Bullseye, and Stripe and other similar tools and services. These tools may support website analytics, advertising, remarketing, conversion measurement, lead capture, customer relationship management, business intelligence, surveys, web forms, and payment processing. The specific tools we use may change from time to time as our website and business needs develop.

Furthermore, we may use LeadPost Services to obtain personal and non-personal information about You. This collection is triggered when you access our Website through a pixel placed on our Website. LeadPost Service may collect the following information when you interact with the page(s) on our Website where the pixel is present: (i) information about your web browser; (ii) your IP address, (iii) web pages visited; and (iv) cookies stored in your browser. We may use the data collected by LeadPost to obtain personal information about You and use this data for marketing to You. For more information about LeadPost's data use and collection policies and practices and your opt out rights, please review the LeadPost Privacy Policy located at <https://leadpost.com/privacy-policy>.

We use personal data to improve our services and to learn more about the behaviour of our visitors. We do this through analyses and statistics based on the data that we collect. Further, we use your personal data for internal purposes at Peerless. The main purposes include:

- Improvement and development of Peerless Pump offerings, including for statistical purposes, and analyses of user requirements;
- customer success management, i.e. monitoring, analysis, management, and support of full lifecycle customer relationships;
- optimization of our marketing services based on knowledge of user behaviors and usage, including campaign measurement, advertising effectiveness, remarketing, lead generation, and conversion tracking;
- administration of website forms, surveys, and other data collection tools made available through our websites; processing and administration of online payments and related transaction records where payment functionality is made available through our websites;
- training of Peerless Pump employees, e.g. in customer support, IT development, or sales;
- optimization and development of support services;
- bug fixing and technical maintenance;
- compliance with the legal obligations of Peerless Pump; and
- solving disputes, enforcing contractual agreements, and establishing, exercising or defending legal claims.

To do the above, we combine and enrich the data that we have collected or received, and we use profiling and automated decision-making. Please refer to “Profiling and automated decision-making” below. As examples, this entails that your product searches or use of certain features can be combined with data from our marketing systems (if you are a marketing recipient, see “Marketing recipients”) or with data concerning your Peerless Pump account (if you are a registered user, see “Users of Peerless Pump digital offerings”), which will allow us to personalize content for you, or that data is enriched with data from third parties or AI/machine learning, including for analytics, lead identification, customer relationship management, sales intelligence, lead scoring, advertising measurement, and marketing purposes.

Marketing recipients

When you are a marketing recipient, we collect personal data which we use to provide you with tailored news, information, events, and offers, thereby improving your Peerless Pump experience.

The personal data collected includes, among others:

- **Personal details**, such as your name and surname, signature, language preferences, etc.
- **Contact details**, such as your (work) address, country of residence/geographic region, telephone number, email address, etc.
- **Work-related information**, such as your industry, role, employer, relationship with other parties (e.g. distributors or installers), areas of interest, etc.
- **Information about interactions with you**, such as your consent to receipt of marketing materials, effectiveness of marketing efforts (such as your clicks, opens, channels, etc.), marketing preferences, product searches and interests, information about sales visits, event or trade fair participation, etc. This may also include interactions with our advertisements, forms, landing pages, surveys, and related digital campaigns on our websites or third-party platforms.
- **Details concerning participation in loyalty/reward programs and competitions**, such as details about amount of points collected and how, spending of points, rewards and prizes won, amount of lots or tickets in draws, quiz answers, participation in games, etc.
- **Activity on relevant third-party platforms**, such as social media activity (in accordance with your consents/settings on such social media) and platforms of our business partners.
- **Survey and customer satisfaction data**, such as responses to surveys (unless anonymous), feedback provided to Peerless Pump or Peerless Pump employees, etc.

We use your personal data to provide you with the direct marketing materials, and we use your personal data to ensure that the marketing materials are personalized to your interests and specific circumstances as

further set out above. As the main rule, we collect your personal data directly from you, e.g. when you provide us with your contact details and sign up for marketing materials. We may also collect personal data from you or your employer in your role of customer (see “Customers”), or from Peerless Pump offerings (e.g. products, apps or cloud services) and Peerless Pump websites used by you (see “Users of Peerless Pump digital offerings” and “Website visitors”). Finally, we may collect or receive personal data from third parties, such as social media platforms, websites, and business partners of Peerless Pump, or from publicly available sources, including customer relationship management providers, lead-generation providers, analytics providers, survey providers, business intelligence providers, and lead identification providers.

In addition to provision of marketing materials, and personalization of the marketing materials which you receive, we use your personal data for internal purposes at Peerless Pump, including:

- Customer success management, i.e. monitoring, analysis, management, and support of full lifecycle customer relationships;
- optimization of marketing services, e.g. analyzing customer demands to target advertising or providing you with information about supplementary services/products to your existing portfolio;
- optimization and development of support services;
- training of Peerless Pump employees, e.g. in customer support or sales;
- bug fixing and technical maintenance;
- compliance with the legal obligations of Peerless Pump, e.g. marketing laws and data protection laws; and
- solving disputes, enforcing contractual agreements, and establishing, exercising or defending legal claims.

To do the above, and for general support of customer relationships, we combine and enrich the data that we have collected or received, and we use profiling and automated decision-making. Please refer to “Profiling and automated decision-making” below. As examples, this entails that data stored in our customer relationship management-system (CRM) is combined with data from our marketing systems (see “Customers”), or that we can combine marketing data with product and offering usage data (see “Users of Peerless Pump digital offerings”), or that data is enriched with data from third parties or AI/machine learning. We may also combine data to ensure compliance with legal obligations of Peerless Pump and to support campaign measurement, lead management, business development, and marketing activities.

Customers

When you are a customer of Peerless Pump, or when you work for a company which is a customer of Peerless Pump, we collect personal data which we use to provide you or your employer with the best possible Peerless Pump experience, thereby improving customer value.

The personal data collected includes, among others:

- **Personal details**, such as your name and surname, signature, language preferences, video/audio recordings and photos of you (in case of remote support), etc.
- **Contact details**, such as your (work) address, country of residence/geographic region, telephone number, email address, etc. Work-related information, such as your industry, role, employer, relationship with other parties (e.g. distributors or installers), areas of interest, etc.
- **Sales-related information**, to the extent that this contains personal data, such as email correspondence, information about sales visits, event or trade fair participation, webinar participation, pending orders or active subscriptions, purchase/order history, subscription history, quotation history, delivery addresses, rebates and incentives, etc.
- **Product, warranty and service-related information**, to the extent that this contains personal data, such as installed base, installation dates, warranty status, extended warranties, repair and service information including maintenance status and service visits, etc.
- **Product usage and product status information**, to the extent that this contains personal data and that it may be linked with you as a customer, such as water flow and pressure, water and waste water discharge, power usage, temperature, other utilization data, error reports, maintenance status, pending service visits, usage logs, etc.

- **App, offering or website usage**, to the extent that this may be linked with you as a customer, such as your interactions with functions within the various apps or services (including feature usage, product searches, page visits, time spent on pages, clicks or touches performed, written input, usage history, etc.), product connectivity, data concerning activity levels (inactivity) within the context of the offering, event logs, reports created or shared, details of downloaded/installed apps or programs, your IP address, performance and diagnostics data and statistics, version data, your device's type, operating system and other specifications, crash data, network carrier, etc.
- **Customer support-related information**, such as details entered in self-service or contact forms, logs of chat sessions with our customer support personnel, caller ID, audio recording of calls (may be subject to consent, depending on the circumstances) or call notes, time of calls, correspondence with Peerless Pump, etc.
- **Details concerning participation in loyalty/reward programs and competitions**, such as details about amount of points collected and how, spending of points, rewards and prizes won, amount of lots or tickets in draws, quiz answers, participation in games, etc.
- **Details concerning participation in network or communities hosted or facilitated by Peerless Pump**, such as details of your interactions with Peerless Pump or other participants in such contexts and data necessary for facilitation of the network/community in question.
- **Transaction and/or financial information**, to the extent that this contains personal data, such as invoicing details, bank details, credit or debit card information, information from credit agencies, etc. Where online payment functionality is offered through our websites or digital tools, payment-related personal data may be processed by payment service providers on our behalf or independently in accordance with their own privacy notices, as applicable.
- **Details concerning visits at Peerless Pump or elsewhere**, to the extent that we host a visit by you or otherwise facilitate visits and travel by you in a Peerless Pump context, such as your reason for visit, and if relevant dietary requirements, accommodation, travel itinerary, passport copy (if required), home address (if required), emergency contacts, photos and group photos, etc.
- **Activity on relevant third-party platforms**, such as social media activity (in accordance with your consents/settings on such social media) and platforms of our business partners.
- **Survey and customer satisfaction data**, such as responses to surveys, feedback provided to Peerless Pump or Peerless Pump employees, etc.

The above-mentioned personal data will only be collected to the extent relevant for your customer relationship and your interactions with Peerless Pump. As the main rule, we collect your personal data directly from you or your employer/co-workers, e.g. when you provide us with your contact details or you purchase a product/service from us. We may also collect personal data from Peerless Pump offerings (e.g. products, apps or cloud services) and Peerless Pump websites used by you (see "Users of Peerless Pump digital offerings" and "Website visitors" for additional details), or from your receipt of our marketing materials (see "Marketing recipients"). Finally, we may collect or receive personal data from third parties, such as social media platforms, websites, and business partners of Peerless Pump, or from publicly available sources, including analytics providers, customer relationship management providers, lead-generation providers, survey providers, payment service providers, and lead identification providers where relevant..

We use the personal data e.g. for tailored offers, improved service and support for your Peerless Pump products, and increased functionality of Peerless Pump offerings. In other words, we use and analyze personal data to ensure a personalized customer experience for you, based on your preferences and your interactions with Peerless Pump, and to continuously improve Peerless Pump offerings. Further, we use your personal data for internal purposes at Peerless Pump, including:

- Customer success management, i.e. monitoring, analysis, management, and support of full lifecycle customer relationships;
- optimization of marketing and sales activities, e.g. analyzing customer demands to target advertising or providing you with information about supplementary services/products to your existing portfolio;
- optimization and development of support services;
- communication purposes, e.g. customer interviews or stories;
- training of Peerless Pump employees, e.g. in customer support or sales;

- bug fixing and technical maintenance; planning, performing and managing the contractual relationship with customers, including administration and bookkeeping;
- fraud and abuse prevention; compliance with the legal obligations of Peerless Pump, e.g. export control and customs or sanctions screenings; and
- solving disputes, enforcing contractual agreements, and establishing, exercising or defending legal claims.

To do the above, and for general support of customer relationships, we combine and enrich the data that we have collected or received, and we use profiling and automated decision-making. Please refer to “Profiling and automated decision-making” below. As examples, this entails that data stored in our customer relationship management-system (CRM) is combined with data from our marketing systems, or that we can combine sales data with product usage data, or that data is enriched with data from third parties or AI/machine learning.

We may also combine data to ensure compliance with legal obligations of Peerless Pump, e.g. for sanctions screenings.

Users of Peerless Pump digital offerings

If you are the owner or user of a Peerless Pump digital offering or app, including physical products with smart functionality, or if you are a registered user with Peerless Pump (creating a Peerless Pump account), we may collect personal data from you. Please note that not all data related to products and services/apps will be “personal data” under the GDPR. Personal data will only be data that can be related to you as a data subject.

The personal data collected includes, among others:

- **Personal details**, such as your name and surname, user ID/login and password, language preferences, video/audio recordings and photos of you (in case of remote support), etc.
- **Contact details**, such as your (work) address, country of residence/geographic region, telephone number, email address, etc.
- **Work-related information**, such as your employer/company, areas of interest, job role, etc.
- **Sales-related information**, to the extent that this contains personal data and that it may be linked with you as a user, such as pending orders or active subscriptions, purchase/order history, subscription history, delivery addresses, rebates and incentives, etc.
- **Product, warranty and service-related information**, such as installed base (products and serial no., installation address), installation dates, warranty status, extended warranties, repair and service information including maintenance status and service visits, etc.
- **Product usage and product status information**, to the extent that this contains personal data, such as water flow and pressure, water and waste water discharge, power usage, temperature, other utilization data, error reports, maintenance status, pending service visits, usage logs, etc.
- **App or offering usage**, such as your interactions with functions within the various apps or services (including feature usage, product searches, page visits, time spent on pages, clicks or touches performed, written input, etc.), product connectivity, data concerning activity levels (inactivity) within the context of the offering, event logs, reports created or shared, details of downloaded/installed apps or programs, your IP address, performance and diagnostics data and statistics, your device’s type, operating system and other specifications, version data, crash data, network carrier, etc.
- **Activity on third-party platforms**, such as social media activity (in accordance with your consents/settings on such social media) and platforms of our business partners (in relation to specific offerings).
- **Location data**, such as user location.
- **Customer support-related information**, such as details entered in self-service or contact forms, logs of chat sessions with our customer support personnel, caller ID, audio recording of calls (if agreed to by you), etc.
- **Survey and customer satisfaction data**, such as responses to surveys, feedback provided to Peerless Pump or Peerless Pump employees, etc.

The above-mentioned personal data will only be collected to the extent relevant for your use of our offerings and your other interactions with Peerless Pump. We collect the personal data both directly from you and through your use of our offerings (including physical products, apps, cloud services, etc.). As an example of personal data collected directly from you, when you create a Peerless Pump account you provide us with your contact details, user ID/login, and employer information, and you may also provide us with additional (optional) details such as areas of interest. Some personal data will only be collected if you choose to utilize specific functions, such as alarms or reports, or if you link your app/product with a Peerless Pump account (where linking is optional). Finally, we may collect or receive personal data from third parties, such as business partners of Peerless Pump or water supply/treatment organizations, or from publicly available sources.

We use this personal data to provide you with additional value and personalization, e.g. functionalities which could optimize your water usage, energy efficiency, maintenance of products, set up alarms for you, deliver reports to you, etc. In short, we want to provide you with valuable solutions, and we want to improve those solutions and the customer experience continuously. If you create a Peerless Pump account, we collect personal data from you which we use to provide you with offerings which require a Peerless Pump account (see also “Customers” and “Marketing recipients”), to provide you with personalized content and suggestions based on your preferences and your interactions with Peerless Pump, and to continuously improve Peerless Pump offerings and user experience.

Further, we use your personal data for internal purposes at Peerless Pump. The main purposes include:

- Customer success management, i.e. monitoring, analysis, management and support of full lifecycle customer relationships;
- optimization of marketing and sales activities based on knowledge of user behaviors and offering usage;
- optimization and development of support services;
- communication purposes, e.g. user interviews or stories;
- training of Peerless Pump employees, e.g. in customer support, technical support, or sales;
- bug fixing and technical maintenance; planning, performing and managing the contractual relationship with users, including administration and bookkeeping;
- compliance with the legal obligations of Peerless Pump, e.g. product compliance laws or data protection laws; and
- solving disputes, enforcing contractual agreements, and establishing, exercising or defending legal claims.

To do the above, we combine and enrich the data that we have collected or received, and we use profiling and automated decision-making. Please refer to “Profiling and automated decision-making” below. As examples, this entails that we combine data from different products and apps, or that we can combine sales data with product usage data (see “Customers” and “Marketing recipients”), or that data is enriched with data from third parties or AI/machine learning.

Suppliers

If you or your employer is a supplier of Peerless Pump, or a subcontractor to a supplier of Peerless Pump, we may collect personal data from you to ensure that our business relationship runs efficiently and smoothly.

The personal data collected includes, among others:

- **Personal details**, such as your name and surname, username/login and password (if applicable), signature, language preferences, etc.
- **Contact details**, such as your (work) address, country of residence/geographic region, telephone number, email address, etc.
- **Work-related information**, such as your industry, role, employer, relationship with other parties, work permit status, educational background and courses/certifications completed (if relevant), etc.
- **Supplier-related information**, to the extent that this contains personal data, such as email

correspondence, supplier history with Peerless Pump, references, performance reviews, event or trade fair participation, etc.

- **Transaction and/or financial information**, to the extent that this contains personal data, such as invoicing details, bank details, information from credit agencies, etc.
- **Details concerning visits or work at PEERLESS PUMP or elsewhere**, to the extent that we host a visit by you or otherwise facilitate visits and travel by you in a Peerless Pump context, or if you perform work at Peerless Pump locations or on behalf of Peerless Pump at other locations, such as your reason for visit (including job task details), and if relevant dietary requirements, accommodation, travel itinerary, passport copy (if required), home address (if required), emergency contacts, photos and group photos, etc.
- **Supplier survey data**, such as responses to surveys, feedback provided to Peerless Pump or Peerless Pump employees, etc.

The above-mentioned personal data will only be collected to the extent relevant for your supplier relationship and your interactions with Peerless Pump. As the main rule, we collect your personal data directly from you or your employer/co-workers, e.g. when you provide us with your contact details or we enter into a business relationship with you. We may also collect personal data from your use of our websites (see “Website visitors”, and, if you have a Peerless Pump account, also “Users of Peerless Pump digital offerings”). Finally, we may collect or receive personal data from third parties, such as business partners of Peerless Pump, or from publicly available sources.

We use the personal data for day-to-day cooperation, planning, administration, handling of invoices, etc. We also use your personal data to ensure compliance with the legal obligations of Peerless Pump, e.g. in respect of sanctions or anti-money laundering/anti-corruption initiatives or adherence to Peerless Pump policies, to prevent fraud and abuse, to manage and enforce contractual obligations, and/or to establish, exercise or defend legal claims. We may combine data to ensure compliance with legal obligations of Peerless Pump, e.g. for sanctions screenings, or to ensure compliance with our supplier code of conduct.

Legal bases for the processing of personal data by Peerless Pump

In accordance with data protection laws, we apply different legal bases when we collect and process personal data, depending on the specific context:

- In some cases, we ask for your consent (GDPR Article 6(1)(a)), e.g. your consent to receive direct marketing materials from us (but please note that in accordance with local laws, some jurisdictions may be based on opt-out instead of opt-in) or your consent to cookies on our websites and similar tracking technologies used for analytics, advertising, lead generation, or related purposes where required by applicable law. You have the right to withdraw your consent at any time. A withdrawal of consent does not affect the lawfulness of our processing prior to the withdrawal or processing based on a different legal basis than consent.
- If you are a customer, digital offering user, supplier of, or registered user with Peerless Pump, our use of personal data will often be required to perform a contract with you (which includes our Terms of Use and/or any contract entered into with your employer) or provide a service for you (GDPR Article 6(1)(b)). This is e.g. the case when we enable you to use smart functionalities of a pump, if you have access to an app or cloud service, when we process customer and supplier information in our IT systems to ensure that contractual obligations are managed, or when we. If you fail to provide the personal data in question, we may not be able to provide you with the specific service (e.g. access to an app/website or use of a smart functionality).
- We are subject to a number of legal obligations, including bookkeeping/record keeping obligations, tax and customs-related obligations, sanctions and export control-related obligations, etc. For this reason, we process your personal data to ensure our compliance with such obligations (GDPR Article 6(1)(c)).
- Finally, in some contexts we process your personal data based on the legitimate interests of Peerless Pump (GDPR Article 6(1)(f)). This is e.g. the case when we utilize data from our offerings (products, services, and digital solutions such as apps, cloud services, and websites) to analyses usage and customer behavior/interactions, which we then use to create value for both our customers/users and Peerless Pump by improving our offerings (added features, performance

optimization, personalized user experience, technical maintenance, etc.). We also rely on our legitimate interests when we utilize data for personalizing our marketing, sales and other customer initiatives through profiling, choice of marketing/sales channels, etc. It is e.g. also the case when we invite you to participate in a survey, or when we seek to establish, exercise or defend legal claims. The internal purposes listed above under each category are based on our legitimate interests, unless specifically based on contract or legal obligation. These legitimate interests are deemed not to be overridden by the interests or fundamental rights and freedoms of you as a data subject – in this regard we emphasize that our pursuit of legitimate interests is also to the benefit of you as a customer, user, marketing recipient, supplier, and website visitor. If you want to know more about how your personal data is being processed for our legitimate interests, please reach out to us using the below contact details.

We will only process your personal data for a different purpose than that for which the personal data was originally collected if this is necessary to comply with legal or regulatory obligations (e.g. transfer to courts or criminal prosecution authorities), if you have consented to the respective processing, or if the processing is otherwise lawful.

How we share and transfer your personal data

We share your personal data only when needed to realize the purposes described above. The main categories of recipients are:

- Other companies within the Peerless Pump Group.
- Business partners of Peerless Pump, e.g. suppliers, sales and marketing partners (including social media platforms), advertising partners, analytics providers, customer relationship management providers, lead-generation, lead identification and business intelligence providers, survey providers, form providers, and payment service providers where relevant), partners for digital offerings and IoT, logistics partners, event organizers, customers of Peerless Pump in respect of specific offerings (e.g. water utilities, water treatment facilities or district heating providers), etc.
- IT service providers and data processors on behalf of Peerless Pump, e.g. hosting services, IT support, cloud services, user administration services, etc. This may include providers supporting website hosting, analytics implementation, digital forms, surveys, customer relationship management, marketing automation, lead identification, and payment processing.
- Other recipients supporting Peerless Pump business operations, e.g. consultants and advisers of Peerless Pump, sanctions-screening partners, etc.
- Other authorized third parties who may need to access or store personal data if required or permitted by applicable law (e.g. governmental authorities or other competent public bodies, courts, arbitral tribunals, attorneys, etc.).

Depending on the circumstances and the role of the third party, recipients described above may process personal data as processors acting on our behalf or, where applicable, as separate controllers in accordance with their own privacy notices and applicable law.

We do not sell your personal data or share it with irrelevant third parties.

In certain cases, your personal data may be transferred to countries outside of the EU/EEA. Peerless Pump ensures that such transfer will be carried out in accordance with the applicable data protection laws. This entails that any party outside of the EU/EEA (and countries subject to an EU adequacy decision) which comes in possession of your personal data must ensure an adequate level of protection, for example by entering into the EU standard contractual clauses.

If you are located outside the EU/EEA, your personal data may be transferred to countries within the EU/EEA or otherwise outside your country of residence. We take great care to ensure compliance with local requirements when transferring data across borders.

Profiling and automated decision-making

We use profiling (automated analyses or predictions based on a profile of you or similar categories of

individuals) and automated decision-making to provide you with value-adding content and interactions. As an example, this could be personalized offers, adverts and other marketing materials which we believe will be of greater value to you than generic marketing materials. It could also be to determine what, when, and how we should interact with you to optimize your customer or user experience, e.g. when to reach out to you with relevant materials, personalizing your homepage, etc. As set out above, this entails that we may use data contained in e.g. our customer relationship management (CRM) system together with details about purchase history, product app, or other offering usage, service history, searches on our website, social media activity, etc., to achieve a more complete picture of your behaviors and demands as a customer or user.

To the extent possible, we will anonymize and aggregate data when performing our analyses and compiling statistics.

You have the right to object to the processing of your personal data for direct marketing purposes, including profiling related to such direct marketing, and you may also have the right to object in other circumstances. To the extent that you are subject to a decision based solely on automated processing which produces legal effects concerning you or which similarly significantly affects you, you have the right to obtain human intervention. Please refer to “Your rights” below.

Retention of personal data

Personal data collected for the purposes stated above will be stored only for as long as necessary for the relevant purpose. As examples:

- When signing up for a Peerless Pump account, you will receive an account validation email. Furthermore, if you have not been active for three years (36 months), your Peerless Pump account including your personal data will be deleted.
- If you are a customer or supplier, or if your employer is, we will keep your contact details for as long as we have an active relationship with you. When the relationship is no longer active, the personal data will be kept for an additional period to ensure that we are able to re-establish the relationship if necessary, or for as long as required under applicable law and as long as necessary to ensure proper performance of any remaining contractual obligations.
- If you have previously been a user of our digital offerings, we may retain your personal data for a reasonable period of time following deactivation to facilitate onboarding and quality of usability of the digital offerings if you choose to return to the digital offering at a later point in time. We will set the retention period based on what we believe to be a realistic time period for returning users.
- Financial, transactional, tax/customs, and compliance-related personal data (such as invoicing details, payments received or made, results of sanctions screenings, etc.) will be kept for as long as required under applicable law or for as long as necessary to ensure proper performance of contractual obligations.
- Calls to our customer support function and caller ID will be stored for two years since the calling date.

If a judicial or disciplinary action is initiated or contemplated, the personal data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived.

When personal data is deleted, the data (including behavior information) may be kept in an anonymized form that does not allow you to be identified.

Your rights

You always have the following right:

Withdrawal of consent: If you have declared your consent for any personal data processing activities, you may withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent or processing based on a different legal basis than consent.

Depending on your location and subject to applicable laws, including the GDPR, you may also benefit from the below rights:

Right of access: You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the personal data has been or will be disclosed.

However, this is not an absolute right and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of the personal data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

Right to rectification: You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement. **Right to erasure ("right to be forgotten"):** Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

Right to restriction of processing: Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

Right to object: Under certain circumstances, you may have the right to object on grounds relating to your particular situation, or – where personal data is processed for direct marketing purposes – to object at any time to the processing of your personal data by us, in which case we can be required to no longer process your personal data.

Right to data portability: Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format, and you may have the right to transmit those data to another entity without hindrance from us.

Right to lodge a complaint: If you are of the opinion that the processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the EU or EEA member state in which you reside, work, or where the alleged infringement has taken place. A right to lodge a complaint with your local supervisory authority may also apply outside the EU/EEA, depending on your location.

Data protection officers and contact information

If you have any questions to this privacy policy or our processing of your personal data, or if you would like to exercise any of your rights as set out above, you are welcome to write Peerless Pump Company, 2005 Dr. Martin Luther King Jr. Street, P.O. Box 7026, 46202 Indianapolis, IN, USA.

Changes to the privacy policy

We reserve the right to change or supplement this privacy policy at any time. To the extent the changes of the privacy policy are regarded as material and significant, you will be informed hereof, for example via email or on our website. The privacy policy in force at any given time will always be available on our website.

5.0 Definitions

None

6.0 Records

Refer to Doc and Data Control Master List for record storage, responsibility, and retention etc.

7.0 Changes from last revision

Ver.	Version Date	Changed By	Approved By	Description of Change
0	2-23-2022	Amy Mahoney; ISO Manager	Francesco Cesare Magri; PPU General Manager	Initial Release
1	8-16-2022	Amy Mahoney; ISO Manager	Tommy Due Hoy; PPU General Manager	Reviewed for accuracy. No changes. Changed document owner from Francesco Magri to Tommy Due Hoy.
2	6-30-2026	Amy Mahoney; ISO Manager	Tommy Due Hoy; PPU General Manager	Beth Sentany, Marketing, Communications & Commercial Excellence Director worked with Legal to review and update to reflect the marketing tools that are applicable today.
3	9-8-2026	Amy Mahoney; ISO Manager	Scott Paterson; PPU General Manager	Scott Patterson, new Peerless GM, reviewed and approved this policy. No content changed.

8.0 References

Doc #	Document Title
NA	