

Privacy Notice

Eden Renewable Innovations Limited

Last updated: 22nd July 2026

1. Who we are

Eden Renewable Innovations Limited is the controller of your personal information for the purposes of UK data protection law. This means we decide how and why your personal information is used.

We sell insulation products and related products through our THERMAFLEECE® brand and website.

Our company details are:

- **Company name:** Eden Renewable Innovations Limited
- **Company number:** 05852839
- **Registered office:** Clint Mill, Cornmarket, Penrith, United Kingdom, CA11 7HW
- **Main trading address:** Soulands Gate, Dacre, Penrith, Cumbria, CA11 0JF
- **VAT number:** 886590172

In this privacy notice, “**Eden**”, “**we**”, “**us**” and “**our**” refer to Eden Renewable Innovations Limited.

2. How to contact us

If you have any questions about this privacy notice or how we use your personal information, please contact us using the details below.

- **Thermafleece enquiries:** enquiries@thermafleece.com
- **Telephone:** 017684 86285
- **Post:** Eden Renewable Innovations Limited, Soulands Gate, Dacre, Penrith, Cumbria, CA11 0JF

We have not appointed a statutory Data Protection Officer. Responsibility for data protection within our business is managed by our senior management team. Please use the contact details above for data protection enquiries.

3. What this privacy notice covers

This privacy notice explains how we collect and use personal information when you:

- visit or use our website, thermafleece.com;
- buy products from us online or otherwise place an order with us;
- contact us with an enquiry, technical question, complaint or request;
- ask for product information, samples, quotations or support;
- subscribe to marketing communications or interact with our marketing;
- take part in surveys, reviews, feedback requests or promotions; or
- otherwise deal with us as a customer, prospective customer, website user or contact.

This privacy notice applies to consumers and to business contacts. Where you buy from us as a consumer, this notice should be read alongside our online terms and conditions of sale.

4. Personal information we collect

The personal information we collect depends on how you interact with us. It may include the following categories.

4.1. Identity and contact details

- name;
- billing address;
- delivery address;
- email address;
- telephone number;
- business name and job title, if you contact us on behalf of a business; and
- account or login details, if website account functionality is made available.

4.2. Order and transaction information

- products ordered;
- order number;
- basket and checkout information;
- payment status and transaction references;
- delivery method, courier or pallet delivery information;
- returns, refunds, replacements and complaint information;
- communications about your order; and
- information about access restrictions or delivery requirements, where you provide this to us.

4.3. Payment information

Payment-card details are handled by our payment service providers. We do not store full payment-card details. We may receive and retain information such as payment confirmation, payment status, transaction ID, payment method, refund status and fraud-prevention checks associated with your transaction.

4.4. Enquiry, support and complaint information

- details of your enquiry or complaint;
- photographs, documents, samples information or inspection details that you provide in connection with a product issue;
- technical or project information you choose to share with us when asking about our products;
- records of our communications with you; and
- notes kept in our customer service, complaint or non-conformance records.

4.5. Website and device information

- IP address;
- device type, browser type and operating system;
- pages viewed and links clicked;

- date and time of website visits;
- referring website or source;
- cookie identifiers and similar tracking information; and
- information about how you use our websites and online services.

4.6. Marketing and preferences information

- your marketing preferences;
- whether you have opted in or opted out of marketing;
- your interaction with marketing emails or website content;
- records of consent where consent is required; and
- preferences you tell us about, such as product interests.

4.7. Special category information

We do not usually need to collect special category information, such as information about health, ethnicity, religious beliefs or political opinions. Please do not provide this type of information unless it is necessary for a specific request. If you provide special category information to us, we will use it only where we have a lawful basis and a valid condition under UK data protection law.

5. How we collect personal information

We collect personal information in the following ways:

- **directly from you**, when you place an order, contact us, complete a form, subscribe to communications, make a complaint or otherwise provide information to us;
- **through our websites**, using cookies, analytics tools, website forms and similar technologies;
- **from payment providers**, when they confirm payment status and transaction information;
- **from delivery providers**, when they update us about delivery arrangements, delivery issues, proof of delivery, failed delivery, redelivery or collection;
- **from ecommerce, hosting and IT providers**, where they support our website, checkout, order processing and business systems;
- **from marketing and analytics providers**, where they support our marketing, website analytics or customer communications; and
- **from third parties acting on your behalf**, such as a person placing an order for you, a nominated recipient, installer, contractor, surveyor, building professional or carrier that you have arranged.

6. Why we use your personal information and our lawful bases

UK data protection law requires us to identify a lawful basis for using your personal information. The main lawful bases we rely on are:

- **contract**, where we need to use your information to enter into or perform a contract with you;
- **legal obligation**, where we need to use your information to comply with the law;
- **legitimate interests**, where we have a legitimate business reason to use your information and your rights do not override that reason; and

- **consent**, where the law requires consent or where we choose to rely on consent.

Purpose	Personal information used	Lawful basis
To process and manage your order	Identity, contact, order, payment status and delivery information	Contract
To take payment and process refunds	Identity, order, payment status and transaction information	Contract; legitimate interests in operating our business and preventing payment issues
To deliver products to you	Name, address, telephone number, email address, order details and delivery requirements	Contract
To communicate with you about your order, delivery, returns or cancellation rights	Identity, contact and order information	Contract; legal obligation where consumer law requires communications or records
To handle enquiries, technical questions and product support requests	Identity, contact, enquiry and project information you provide	Legitimate interests in responding to enquiries and supporting our products; contract where the enquiry relates to an order
To investigate product issues, complaints, damaged items or alleged faults	Identity, contact, order, complaint, photographs, inspection and sample information	Contract; legal obligation; legitimate interests in resolving complaints, checking product quality and defending legal claims
To manage returns, replacements, repairs, refunds or statutory remedies	Identity, contact, order, delivery, returns and payment status information	Contract; legal obligation
To maintain accounting, VAT, tax and business records	Identity, contact, order, payment and transaction information	Legal obligation; legitimate interests in maintaining proper business records
To keep our websites secure and functioning properly	Website, device, log and security information	Legitimate interests in website security, fraud prevention and service operation
To improve our products, websites, customer service and internal procedures	Order, enquiry, complaint, website and feedback information	Legitimate interests in improving our business and customer experience
To send service communications, such as	Identity, contact and order	Contract; legal obligation;

order updates, delivery messages and important product information	information	legitimate interests
To send direct marketing where permitted	Identity, contact, marketing preferences and interaction information	Consent where required; legitimate interests where the soft opt-in or business-to-business marketing rules apply
To manage marketing preferences and suppression lists	Contact details and opt-out records	Legal obligation; legitimate interests in ensuring we respect your choices
To use cookies and analytics	Website, device, cookie and analytics information	Consent for non-essential cookies; legitimate interests for strictly necessary cookies and basic website operation
To prevent fraud, misuse of our websites or unlawful activity	Identity, contact, order, payment status, website and security information	Legitimate interests; legal obligation where applicable
To establish, exercise or defend legal claims	Any relevant information connected with the dispute or claim	Legitimate interests; legal obligation

7. Our legitimate interests

Where we rely on legitimate interests, those interests include:

- selling and delivering our products;
- responding to customer enquiries and providing customer service;
- managing complaints, product issues and quality control;
- improving our products, websites and internal processes;
- keeping proper business records;
- protecting our business, customers, websites and systems from fraud, misuse and security threats;
- recovering debts and managing legal claims; and
- marketing our products in a lawful and proportionate way.

When we rely on legitimate interests, we consider whether our use of your information is necessary and whether your rights and interests override our interests.

8. Marketing

We may use your contact details to send you marketing about our products, services, updates, offers, guidance or related information where the law allows us to do so.

For individual consumers, we will usually only send email marketing if:

- you have consented to receive it; or

- you bought, or negotiated to buy, products from us and we are marketing similar products or services to you, you were given a clear chance to opt out when your details were collected, and you have not opted out. This is known as the soft opt-in.

For business contacts, we may send marketing to corporate email addresses where permitted by law, provided the marketing is relevant to your business role and you can opt out.

You can opt out of marketing at any time by:

- using the unsubscribe link in our marketing emails, where available;
- contacting us using the details in section 2; or
- updating your preferences where website functionality allows this.

If you opt out of marketing, we may still send you service communications, such as order confirmations, delivery updates, responses to enquiries, safety information or information we are legally required to provide.

9. Cookies and similar technologies

Our websites use cookies and similar technologies. Cookies are small files placed on your device when you use a website. Some cookies are necessary for the website to work properly. Others help us understand website use, improve our services, remember preferences, support ecommerce functionality or measure marketing performance.

9.1. Types of cookies we may use

- **Strictly necessary cookies:** required for core website functions, such as security, page navigation, basket, checkout and payment processes. These do not require consent.
- **Preference cookies:** used to remember choices you make, such as settings or preferences.
- **Analytics cookies:** used to understand how visitors use our websites, such as which pages are visited and how users move through the site.
- **Marketing cookies:** used to measure or support marketing activity, including advertising performance and remarketing where enabled.

We will ask for your consent before setting non-essential cookies, unless the law allows otherwise. You can withdraw or change cookie consent at any time using the cookie settings tool on the relevant website, where available, or by changing your browser settings.

Blocking some cookies may affect how our websites work, including basket or checkout functionality.

10. Who we share personal information with

We may share your personal information with the following recipients where necessary and lawful:

- **payment service providers**, to process payments and refunds;
- **couriers, pallet networks, carriers and delivery providers**, to deliver products, manage delivery issues and arrange returns or collections;
- **website, ecommerce and hosting providers**, to operate our websites and online checkout;

- **IT, software and support providers**, to maintain our business systems and data security;
- **email, marketing and analytics providers**, to manage communications, analytics and marketing where permitted;
- **professional advisers**, including solicitors, accountants, insurers and auditors;
- **regulators, public authorities, courts, law enforcement bodies or other authorities**, where required or permitted by law;
- **product testing, inspection or quality-control providers**, where needed to investigate a product issue or complaint; and
- **another organisation involved in a business sale, restructuring or transfer**, where this is necessary for that transaction and appropriate safeguards are in place.

We do not sell your personal information.

11. International transfers

We are based in the United Kingdom. Some of our service providers may process personal information outside the United Kingdom. Where this happens, we will ensure appropriate safeguards are in place as required by UK data protection law.

These safeguards may include:

- transferring personal information to a country covered by UK adequacy regulations;
- using the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses; or
- relying on another lawful transfer mechanism permitted by UK data protection law.

12. How long we keep personal information

We keep personal information only for as long as necessary for the purposes described in this privacy notice, including to satisfy legal, accounting, tax, reporting and customer service requirements.

Our typical retention periods are:

- **Order, transaction, invoice and accounting records:** normally 6 years from the end of the relevant financial year, unless a longer period is required for a dispute, audit, tax or legal reason.
- **Customer service and enquiry records:** normally up to 3 years after the enquiry is resolved, unless the matter relates to an order, complaint, product issue or legal claim.
- **Complaint, product issue, return and quality-control records:** normally up to 6 years after resolution, or longer where necessary for product safety, insurance, regulatory or legal reasons.
- **Marketing records:** until you unsubscribe or object, and then we retain a suppression record to ensure we do not send further marketing to you.
- **Cookie and analytics information:** for the period stated in the cookie settings tool or cookie policy for the relevant website.

- **Website security logs:** normally for a limited period needed for security and troubleshooting, unless a longer period is required to investigate suspected misuse, fraud or security incidents.

Where information is no longer needed, we will delete it, anonymise it or securely archive it.

13. Your rights

Under UK data protection law, you have rights in relation to your personal information. These rights are subject to conditions and exemptions, but they include the right to:

- **access** your personal information and receive a copy of it;
- **correct** inaccurate or incomplete personal information;
- **delete** your personal information in certain circumstances;
- **restrict** how we use your personal information in certain circumstances;
- **object** to certain uses of your personal information, including direct marketing and some uses based on legitimate interests;
- **data portability**, where the right applies;
- **withdraw consent**, where we rely on consent; and
- **complain** to the Information Commissioner's Office.

You can exercise your rights by contacting us using the details in section 2.

We may need to ask you for information to confirm your identity before responding to a rights request. This is to protect your personal information. We will respond within one month unless the law allows us to extend the response period for a complex request or multiple requests.

14. Your right to object to direct marketing

You have an absolute right to object to direct marketing. If you object, we will stop sending direct marketing to you. We may keep a suppression record so that we can respect your opt-out.

15. Withdrawing consent

Where we rely on consent, you can withdraw it at any time. This will not affect the lawfulness of any processing before consent was withdrawn.

You can withdraw marketing consent by using an unsubscribe link or contacting us. You can withdraw cookie consent using the cookie settings tool on the relevant website, where available, or by changing your browser settings.

16. If you do not provide personal information

Some personal information is required so that we can process your order, take payment, deliver products, deal with returns or comply with legal obligations. If you do not provide information that is necessary for these purposes, we may not be able to accept or fulfil your order, respond to your request or provide the relevant service.

17. Automated decision-making

We do not make decisions based solely on automated processing that produce legal effects concerning you or similarly significantly affect you. Payment providers and fraud-prevention providers may carry out automated checks as part of payment processing and fraud prevention. Where they do so, their own privacy notices may also apply.

18. Children

Our products and websites are not directed at children. We do not knowingly collect personal information from children for marketing or ecommerce purposes. If you believe a child has provided personal information to us, please contact us so that we can take appropriate action.

19. Security

We use appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, alteration or disclosure. These measures include using reputable service providers, access controls, secure payment processing arrangements and internal procedures for handling customer information.

No website, email system or online service can be guaranteed to be completely secure. Please take care when sending information to us electronically and keep any account login details secure.

20. Links to other websites

Our websites may contain links to third-party websites, plug-ins or services. We are not responsible for the privacy practices of those third parties. You should read their privacy notices before providing personal information to them.

21. Complaints

If you are unhappy with how we use your personal information, please contact us first using the details in section 2 so that we can investigate and respond.

You also have the right to complain to the Information Commissioner's Office, the UK regulator for data protection.

- **Website:** ico.org.uk
- **Telephone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

22. Changes to this privacy notice

We may update this privacy notice from time to time. The latest version will be made available on our websites. Where changes are significant, we may take additional steps to bring them to your attention.