

ROCHFORD BRADY
LEGAL SERVICES LIMITED (“RBLs”)
PRIVACY POLICY

RBLs is concerned about the protection of privacy and security. We will not disclose your personal information to any other party outside the Rochford Brady Group of companies.

All personal information necessary or available for the use of the Website will be governed by this RBLs privacy policy.

All of our enquiries are conducted in a manner that is fully compliant with Data Protection Legislation.

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and your rights in relation to your personal data. If you are a User or Customer, this Privacy Policy supplements any data protection provisions contained in our contract with you and is not intended to override them. Please read the following carefully to understand our views and practices regarding your personal data, how we will treat it and your data protection rights.

1 DEFINITIONS

“RBLs” means Rochford Brady Legal Services Ltd (Company number 206927)

Lawlink and CID are registered Business Names of RBLs and lawlink.ie and cid.ie are the websites operated by RBLs

“Websites” means lawlink.ie and cid.ie

“Account” means the User account established by Websites

“User” means the individual, company or organisation that is using Websites

“CRO” means Companies Registration Office

“Login Names” means the username provided to the User to access a Website search

“Database” means the data content and software on the Websites

“Data Protection Legislation” means the Data Protection Acts 1988 and 2003 (as amended), the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 and the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) (“**GDPR**”) and any other EU regulations, directives, decisions, opinions, codes of practice, guidelines or guidance on data protection, implementing legislation and all amendments, extensions or replacements thereto;

2 PERSONAL DATA WE COLLECT AND PROCESS

When registering for a User account, on the Websites and/or browsing the Websites, we will collect and gather the following categories of personal data:

Identity Data such as first name and surname.

Contact Data such as your address, e-mail address, telephone number.

Profile Data such as your username and password.

Financial Data: such as your payment details, information about payments to and from you and other details of services you have purchased from us.

Technical Data such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Websites.

Usage Data such as information about how you use the Websites and our Services.

Marketing and Communications Data such as your preferences in receiving marketing communications from us and third parties and your communication preferences.

2.1 Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you (e.g. Terms and Conditions and you don't provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the website service). In this case, we may not be able to provide all or part of the relevant service.

2.2 Data from Third Parties

In providing services to clients we will use the search criteria in queries with third parties. In many cases the third parties are central or local government bodies. In some cases we will use agents to help us fulfil client needs. Some of the data provided by government bodies will be of a personal nature (e.g. details of Bankruptcies, Judgments, Company Directorships). This data is publicly available and in handling it we will comply with GDPR Legislation.

3 HOW WE USE YOUR PERSONAL DATA

3.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances :

3.2 Where we need to perform the contract (e.g. the Terms and Conditions) we are about to enter into or have entered into with you.

3.3 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

3.4 Where we need to comply with a legal or regulatory obligation.

3.5 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via

email or telephone. You have the right to withdraw your consent at any time by contacting us.

3.6 We do not request from you and we request you do not provide any special categories/sensitive personal data (e.g. personal data relating to racial or ethnic origin, political or religious opinions, membership of a trade union, physical or mental health or condition or sexual life or orientation). This type of personal data is subject to special protections under EU law.

3.7 We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us using the contact details provided below if you need details about the specific legal ground we are relying on to process your personal data.

3.8 **YOUR LEGAL RIGHTS**

Under certain circumstances you have rights under applicable data protection law in relation to personal data, namely:

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

automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time if and to the extent we are relying on consent as the legal basis to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Regarding your right to have your personal data erased, you can delete your user account with us at any time. Deleting your user account archives records of your User information with us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

In order to exercise one or more of your rights in respect of your personal data, you can do so by contacting us using the information provided in the Contact Us section below. We will respond to your request(s) as soon as reasonably practicable, but in any case within the legally required period of time.

You have the right to make a complaint at any time to the Data Protection Commission, the Irish supervisory authority for data protection issues (www.dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the Data Protection Commission so please contact us in the first instance using the information listed in the Contact Us section below.

4 MARKETING

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us if you have requested information from us or purchased services from us, or if you provided us with your details when you entered a competition or registered for a promotion, and, in each case, you have not opted out of receiving that marketing. You can opt out of any marketing communications from us at any time by using the “Unsubscribe” function at the bottom of the marketing email we send you.

5 DISCLOSURE OF DATA TO OTHERS

Except as set out in this Privacy Policy, we do not disclose to any third party personal data that we collect or you provide to us.

We may disclose your personal data to third parties expressly mentioned in this Privacy Policy and the following third parties:

- 5.1 If you have indicated at registration, or at any time during your time as a user of the Website, that you are happy to receive information or promotions from selected third parties about goods and services which may be of interest to you, we will send you such offers or information. See Marketing above on how to change your preferences;
- 5.2 any member of our group of companies, which means our subsidiaries, our ultimate holding company and its subsidiaries, where it is necessary to do so for the provision and administration of the services we provide to you;
- 5.3 we contract with other entities that perform certain tasks on our behalf and who are under our control (“Service Providers”). This is required in order to provide and manage the Website and one or more Service. Such Service Providers include IT systems suppliers and support, data storage, IT developers, insurance, credit card companies, payment processors, analytics companies, website hosting providers and other service providers;
- 5.4 professional advisors such as accountants, auditors, lawyers, bankers, insurers, and other outside professional advisors;
- 5.5 third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy;
- 5.6 entities that regulate or have jurisdiction over our business. We will disclose your personal data in order to comply with any legal obligation, if we are ordered to do so by a court of competent jurisdiction, law enforcement, regulatory or administrative authorities or in order to enforce or apply our Terms and Conditions and other agreements, or to protect the rights, property, or safety of our Customers, Website users or others. This includes exchanging personal data with third parties for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Unless prevented by applicable law, we will notify you when your personal data may be provided to third parties in ways other than explained above, and you may have the option to prevent such sharing at the time that we notify you.

6 CUSTOMER AS CONTROLLER

- 6.1 as Customer, you are the Data Controller (within the meaning of Data Protection Legislation) of the personal data you obtain from us, and we do not have any access to, or control over your use of personal data which is supplied to you under our Services. You warrant that your use of such personal data shall comply with Data Protection Legislation and you agree that you indemnify and agreed to keep us indemnified, against all loss, damage costs and expenses incurred by us as a result of your use of that personal data. Our Services are strictly provided to you on this basis.

7 RECTIFICATION OF DATA

Log in passwords are personal to the User and should not be shared with third parties. The User is responsible for the safekeeping of their password. RBLs is not responsible for any loss or damage suffered by a User as a result of other parties

accessing the website using their passwords. RBLs will be indemnified against any loss incurred by them as a result of such use.

The User shall notify RBLs in writing of any change in the information provided for their Website account.

It is the responsibility of the User to keep their account contact details and email address up-to-date. If a User's email address changes the User agrees to notify RBLs of the new email address. A User's account may be automatically opted-out of receiving emails from RBLs if the User's email account no longer appears to be in service or after a certain number of bounce backs occur from the User's email address, or if their email domain ceases to exist. RBLs takes no responsibility for any loss or damage incurred by the client as a result of not receiving emails due to their email address being automatically opted-out in this manner.

The user acknowledges all data accessed from RBLs service will be used in accordance with the latest Data Protection legislation. This includes restricting the use of a Director's home address for marketing purposes.

8 LINKS AND ACCESS TO THIRD-PARTY SITES

Links to or from web sites and resources may be provided on our site. These links are provided solely as a convenience to the User of this site. We suggest you read the Terms and Conditions and Privacy Policies of these websites before using or visiting them. No responsibility will be accepted by RBLs for the service or advertisement placed or provided through our website.

9 RETENTION POLICY & PROCESSING SECURITY

All information gathered by the use of the website will be stored in accordance with professional best practice to protect against unauthorised access.

RBLs implements technical and Organisation measures, to protect personal data against accidental or unlawful destruction, or accidental loss or alteration, and unauthorised disclosure or access and against all other unlawful forms of processing.

10 COMPLETE AND UP-TO-DATE

RBLs will have procedures that are adequate to ensure high levels of data accuracy to keep personal data up-to-date.

COOKIES POLICY

RBLs respects the privacy of all visitors to our Websites. Our policy can be found at <http://www.lawlink.ie/LawLink/cookie-policy.jsp> and <http://cid.ie/CID/cookie-policy.jsp>

Our Cookie Policy may be updated from time to time to reflect any changes in technology or legislation which may affect the way in which cookies are used by us and how you as a user, can manage them.

CONTACT US

If you have any questions about our Privacy Policy, Terms of Use or any other aspect of this website, please contact us at Rochford Brady Legal Services Limited, First Floor, Ormond Building, 31-36 Ormond Quay Upper, Dublin 7, D07 DX53