

Privacy Statement

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INTRODUCTION

About this statement and how to read it

The purpose of this document is to provide information to you about the use of your personal data by Browne Murphy & Hughes, registered number 403854, and having its registered office at 28 Upper Fitzwilliam Street, Dublin 2 ("**BMH**" or "**we**"). At BMH we respect your right to privacy and we handle your personal data in accordance with our obligations under the General Data Protection Regulation EU 2016/679 ("**GDPR**") and the Data Protection Act 2018 ("**the Act**") (together "**Data Protection Law**").

This document outlines what personal data we, as data controller, collect and process in our dealings with you, how and why we process those personal data and what your rights are in respect of your personal data.

The statement has been written to provide you with clear and transparent information in an easy to understand format. To help with this, the statement is split into three sections:

- (i) PART A "SPECIFIC INFORMATION": This contains different sections for each type of individual whose personal data we process, with each section providing information on how we process personal data specifically belonging to that type of individual. So to understand how we process your personal data, go to the section(s) that relates to you.
- (ii) PART B "GENERAL INFORMATION": This contains information about processing that is relevant to ALL individuals.
- (iii) PART C "YOUR RIGHTS": This contains information about your rights under Data Protection Legislation.

Contact

If you have any questions about our privacy statement, your rights, or how we use your information, please do not hesitate to contact us here at BMH:

Post: Data Protection, Browne Murphy & Hughes, 28 Upper Fitzwilliam Street, Dublin 2, Ireland
Tel: 01 6619142
Email: contact@bromu.ie

Changes to this statement

We will update this Privacy Statement from time to time. Any changes will be made available on our website and, where appropriate, notified to you by written notice or e-mail.

PART A: SPECIFIC PROCESSING INFORMATION

1. JOB APPLICANTS

Where you have applied for a job with BMH, this section relates to you.

1.1. How we collect your personal data

Information about you, including your personal data, is gathered when you apply for a job with us either directly or indirectly via employment agencies we work with, an introducer who has referred you to us or via our third level education partners. We also may obtain personal data indirectly from referees you nominate to us or from your professional social media profile link you provide to us as part of the job application.

1.2. The personal data we use

BMH will process and use all personal data included in your CV, job application correspondence and collected as part of the application process, including:

- IDENTITY DATA, including your
 - first name, surname, salutation;
 - date of birth (if included on your CV);
 - photographic identification, where your photograph is included on your CV;
- CONTACT DATA, including your email address, home address, telephone number(s);
- PREFERENCES, in respect of the job you are applying for with us;
- OCCUPATIONAL, including
 - the name of your employer, your job title and department;
 - your employment and education history and any other information contained in a CV provided to us as part of a job application;
- STATEMENTS ABOUT YOU, including
 - references we obtain from your nominated referees as part of a job application;
 - notes we make in relation to your suitability;
 - statements made as part of the interview and evaluation process when you apply for a job with us;

1.3. The purpose and legal basis for processing your personal data

We process your personal data for the purpose of recruiting staff. This includes the following, which we deem necessary for the purposes of entering into an employment contract with you (i.e. assess your suitability to enter into the contract):

- Identifying you and processing your job application;
- Verifying the information you provided and assessing your suitability for the role;
- Making a decision on whether to offer you a job and the provision of feedback to you in relation to your application;

We may also need to use your personal data for the purpose of satisfying our employment law obligations, in particular in relation to equality.

1.4. Who we share your personal data with

Your personal data will be shared to relevant staff within BMH but also to a limited number of third parties where it is necessary to do so, including:

- (i) To your nominated referees;
- (ii) To third party companies or individuals who are providing recruitment services to us;
- (iii) To third parties who are providing services to us to enable us to manage the relationship with you, including our software and IT support providers;
- (iv) To statutory, regulatory, government or law enforcement bodies as required by law;

Where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data.

1.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to consider a job application from you and failure to provide this information may result in us not being able to consider you for the position or role.

1.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary. For example, we immediately delete any applications we receive from individuals once they are deemed to be an unsuitable fit for us. For individuals who are employed by us, information about our handling and retention of their personal data is contained within our internal privacy statement for staff.

2. WEBSITE VISITORS

Cookies

Cookies are small text files that can be used by websites to make a user's experience more efficient. This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages. Please see our Cookies Policy for more information.

3. INDIVIDUALS CONNECTED TO OUR FORENSICS SERVICES

Our Forensics Services provide clients (“Forensic Clients”) with assistance with the financial aspects of litigation or disputes (“Forensic Case”).

Whether you are a Forensic Client or another individual related to the Forensic Case (“Forensics Connected Person”), this section relates to you.

3.1. How we collect your personal data

Information about you, including your personal data, is gathered initially via the Forensic Client onboarding where we obtain basic information to enter in to a letter of engagement, proof of ID/address/other relevant information for anti-money laundering and countering terrorist financing purposes and a sworn affidavits of means and or pleadings from the Forensics Client’s appointed legal representative.

Subsequent to our initial analysis, we gather additional information from the Forensic Client’s appointed legal representative but also may gather information:

- (i) Directly from the Forensic Client where we need to interact directly for the purposes of seeking further information in relation to the case; and
- (ii) From third parties, such as:
 - a. The opposing party’s appointed legal representatives, as part of legal discovery;
 - b. The opposing party’s appointed accountant, subject to agreement between the Forensic Client and opposing party;
 - c. The Forensic Client’s bank, subject to a letter of authority from the Forensic Client;
 - d. Independent and publicly available sources of information such as the Companies Registration Office, Vision Net, online search engines, published articles and professional social network LinkedIn.

3.2. The personal data we use

The personal data we process are those ***contained within the Sworn affidavits of means and/or pleadings*** and ***any further information gathered from the sources outlined above***. This will include all information and personal data specific to the relevant case, such as:

- IDENTITY DATA, including your first name, surname, maiden name, salutation, business name, date of birth, government issued ID (Forensic Client only), photograph (Forensic Client only), gender, nationality, signature;
- CONTACT DATA, including your email address, home address, business address, telephone number(s);
- RELATIONSHIP DATA, including information about your marriages, divorces, siblings, family structure, children, business relationships;
- OCCUPATIONAL DATA, including your employer, job title, leave information (in loss of earnings cases), director information from the CRO, qualifications and educational background;
- FINANCIAL DATA, including any financial information relevant to the case you are involved in such as bank account details and statements, debit/credit card details and statements, tax numbers, tax records, income (e.g. annual income, rental, etc.) and expenditure details (all

outgoings), assets (e.g. property, vehicles, investments, shares, companies and/or business enterprises owned, pensions, bank accounts, debtors, director loans, etc.) and liabilities (e.g. loans, guarantees, insolvency/bankruptcy, etc.), copies of leases, invoices (sole trader only), etc;

- HEALTH DATA, including any health matters covered in the sworn affidavits;
- STATEMENTS ABOUT YOU, as per the sworn affidavit of pleadings or during the legal case proceedings;

3.3. The purpose and legal basis for processing your personal data

We only process your personal data for presentation of information to the courts as part of a Forensic Client's legal case or for the mediated or collaborative resolution of a dispute where both parties to the dispute have entered into an agreement to resolve the dispute in a collaborative way.

We only process your personal data where it is lawful and necessary to do so, and only for the purpose of the legal case or collaborative dispute resolution case for which we are appointed. As such, your personal data are processed as follows:

- We process your personal data for the purposes of entering into and performing a Forensics Services agreement, including establishing the Forensics Client's eligibility to enter in to the agreement and then performing the Forensics Services (this may include the provision of services to assist the Forensics Client in complying with legal obligations such as family law obligation to have affidavits vouched or a court order for discovery);
- To enable us to comply with our legal, statutory and regulatory obligations including anti-money laundering law in relation to Forensic Client onboarding or the "in camera" rules of the courts in respect of family law cases which protect information disclosures;
- Where you have provided us with consent to obtain information directly from your bank to facilitate our financial investigation work; and
- To manage our everyday business needs in line with our legitimate interests, such as risk management, accounting, business continuity, complaint management, troubleshooting, technical support, protection of our assets and information, and to establish, exercise and safeguard our rights.

3.4. Who we share your personal data with

In accordance with our family law obligations, the case and all details are "in camera" meaning no information can be discussed with or furnished to anyone not legally engaged in the case.

In line with the legal case, we only share information with:

- (i) The Forensics Client;
- (ii) The Forensics Client's appointed legal representative;
- (iii) The opposing party's appointed legal representative;
- (iv) The opposing party's appointed accountant, if agreed to between both parties to the case;
- (v) The Forensics Client's bank for the purpose of obtaining information directly from the bank, if authorised to do so by the Forensics Client;

- (vi) To third parties who are providing services to us to enable us to provide the Forensics Services as per the agreement with our Forensic Client and enable us to meet our legal obligations, including our software providers and IT support providers (note that where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data);
- (vii) To statutory, regulatory, government or law enforcement bodies as required by law;

3.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to perform the Forensics Services and failure to provide this information may result in us not being able to establish an individual's eligibility for the Forensics Services and therefore not being able to enter such an agreement.

3.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

4. INDIVIDUAL OR SOLE TRADER CLIENTS

Where you, as an individual or sole trader, are a client of one or more of our accounting services (e.g. taxation, bookkeeping, etc.), this section relates to you.

4.1. How we collect your personal data

We gather your personal data from both direct and indirect sources. We collect personal data:

- (i) Directly from you. Examples include when you:
 - a. Engage with us about becoming a client and obtaining our services;
 - b. Provide basic information required to enter in to a letter of engagement;
 - c. Provide proof of ID, proof of address and related information for anti-money laundering and countering terrorist financing purposes;
 - d. Provide information to us to enable us to provide you with our services;
 - e. Interact directly with us via telephone, email, post and/or in person;

- (ii) From third parties. Examples include collection from:
 - a. Introducers or common business associates who may pass on your details to us and may refer that you have an interest in our services;
 - b. Your previous accountant for professional clearance to act on your behalf;
 - c. Your stockbroker, your bank and any other third party involved in managing your financial affairs (where you have authorised us to do so);
 - d. Revenue, subject to us being appointed as your agents;
 - e. Our banking providers, in relation to transactions with you;

4.2. The personal data we use

The personal data we process are all those required to provide our services to you and manage aspects of your finances on your behalf. The information and personal data can therefore be wide ranging and may include:

- IDENTITY DATA, including your first name, surname, maiden name, salutation, business name (if sole trader), date of birth, government issued ID, photograph, gender, nationality, signature;
- CONTACT DATA, including your email address, home address, business address (if sole trader), telephone number(s);
- RELATIONSHIP DATA, including information about your marriages, divorces, siblings, family structure, children, business relationships, dependants;
- OCCUPATIONAL DATA, including your employer, job title, leave information (in loss of earnings cases);
- FINANCIAL DATA, including any financial information relevant to the services we provide to you such as bank account details and statements, debit/credit card details and statements, tax numbers, tax records, income (e.g. annual income, rental, etc.) and expenditure details (all outgoings), assets (e.g. property, vehicles, investments, shares, pensions, bank accounts, debtors, director loans, etc.) and liabilities (e.g. loans, guarantees, insolvency/bankruptcy, etc.), copies of leases, invoices (sole trader only), etc;

4.3. The purpose and legal basis for processing your personal data

We only process your personal data where it is lawful and necessary to do so. Your personal data are processed as follows:

- Our legitimate interests to identify new business opportunities, develop enquiries, generate new business leads and develop a business relationship with you;
- We process your personal data for the purposes of entering into and performing a services agreement, including establishing your eligibility to enter in to the agreement and then performing the services;
- To enable us to comply with our legal, statutory and regulatory obligations including anti-money laundering and countering terrorist financing law in relation to onboarding you as a client and keeping our own accounting and taxation records in accordance with company and taxation law respectively;
- Where you have provided us with consent to obtain information directly from your stockbroker, your bank or another relevant third party involved in managing your financial affairs; and
- To manage our everyday business needs in line with our legitimate interests, such as risk management, accounting, business continuity, complaint management, troubleshooting, technical support, protection of our assets and information, and to establish, exercise and safeguard our rights.

4.4. Who we share your personal data with

We do not share your personal data with third parties unless it is necessary. Sharing occurs with a limited set of individuals and organisations and in limited circumstances. Examples of when sharing may occur and the third parties to whom we share your personal data are as follows:

- (i) Your stockbroker, your bank, your legal representative, or any other third party you have provided us with authorisation to obtain and share information with;
- (ii) The Revenue Commissioners, where you have appointed us as your tax agent;
- (iii) Your clients and suppliers, where you have appointed us to manage your amounts receivable and amounts payable;
- (iv) To third parties who are providing services to us to enable us to manage the relationship with you. For example, our software providers, our IT support providers, our professional advisors and our financial statement auditors. Where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data; and
- (v) To statutory, regulatory, government or law enforcement bodies as required by law.

4.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to perform the services and failure to provide this information may result in us not being able to provide such services.

4.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

5. INDIVIDUALS CONNECTED TO CORPORATE CLIENTS

In our business to business relationships with companies or organisations that are potential, existing or legacy BMH clients of our accounting services (“Corporate Clients”), we will process some personal data belonging to individuals who are connected to those Corporate Clients in the capacity of an employee, director, shareholder, authorised signatories, power of attorney holders, business associate, promoter, customer, supplier, or otherwise. If you fall into this category, this section relates to you.

5.1. How we collect your personal data

We gather your personal data from both direct and indirect sources. We collect personal data:

- (iii) Directly from you. Examples include when you, on behalf of the Corporate Client:
 - a. Engage with us about becoming a client and obtaining our services;
 - b. Provide basic information required to enter in to a letter of engagement;
 - c. Provide proof of ID, proof of address and related information for anti-money laundering and countering terrorist financing purposes;
 - d. Provide information to us to enable us to provide the Corporate Client with our services;
 - e. Interact directly with us via telephone, email, post and/or in person;

- (iv) From third parties. Examples include collection from:
 - a. The Corporate Client;
 - b. Introducers or common business associates who may pass on your details to us and may refer that the Corporate Client has an interest in our services;
 - c. The Corporate Client’s previous accountant for professional clearance to act on the Corporate Client’s behalf;
 - d. Representatives or other third parties involved in managing the Corporate Client’s financial affairs (where you have authorised us to do so);
 - e. Revenue, subject to us being appointed as the Corporate Client’s taxation agents;
 - f. Our banking providers, in relation to transactions with the Corporate Client;
 - g. Publicly available information. For example, from company registers (including the Companies Registration Office), press publications, electoral register, online search engines and related results;
 - h. Company information databases, such as Vision-Net.ie, including information on directors, shareholdings, judgments, bankruptcies and more (directors and shareholders only).

5.2. The personal data we use

The personal data we process are all those required to provide our services to the Corporate Client and manage aspects of the Corporate Client’s finances on its behalf. The information and personal data can therefore be wide ranging and may include:

- IDENTITY DATA, including your first name, surname, maiden name, salutation, business name (if sole trader), date of birth, government issued ID, photograph, gender, nationality, signature;
- CONTACT DATA, including your email address, home address, business address (if sole trader), telephone number(s);
- RELATIONSHIP DATA, including information about relationship to the Corporate Client;
- OCCUPATIONAL DATA, including your employer, job title, leave information (in loss of earnings cases);
- FINANCIAL DATA, including any financial information relevant to the services we provide to the Corporate Client such as
 - your PPS number, bank account details, employment income, income tax, health insurance, assets (e.g. shareholding, vehicle information for expense reclaims, pensions, director loans, etc.) and/or liabilities (e.g. company loans, guarantees, insolvency/bankruptcy, etc.) where you are an employee, director or shareholder of the Corporate Client;
 - transaction information, including your VAT number and bank account details, where you are a supplier or customer of the Corporate Client;
 - lease information where you are letting to/from the Corporate Client;
- SPECIAL CATEGORY DATA, including trade union subscription fees (for payroll purposes).

5.3. The purpose and legal basis for processing your personal data

We only process your personal data where it is lawful and necessary to do so. Your personal data are processed as follows:

- Our legitimate interests to identify new business opportunities, develop enquiries, generate new business leads and develop a business relationship with you and the Corporate Client;
- We process your personal data for the purposes of entering into and performing a services agreement, including establishing the Corporate Client's eligibility to enter in to the agreement and then performing the services;
- To enable us to comply with our legal, statutory and regulatory obligations including anti-money laundering law and countering terrorist financing law in relation to onboarding the Corporate Client as a client and keeping the Corporate Client's accounting and taxation records in accordance with company and taxation law respectively;
- Where you are an employee of the Corporate Client and where you are paying subscription fees to a trade union, this information is processed as part of payroll services to the Corporate Client and in accordance with the Corporate Client's employment of you, pursuant to the Irish Data Protection Act Section 46; and
- To manage our everyday business needs in line with our legitimate interests, such as risk management, accounting, business continuity, complaint management, troubleshooting, technical support, protection of our assets and information, and to establish, exercise and safeguard our rights.

5.4. Who we share your personal data with

We do not share your personal data with third parties unless it is necessary. Sharing occurs with a limited set of individuals and organisations and in limited circumstances. Examples of when sharing may occur and the third parties to whom we share your personal data are as follows:

- (i) To the Corporate Client;
- (ii) To the Corporate Client's authorised representatives;
- (iii) The Revenue Commissioners, where the Corporate Client has appointed us as its' tax agent;
- (iv) To the Corporate Client's customers and suppliers, where the Corporate Client has appointed us to manage your amounts receivable and amounts payable;
- (v) To third parties who are providing services to us to enable us to manage the relationship with you and the Corporate Client. For example, our software providers, our IT support providers, our professional advisors and our financial statement auditors. Where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data; and
- (vi) To statutory, regulatory, government or law enforcement bodies as required by law.

5.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to perform the services and failure to provide this information may result in us not being able to provide such services.

5.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

6. SUPPLIERS (SOLE TRADERS)

6.1. How we collect your personal data

As a supplier or service provider to BMH, we collect your personal data directly when you interact with us via telephone, email, post, fax and/or person (e.g. meetings, events, conferences, etc.). We may also collect personal data from third party sources, examples of which include

- (i) From publicly available information. For example, from company registers, press publications, trade directories and online search engines and related results;
- (ii) Introducers or common business associates who may pass on your details to us;
- (iii) Referees you nominate to us as part of tendering for work with us;
- (iv) Third parties who provide services to you (e.g. your representatives, advisors, delivery drivers, etc.);
- (v) Our banking providers, in relation to transactions with you;

6.2. The personal data we use

Our relationship with you as a supplier is a business to business relationship and the personal data processed is limited to those necessary to establish a relationship with you and obtain your services, including:

- IDENTITY DATA, including your first name, surname, salutation, business name;
- CONTACT DATA, including your email address, business address, billing address, telephone number(s);
- OCCUPATIONAL, including;
 - information about your past/current clients, past/current projects and any other information that may be considered by us when assessing your suitability to provide a service; and
 - relevant insurance and/or health and safety details where required.
- FINANCIAL, including bank account details and VAT or other relevant tax details to facilitate transactions with you, as well as your transactional and account history with BMH;

6.3. The purpose and legal basis for processing your personal data

We will only process your personal data where it is lawful and necessary to do so.

Typically, your personal data are processed for the purpose of entering into and performing a contract with you as a supplier to BMH, including when we:

- Make an inquiry to purchase a product or service from you;
- Avail of the products and/or services from you as a supplier;
- Transact with you and make payments to you pursuant to the contract;
- Establish, exercise or defend legal claims in relation to the contract;
- Correspond with you throughout the relationship.

Your personal may also be used:

- To enable us to comply with our legal, statutory and regulatory obligations. For example, your personal data may be included in our returns to the Revenue Commissioners in complying with taxation law, as part of the preparation and audit of financial statements in compliance with company law and for compliance with legally binding requests from regulatory bodies, law enforcement agencies, the courts or otherwise;
- To manage our everyday business needs in line with our legitimate interests, such as accounting, complaint management, troubleshooting, technical support, protection of our assets and information, and fraud prevention.

6.4. Who we share your personal data with

We do not share your personal data with third parties unless it is necessary. Sharing occurs with a limited set of individuals and organisations and in limited circumstances. Examples of when sharing may occur and the third parties to whom we share your personal data are as follows:

- (i) To third parties who are providing services to us to enable us to manage the relationship with you. For example, our software providers, our IT support providers, our professional advisors and our financial statement auditors. Where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data
- (ii) To our bank when we are transacting with you; and
- (iii) To statutory, regulatory, government or law enforcement bodies as required by law.

6.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data in order to be able to enter into an agreement with you in order to avail of your services and failure to provide this information may result in us not being able to enter into such an agreement.

6.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

7. REPRESENTATIVES OF THIRD PARTY LEGAL ENTITIES

7.1. How we collect your personal data

In our business to business relationships with third party companies and organisations (e.g. suppliers, state bodies, or otherwise), we will process some personal data belonging to individuals who represent those companies and organisations in the capacity of an employee, director or otherwise. If you fall into this category of individual where you are representing a company or organisation (“Your Organisation”), we gather your personal data from both direct and indirect sources:

- (v) Directly from you. Examples include when you, on behalf of Your Organisation:
 - a. Interact directly with us via telephone, email, post, fax and/or in person;
 - b. Provide information as part of an inquiry about a service to or from us;
 - c. Purchase our services or provide us with services and conduct transactions with us;

- (vi) From third parties. Examples include collection from:
 - a. Publicly available information. For example, from press publications, online search engines and related results.
 - b. Referees you nominate to us as part of Your Organisation tendering for work with us;
 - c. Introducers or common business associates who may pass on your details to us;
 - d. Third parties who provide services to Your Organisation (e.g. your representatives, advisors, delivery drivers, etc.).

7.2. The personal data we use

As you are acting on behalf of Your Organisation and not a personal capacity, the personal data we use for the business to business relationship is limited and includes:

- IDENTITY DATA, including your first name, surname, salutation, signature on signed documents;
- CONTACT DATA, including your business email address, business telephone number(s);
- OCCUPATIONAL, including the name of Your Organisation and your job title,
- OPINIONS, where you consent to provide testimonials or references.

7.3. The purpose and legal basis for processing your personal data

We will only process your personal data where it is lawful and necessary to do so, including

- For the purpose of taking steps to enter into and perform a contract to obtain services from Your Organisation;
- To enable us to comply with our legal, statutory and regulatory obligations. For example, Your Organisation may be a government body with whom we need to interact as part of our legal obligations and your personal data will be used to manage this relationship;
- Where you have provided us with consent to use your personal data for marketing or referral purposes;

- To manage our everyday business needs in line with our legitimate interests, such as customer service, accounting, complaint management, troubleshooting, technical support, fraud prevention, protection of our assets and information, and fraud prevention.
- Establish, exercise or defend legal claims;

7.4. Who we share your personal data with

We do not share your personal data with third parties unless it is necessary. Sharing occurs with a limited set of individuals and organisations and in limited circumstances. Examples of when sharing may occur and the third parties to whom we share your personal data are as follows:

- (i) To third parties who are providing services to us to enable us to manage the relationship with you. For example, our software providers, our IT support providers, our professional advisors and our financial statement auditors. Where we enter into agreements with third parties to process your personal data on our behalf, we will ensure that appropriate contractual protections are in place to protect the security of the data; and
- (ii) To statutory, regulatory, government or law enforcement bodies as required by law.

7.5. Consequences of not giving your data to us

You are not under any obligation to provide your personal data to us. However, we do need some personal data to be able to enter into an agreement with Your Organisation in order to avail of Your Organisation's goods or services and failure to provide this information may result in us not being able to enter into such an agreement.

7.6. How long we keep your personal data for

Personal data is kept in a form, which permits data subject identification only for as long as is permitted while following fair and lawful processing. No personal data will be kept for a period longer than necessary.

PART B: GENERAL PROCESSING INFORMATION

1. How we keep your personal data safe

Appropriate security measures are implemented in order to protect your personal data. Security measures refer to physical security in the office as well as implementing appropriate technology and cyber security measures across our systems and networks in order to prevent any accidental or unauthorised access, interference, damage, loss or disclosure of personal data.

In the event of certain types of personal data breaches, we are legally obliged to notify the Data Protection Commission and affected individuals to whom the personal data belong. We have implemented internal procedures to manage personal data security breaches in accordance with our legal obligations.

2. Transfers outside the European Economic Area

In connection with the above purposes we do not currently transfer your personal data to third parties outside the European Economic Area (“EEA”). If and to the extent we ever do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include:

- (i) to a jurisdiction which has been subject to an “Adequacy” decision from the European Commission, meaning the jurisdiction is recognised as providing for an equivalent level of protection for personal data as is provided for in the European Union;
- (ii) entering into a contract governing the transfer which contains the “standard contractual clauses” approved for this purpose by the European Commission; or
- (iii) in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework.

PART C: YOUR RIGHTS

You have a number of rights in respect to your personal data. These are:

- (i) The right to **access** your personal data, which includes receiving confirmation on whether the personal data are being processed and if so, receiving the personal data and related information about why they are being processed, the categories of personal data involved, to whom the personal data have been or will be shared and how long the data will be kept for. We will accede to any such valid requests within one month of the receipt of a valid request in writing
- (ii) The right to request that we **rectify** inaccurate data or update incomplete data. You may also request that we restrict the processing of the personal data until the rectification or updating has been completed, although please be aware that we may have to suspend the operation of your account or the products or services that we provide.
- (iii) The right to request that we **erase** your data under certain circumstances, including where you want to withdraw the consent you previously gave to us, where you object to BMH's processing the data for its own legitimate interests or where BMH's processing of the data is unlawful. In the case of unlawful processing, you can also request that this processing is restricted rather than the personal data being erased. Please be aware that we may have to suspend the operation of your account or the products or services that we provide where data processing is restricted.
- (iv) The right to **object** to the processing of your personal data, where such processing is being conducted for the purpose of:
 - a. Direct marketing (note that we do not currently conduct direct marketing, but your right to object exists if we ever do process your personal data in this way);
 - b. Establishing, exercising or defending ourselves or others from legal claims; or
 - c. Our legitimate interests, unless we can demonstrate that our interests override your interests and rights. You may request that we restrict the processing of the personal data until this analysis of legitimate interests has been concluded, although please be aware that we may have to suspend the operation of your account or the products or services that we provide where data processing is restricted.
- (v) The right to receive your data in a **portable** format or, subject to it being technically feasible, have us transfer it directly to a third party. This applies where you have provided us with consent for the processing or where the processing is necessary for entering a contract with us.
- (vi) The right, at any time, to **withdraw consent** you have provided to us to process your personal data.
- (vii) The right to **lodge a complaint** to the Data Protection Commission or another supervisory authority. The Office of the Data Protection Commission can be contacted at:

Email:	info@dataprotection.ie
Telephone:	+353 (0)761 104 800
Postal Address:	Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28

If you wish to raise a complaint in relation to how we processed your personal data, please contact us. We take your privacy and data protection very seriously in BMH and we endeavour to address your complaint as expediently and as thoroughly as we can in order to find a satisfactory resolution for you.