

MURPHY MULHALL  
PRIVACY POLICY  
MAY 2018

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## General Statement

At Murphy Mulhall & Partners Limited (hereinafter called “Murphy Mulhall”), we value our clients and take pride in providing you with the best quality of service.

Murphy Mulhall collects certain personal information about you to facilitate our relationship. We know how much you value your privacy. We at Murphy Mulhall are committed to keeping your information secure. Therefore, we provide this Privacy Policy to outline the information Murphy Mulhall will collect and how that information will be used. Additional policies and procedures described in our Terms and Conditions of Business should be reviewed.

## Privacy Principles

- Murphy Mulhall is committed to protecting the privacy of our client’s personal data.
- Murphy Mulhall makes every effort to protect all personal data, such as name, email address, mailing address, company name, phone number, mobile phone number that we obtain.
- Murphy Mulhall maintains physical, technological and administrative safeguards to protect personal data.
- Murphy Mulhall permits only authorised employees and contractors, including but not limited to consultants, to have access to some or all personal data of our customers as needed.

## Consent

Murphy Mulhall does not collect, use, or share personal data without your consent. You have the right to withdraw your consent at any time. The reason we collect personal data and how it is used is included in this privacy policy under Use.

## Collection of your Personal Data

Murphy Mulhall obtains and uses personal data, as defined below, for its business use and for local, national related reporting requirements.

We may collect, store and use the following kinds of data. Providing personal data to us is voluntary. However, if you do not provide personal data to us, then we will not be able to provide you with the respective functionality offered by our website:

- Browser based data such as IP Address, geographical location, browser type and version, operating system, referral source, etc
- Personal data such as name, email address, mailing address, company name, phone number, mobile phone number
- Information for subscribing to our email newsletters
- Information submitted as a web request through our web based online Forms
- Personal data that is submitted in regard to or on behalf of other person(s) will only be accepted once consent has been received from that person(s) and documented.

## Use of your Personal Data

We use the data collected for marketing our products and providing continuing services. Personal data submitted via the website may be used for the purposes outlined in this policy.

Authorised use of personal data includes:

- Confirmations, statements, invoices, or other necessary emails to ensure a high level of customer service
- Non-marketing email communication
- Newsletters and other email communication mailing lists that you have subscribed to
- Sending notification on updates to this policy
- Clients have the option of providing, or not providing, consent and use of their personal data.

## Sharing of Information

We will not sell, share, or otherwise distribute your personal data to third parties (vendors/processors / providers/others) except as provided in this Privacy Policy. Murphy Mulhall may share personal data to other third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed. Doing so allows us to efficiently conduct our business.

We believe these providers exercise reasonable care to protect your personal data. These third parties have contracted with us to only use personal data for the agreed upon purpose, and not to sell your personal data to third parties, and not to disclose it to other third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.

Your personal data may also be disclosed, if necessary, as required by law or regulation, to comply with legal, regulatory or administrative requirements of any governmental authorities, to comply with a court order, subpoena, search warrant or other valid legal process, in connection with any legal action, claim or dispute and for the protection of persons or property.

## Data Retention and Destruction

Murphy Mulhall keeps personal data for as long as is necessary for fulfilment of each use described in this policy, or as legally required by appropriate local, national, EU-based and other regulatory bodies. Past that period, records, both physical and electronic, are destroyed.

## Cookies and Other Technologies

Cookies are used on this website. By using our website, you agree that cookies are to be placed on your device as further explained below.

Cookies are small pieces of data that a website sends to your computer's web browser while you are navigating through it. They have many different purposes, but mainly, cookies enable you to navigate between pages easily, remembering your preferences, and eventually to improve the user experience. These cookies may then be stored on your machine to identify your computer.

Cookies used on this website can be either set up by our website or by a third-party website. Moreover, these cookies can be “session” or “persistent” cookies: a session cookie is a cookie that is automatically deleted when the user closes the browser, whereas a persistent cookie is a cookie that remains stored in the user's terminal device until it reaches a defined expiration date. Cookies used on this website have a maximum lifetime of 12 months.

## Types of Cookies

We use several types of cookies on this website, as follows:

### Functionality Cookies

These cookies allow a website to remember choices you make and provide enhanced, more personal features. For instance, a website may be able to provide you with local information or news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. These cookies cannot track your browsing activity on other websites. They do not gather any information about you that could be used for advertising or remembering where you have been on the internet outside our website.

Functionality cookies used on the Murphy Mulhall website:

- Facebook Social Graph (Uses a Facebook plugin to track likes and follows)

### Performance Cookies

These cookies are used to collect information about how visitors use a website, for instance which pages you go to more often, and if you get error messages from web pages. All information collected by means of these cookies is anonymised, aggregated and only used to develop and track traffic patterns and the volume of use of our website and to improve how our website works. This information is for Murphy Mulhall's exclusive use and is not shared with any third-party or connected to any other information.

Performance cookies used on the Murphy Mulhall website:

- Google Analytics (Sends details back to Google Analytics to compile reports on website data to gain customer insights)

## Targeting Cookies

These cookies are used to deliver advertisements that are targeted to be relevant to you, limit the number of times you see an advertisement, and help measure the effectiveness of the advertising campaign. They are usually placed by advertising agencies with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often they will be linked to a website functionality provided by the other organisation.

Targeting cookies used on the Murphy Mulhall website:

- Add This (Allows Murphy Mulhall to make its website content shareable on social media sites)

## Use of Cookies

Murphy Mulhall may use personal data collected from our cookies to identify user behaviour and to serve content and offers based on your profile.

The performance cookies used on this website do not collect personal data.

Other cookies can collect personal data (including information from cookies placed via our advertisements on third party websites):

If we send you a targeted email which includes web beacons, cookies or similar technologies we will know whether you open, read, or delete the message.

When you click a link in a marketing e-mail you receive from Murphy Mulhall we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

## Other Non-Cookie Technologies

Murphy Mulhall also enables the use of technologies that perform functions similar to cookies such as web beacons or other technologies that may be included in marketing e-mail messages or newsletters in order to determine whether messages have been opened and links clicked on. Web beacons do not place information on your device but may work in conjunction with cookies to monitor website activity.

## “Do-Not-Track” Signals

Some web browsers may transmit "do-not-track" signals to the websites with which the browser communicates. As of the Effective Date of this Privacy Policy, an industry standard has not yet been established on how to respond to these signals. Therefore, our website does not currently recognise or respond to these signals, but Murphy Mulhall will reassess its response approach once a standard is established. However, at this time you can generally express your privacy preferences regarding the use of most cookies through your web browser.

## How to Accept or Refuse Cookies

If you do not want to receive cookies from our website, you may set your browser to refuse cookies or to notify you when you receive a cookie, which you may then accept or refuse upon such notice. You can also generally set your browser to turn off cookies. To understand how to do this, please consult your browser's "Tools" section, or any other similar heading.

We recommend that you leave the cookies active. Bear in mind that if you block, turn off or otherwise reject our cookies, some web pages may not display properly, or you will not be able to use any website services that require you to sign in.

## Links to Third Party Websites

This website contains links to third party sites. These links are provided for convenience purposes and are not under the control of Murphy Mulhall. Murphy Mulhall does not make representations and warranties, express or implied, regarding the content of these linked sites. These links do not constitute or imply an endorsement, authorisation, sponsorship or affiliation by Murphy Mulhall with respect to a third party, a third party's web site, the content of a third party's web site, or products or services provided by a third party.

The information practices of those web sites linked to our website is not covered by this Policy. Murphy Mulhall is not responsible for the privacy policies of websites to which it links. If you provide information to such third parties, different rules regarding the collection and use of your personal information may apply. We strongly suggest you review such third party's privacy policies before providing data to them.

## Data Security

We use security safeguards to protect personal data from unauthorised access. We have policies and procedures in place to set forth physical, administrative and technological safeguards around data security. We train our employees in these policies and procedures. In the event of an actual or suspected breach, Murphy Mulhall follows the steps outlined in its Incident Response Plan Policy to respond to same.

- Physical access to Murphy Mulhall's offices and other facilities are security controlled which include locks that are opened using security cards and security card readers that record the identity of employees and visitors entering or leaving the facilities.
- Information systems and communications equipment are placed in secure areas and protected by additional physical security measures that permit access only to the employees who need access, in addition to operational processes, environmental controls and fire detection/suppression systems to safeguard against accidental loss, theft or unauthorised removal, misuse, damage or unauthorised access.
- All gateways to the internet are protected by a firewall and access to both internal and external networks are restricted and controlled.

- Endpoint security is constantly being reviewed to protect the network against unauthorised access, data loss or destruction.
- Access to information is through a secure login process with a unique identifier.
- Key personnel laptops have full disk encryption software. The software is configured with a system lock-out feature enabled after a certain number of incorrect password entries.
- Critical servers are scanned using network and system vulnerability scanners. Web applications are also scanned by automated penetration tools for application level security vulnerabilities that may be susceptible to hacking.
- External vulnerability scanning on our internet facing sites is performed monthly to ensure that these sites are secure. These are done via in-house vulnerability scanning tools and third-party services.
- Penetration tests are performed on our key internet applications prior to production or major upgrades.

## Notices

We reserve the right to modify or change this Privacy Policy at any time. Any such change, update, or modification will be effective immediately upon release, and reflected with the updated effective date and revision number. If we make any changes to our Policy, we will post the updated Policy, provided on an updated homepage link, and may post other places we deem appropriate.

We will provide you with a copy of our Privacy Policy as and when it is updated, as long as you are a current client. This Policy will be mailed to your address of record. If we make any material changes to our Privacy Policy, we will provide our current customers with revised Policy that describe our new policies and procedures that apply to them. This revised Policy will be mailed to your address of record.

## Your Personal Data Rights

Murphy Mulhall offers transparency in the personal data that we collect and maintain, and acknowledges your rights in relation to your personal data.

We provide you with the ability to request access to your personal data records. Whenever we process personal data, we take reasonable steps to ensure that your personal data is kept accurate and up-to date for the purposes for which it was collected. We provide you with the ability to request that your information be rectified or corrected.

We provide you with the ability to object to the processing of your personal data if such processing is not reasonably required for a legitimate business purpose as described in this policy or in our compliance with law. We provide you with the ability to request your personal data be transferred or erased.



In the case of electronic direct marketing, we will provide you with a method to opt out of receiving further marketing materials or with a method to opt in if required by law.

Murphy Mulhall reserves the right to deny a request based on lack of identification or other legitimate reasons. Requests to delete personal data will be subject to any applicable legal and ethical reporting or document filing or retention obligations imposed on us. In addition, the personal data may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

We provide a response to a request within one month; either to fulfil the request, deny the request, explain why we cannot honor the request, or inform you of a necessary extension. Proper identification is required. We reserve the right to charge a fee for excessive requests.

You have the right to lodge a complaint with a supervisory authority.

If you wish to make a request or have any questions, please contact us as noted below in Contact Information.

## Contact Information

You may contact us in either of the following ways:

Email: [info@murphymulhall.ie](mailto:info@murphymulhall.ie)

or write to us at:

Attention: Customer Service

Murphy Mulhall

Garryard House

Earlsfort Terrace

Dublin 2 D02PX51

Tel: +353 1 634 0300

- For service information:
- For information regarding our privacy policy or to make a request related to your Personal Data rights

## Revision History

This policy will be reviewed and revised on a consistent basis to ensure accuracy.

| Revision | Date                | Revised By           | Description                   |
|----------|---------------------|----------------------|-------------------------------|
| 1        | <i>[issue date]</i> | <i>[insert name]</i> | Murphy Mulhall Privacy Policy |
| 2        |                     |                      |                               |
| 3        |                     |                      |                               |

Click [here](#) for prior versions *[or]* Prior versions are available upon request.