

# EFC Privacy Policy

## Privacy Policy

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### 1 IMPORTANT PRIVACY INFORMATION, AND WHO WE ARE

- 1.1 Eugene F Collins is committed to protecting the privacy of our users, clients and staff. This privacy policy ("Privacy Policy") will inform you on how we collect and use your Information (as defined in Section 2.1 below).
- 1.2 This Privacy Policy applies to Information collected by us, or provided by you, over our Website (including any mobile optimised version of our Website accessible from a portable hand-held device) or in any other way (such as over the telephone, by email or in a written communication). Our Privacy Policy will assist you in making informed decisions when using our Website, our products and services. Please take a moment to read and understand the Privacy Policy.
- 1.3 All your personal Information is held and used in accordance with the EU General Data Protection Regulation 2016/679 ("GDPR") and any laws implementing GDPR as well as any other legislation relating to the protection of personal data. If you want to know what information we collect and hold about you, or to exercise any of your rights as set out in section 8 below, please write to us at the below address or via e-mail at [dataprotection@efc.ie](mailto:dataprotection@efc.ie)

**Eugene F Collins, Solicitors**  
**Temple Chambers**  
**3 Burlington Road**  
**Dublin 4**

- 1.4 Eugene F Collins is the controller of your Information for the purposes of the GDPR and is a partnership under Irish Law. Our address is set out at Section 1.3 above. Our telephone number is + 353 1 202 6400.
- 1.5 It is important that the information we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 2 INFORMATION WE COLLECT ABOUT YOU

- 2.1 When you visit our Website (including any mobile optimised version of the Website accessible from a portable hand-held device) or when we interact with you, you may provide us with personal information such as name, email address, mobile phone number and postal address ("Information"). You may provide us with Information in a number of ways:
  - 2.1.1 by supplying us with the Information as listed above on an individual basis or subscribing to receive updates or invitations to events from us.
  - 2.1.2 by corresponding with us by email, in which case we may retain the content of your email messages together with your email address and our responses;
  - 2.1.3 through any preferences and areas of interest as advised by you to us from time to time.

- 2.2 When you visit our Website we may collect data about your computer, including where available your IP address, operating system, browser type and the geographical location of your computer, for system administration purposes.

### 3 HOW WE USE YOUR INFORMATION

- 3.1 We have set out below details of how we use your Information and the lawful basis upon which we do so. Where we rely on our legitimate interests to use your Information we have set out details of what those legitimate interests are. Where we rely on legitimate interests we have carried out a balancing test to ensure that those interests are not overridden by your rights and freedoms.

WHAT WE USE YOUR INFORMATION FOR	LAWFUL BASIS FOR USE	OUR LEGITIMATE INTERESTS
<ul style="list-style-type: none"> <li>To provide you with information you may ask for</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To fulfil enquiries you might make of us</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register for updates or for notification of news on our Website</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To provide you with information that you may request from us</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register for events and seminars that we may be hosting</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To hold events, such as seminars or corporate hospitality to promote our business and its services</li> </ul>
<ul style="list-style-type: none"> <li>To allow you to register as a member of our alumni network</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To operate and develop our alumni network and the activities of our alumni programme</li> </ul>
<ul style="list-style-type: none"> <li>To administer and protect our business and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>To provide efficient client care and services</li> <li>To ensure that our technology operates efficiently and without error</li> <li>To assess which of our services may be of interest to you and to tell you about them</li> </ul>

WHAT WE USE YOUR INFORMATION FOR	LAWFUL BASIS FOR USE	OUR LEGITIMATE INTERESTS
		<ul style="list-style-type: none"> <li>To develop new products and services and improve existing ones</li> </ul>
<ul style="list-style-type: none"> <li>To manage our relationship with you which will include notifying you about changes to our Privacy Policy and our Website terms and conditions</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Contract performance</li> </ul>	<ul style="list-style-type: none"> <li>To provide efficient client care and services</li> <li>To keep you updated about changes in the legal terms that apply to the use of our Website</li> <li>For record keeping and firm management</li> </ul>
<ul style="list-style-type: none"> <li>To manage the systems that contain our marketing database</li> <li>To manage marketing preferences and keep our records up to date</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>For data management for marketing and business development purposes</li> <li>To improve our systems and services</li> <li>To seek feedback</li> <li>To seek your consent when we need it to contact you</li> </ul>
<ul style="list-style-type: none"> <li>To use data analytics to improve our Website, products/services, newsletters, marketing, customer relationships and experiences</li> <li>To identify which articles and newsletters we distribute have been opened and viewed.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests</li> <li>Consent</li> </ul>	<ul style="list-style-type: none"> <li>To improve our marketing strategy and the services that we provide</li> </ul>

#### 4 WHAT INFORMATION DO WE COLLECT IN OUR OFFICE OR ELSEWHERE?

4.1 When you are in our office, we may collect the following Information when you use our Guest Wi-Fi service:

4.1.1 your device name, IP address, duration of use and details of amount of data uploaded and downloaded.

4.1.2 your physical location, whilst you are in the office only

## 5 HOW WE SHARE YOUR INFORMATION

- 5.1 In certain limited circumstances we will share your Information with other parties. Details of those parties are set out below along with the reasons for sharing it.
- 5.1.1 Trusted third parties: In order to provide certain services, we will share your information with third party service providers such as IT infrastructure companies and email logistics providers. We will not share your data with any third party where it is not necessary to do so to provide a service to you.
- 5.1.2 Regulatory and law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

## 6 HOW LONG WE HOLD YOUR INFORMATION

- 6.1 We will only retain your Information for as long as is necessary for the purpose or purposes for which we have collected it. The criteria that we use to determine retention periods will be determined by the nature of the data and the purposes for which it is kept. In certain circumstances, once we have deleted or anonymised your Information, we may need to retain parts of it (for example, your email address), in order to comply with our obligations under GDPR or other legislation.

## 7 YOUR RIGHTS RELATING TO YOUR INFORMATION

- 7.1 You have certain rights in relation to the Information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.
- 7.1.1 Right of Access. You have the right at any time to ask us for a copy of the Information about you that we hold, and to confirm the nature of the Information and how it is used. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your Information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.
- 7.1.2 Right of Correction. If Information we hold about you is not accurate, or is out of date or incomplete, and requires amendment or correction you have a right to have the data rectified, updated or completed. You can let us know by contacting us at the address or email address set out above.
- 7.1.3 Right of Erasure. In certain circumstances, you have the right to request that Information we hold about you is erased e.g. if the Information is no longer necessary for the purposes for which it was collected or processed or our processing of the Information is based on your consent and there are no other legal grounds on which we may process the Information.
- 7.1.4 Right to Object to or Restrict Processing. In certain circumstances, you have the right to object to our processing of your Information by contacting us at the address or email address set out above. For example, if we are processing your Information on the basis of our legitimate interests and there are no compelling legitimate grounds

for our processing which override your rights and interests. You also have the right to object to use of your Information for direct marketing purposes. You may also have the right to restrict our use of your Information, such as in circumstances where you have challenged the accuracy of the Information and during the period where we are verifying its accuracy.

7.1.5 Right of Data Portability. In certain instances, you have a right to receive any Information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that Information to you or directly to a third party organisation.

7.2 You can exercise any of the above rights by contacting us at the address or e-mail address set out in Section 1.3 above. You can exercise your rights free of charge.

7.3 Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

## 8 CONSENT

To the extent that we are processing your Information based on your consent, you have the right to withdraw your consent at any time. You can do this by unsubscribing via the link provided in any direct marketing communication or contacting us at the address or email address set out above.

## 9 COOKIES

### 9.1 What are cookies?

A cookie is a small file of data that may be stored on your browser or the hard drive of your computer.

### 9.2 Cookies on this Website

The cookies we use on our Website are either 'Essential' or 'Performance' Cookies: Essential cookies allow you to navigate around the Website and access its features. Performance cookies enable us to count the number of visitors to our Website and to see how users navigate around the Website when they are using it. All such monitoring is completely anonymous and movements and activity are not traced back to an individual user. We use cookies to try and improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily. In addition, our Website uses Google Analytics to collect information about your online activity on the Website, such as the web pages you visit, the links you click, and the searches you conduct on the Website. Again, we use the information to help us improve the Website and the overall user experience.

For more information about the information gathered using Google Analytics please visit [http://www.google.com/intl/en\\_uk/analytics/privacyoverview.html](http://www.google.com/intl/en_uk/analytics/privacyoverview.html). Details of cookies used on our Website are set out below:

#### **gtag.js and analytics.js – cookie usage**

The analytics.js JavaScript library is part of Universal Analytics and uses *first-party* cookies to:

- Distinguish unique users

- Throttle the request rate
- Throttle the request rate

Cookie Name	Expiration Time	Description
ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named dc_gtm <property-id>.
AMP_TOKEN	30 seconds to 1 year	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.
_gac_<property-id>	90 days	Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out. <a href="#">Learn more</a> .

#### ga.js – cookie usage

The ga.js JavaScript library uses *first-party* cookies to:

- Determine which domain to measure
- Distinguish unique users
- Throttle the request rate
- Remember the number and time of previous visits
- Remember traffic source information
- Determine the start and end of a session
- Remember the value of visitor-level custom variables

Cookie Name	Expiration Time	Description
__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.

__utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
__utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <a href="#">_setCustomVar</a> method with a visitor level custom variable. This cookie was also used for the deprecated <a href="#">_setVar</a> method. The cookie is updated every time data is sent to Google Analytics.

### 9.3 Blocking cookies

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can usually activate these settings by clicking on the 'Help' menu in your browser. However, if you use your browser settings to block all cookies (including Essential cookies) you may not be able to access certain parts of our Website. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>. Unless you have adjusted your browser setting so that it will refuse cookies, you will receive cookies as soon you visit our Website and you will be deemed to have accepted the setting of such cookies.

## 10 CHANGES TO OUR PRIVACY POLICY

This Privacy Policy can be changed by us at any time. If we change our Privacy Policy in the future, we will post the revised version on our Website together with the version number and date of change. You should check this Privacy Policy from time to time when you visit our Website.

## 11 THIRD PARTY LINKS

Our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

## 12 SECURITY

We have put in place appropriate security measures to prevent your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third



parties who have a business need to know. They will only process your information on our instructions and they are subject to a duty of confidentiality.

### 13 INTERNATIONAL TRANSFERS

As a Law Firm we generally hold all information concerning you and your affairs in Ireland and/or within the European Economic Area (“EEA”). Where we are required for any reason to transfer or provide any of your information to a location outside of the EEA, we will ensure that we have a lawful basis to do so and that it is protected to the same standards as if it were being processed within the EEA.

### 14 COMPLAINTS

If you are unhappy about our use of your Information, you can contact us at the address or e-mail address in Section 1.3 above. You are also entitled to lodge a complaint with the Irish Data Protection Commissioner’s Office using any of the below contact methods:

Telephone: +353 (0761) 104 800

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

Post: Office of the Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
Co.Laois  
R32 AP23

For further information on this topic please contact:



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