

TULLOW CREDIT UNION LIMITED

DATA PRIVACY NOTICE

Credit Union Contact Details	
Address	Bridge Street
	Tullow
	Co Carlow
Phone	059 9151542
Email	info@tullowcu.ie

Data Protection Officer Contact Details	
Name/Title	Data Protection Officer
Phone	059 9151542
Email	info@tullowcu.ie
Version 1	May 2018

Tullow Credit Union is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us.

The Principles of Data Protection

When we process your data we must do so in line with the following principles:

Personal data must be;

- Adequate, relevant and limited to what is needed
- Accurate and up to date
- Kept no longer than is necessary.

It must be processed;

- Lawfully, fairly and transparently
- For specific, explicit and legitimate purpose(s)
- In a secure manner.

Introduction

Tullow Credit Union are committed to protecting your privacy. This Privacy Notice (together with our website terms and conditions and Cookies Policy) set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, details how we collect, use, disclose, transfer and store your personal information.

We will always comply with the General Data Protection Regulation ("GDPR") when dealing with your personal data, which comes into effect from 25 May 2018. Further details on the GDPR can be found at Office of the Data Protection Commissioner's dedicated GDPR website (gdprandyou.ie)

For the purposes of the GDPR, we will be the "controller" of all personal data which we hold about you. You can find our contact details at the front of this privacy notice.

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this privacy notice before their personal information is shared with us.

Purpose of Data Collection, Processing or Use

We gather and process your personal information for a variety of reasons and rely on a number of different legal bases to use that information, for example, we use your personal information to process your membership application, to help administer your products and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations.

To comply with a legal obligation

- We are required to process your personal information to comply with certain legal obligations, for example:
- to report and respond to queries raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland and An Garda Síochána;
- to comply with tax regulations that require us to report the tax status of our members;
- to verify the personal information provided to us and meet our legal and compliance obligations, including to prevent money laundering, tax avoidance, financing of terrorism and fraud;
- to perform credit checks in the event you apply for a loan and to supply information to the Central Credit Register and to use the Central Credit Register when considering loan applications to determine your borrowing options and repayment capacity and/ or facilitate other lending institutions to carry out similar checks;
- to cooperate and provide information requested in the context of legal and/or regulatory investigations or proceedings;
- to keep records of communications and member account activities;
- to maintain a register of members of the Credit Union;
- to administer our internal operational requirements (including credit, compliance and risk management, system development, staff training, accounting and for audit purposes);
- to communicate with you through certain mandatory service communications such as providing notice of the AGM; and
- to undertake systems testing, maintenance and development and in order to ensure network and information security.

To enter into and perform a contract with you for the services or products which you require

In order to consider your application for membership of the Credit Union and to process any product/service applications which you may make, we have to gather some personal information.

In order to administer and manage any account you have with the Credit Union, we have to process your personal information. Examples of processing include the administration of accounts, payments, deposits, lending and credit decisions.

To enable the Credit Union to function as a business

In certain circumstances, we process your personal information on the basis of the legitimate interests of the Credit Union. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of the Credit Union and your privacy rights. If you disagree with your information being processed in this manner, you are entitled to exercise your right to object.

Examples of situations in which your personal information is processed based on our legitimate interests, include:

- to collect due and outstanding debt which may involve passing your personal information to debt collection agencies;
- to keep records of communications, including telephone lines, if required in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- to perform research and analysis aimed at improving our products, services and technologies; and
- to establish, exercise and safeguard our rights, including where necessary to take enforcement action and to respond to claims made against the Credit Union.

Where you have provided consent

We use your personal information to make you aware of products and services which may be of interest to you where you have consented to us doing so and in accordance with your preferences. You can at any time withdraw that consent using the contact details below.

In the event that you apply for a loan, we may collect and process information on your health. You will be asked for your consent to process this type of personal information.

What personal information do we collect/use about you?

We may collect, store, and use the following categories of personal data about you:

- Your name, address, date of birth, email, telephone, financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, written correspondence, CCTV footage and telephone voice recordings.

How is the personal information collected?

We collect personal information from a number of sources, including:

- information we receive directly from you or from a person acting on your behalf;
- information we obtain from third parties such as credit reference, debt recovery or fraud prevention agencies, which may have originated from publicly accessible sources.

How do we use personal information for Marketing & Market research?

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may include using the Irish League of Credit Unions and/or specialist market research companies. We will only carry out processing which is based on your consent and will cease processing once you withdraw such consent.

Who do we share your personal data with?

We sometimes share your personal data with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. For example, we may share your personal information with the following third parties:

- our legal and professional advisers;
- any agents or service providers engaged by the Credit Union (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- credit reference, debt recovery or fraud prevention agencies;
- We may also share your personal information with any third parties to whom you have instructed us to share your information with.
- Irish League of Credit Unions
- ILCU re Savings, Loan, Death Benefit Insurance claims
- are required to cooperate by law or otherwise through a legal process with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, an Garda Síochána, the courts, fraud prevention agencies or other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting, CRS and FATCA purposes.
- We may disclose personal information relating to our members to any third party in the event of a transfer or merger (or potential transfer or merger) of the Credit Union.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.

Ensuring our information is up to date and accurate.

We want the service provided by us to meet your expectations at all times. Please help us by telling us straight away if there are any changes to your personal information.

Data Retention Periods

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. Where possible we record how long we will keep your data, where this is not possible, we will explain the criteria for the retention period. This information is documented in our Retention Policy. Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- **Accounting** records required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than six years from the date to which it relates.
- The **money laundering** provisions of Anti-Money Laundering legislation require that certain documents must be retained for a period of five years after the relationship with the member has ended.
- We keep **income tax** records for a period of six years after completion of the transactions to which they relate. Loan application information is retained for a period of six years from the date of discharge, final repayment, transfer of the loan.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one month.
- **Telephone recordings** for one month.

Data Security

Securing your personal data is extremely important to us which is why we take appropriate measures to protect your data. We use a range of technologies and processes to protect your data and we actively monitor emerging cyber threats on a 24/7 basis.

Your Rights in connection with your personal data are to:



To find out whether we hold any of your personal data and **if we do to request access** to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.



Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.



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 exercised your right to object to processing (see below).



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. You also have the right to object where we are processing your personal data for direct marketing purposes.



Request the restriction of processing of your personal data. You can ask us to suspend processing personal data about you, in certain circumstances.



Where we are processing your data based solely on your consent **you have a right to withdraw that consent at any time and free of charge.**



Request that we: a) **provide you with a copy of any relevant personal data in a reusable format**; or b) **request that we transfer your relevant personal data to another controller** where it's technically feasible to do so. 'Relevant personal data is personal data that: *You have provided to us or which is generated by your use of our service. Which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.*

You have a right to complain to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone +353 57 8684800 +353 (0)761 104 800 Lo Call Number 1890 252 231 E-mail info@dataprotection.ie	Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois
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Please note that the above rights are not always absolute and there may be some limitations.

If you want access and or copies of any of your personal data or if you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we send you a copy/a third party a copy your relevant personal data in a reusable format please contact The Data Protection Officer in writing using their contact details above.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. We also reserve the right to refuse to comply with the request in such circumstances.

We may need to verify your identity if we have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Ensuring our information is up to date and accurate

We want the service provided by us to meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal data. If you wish to avail of either of these rights, please contact us at info@tullowcu.ie.