

Website Privacy Policy

Privacy Notice of Crosshaven Carrigaline Credit Union Limited

Our contact details are:

Crosshaven Carrigaline Credit Union Limited, Point Road, Crosshaven, Co Cork, and Old Waterpark, Carrigaline, Co Cork.

Phone: 021-4831441, Email: info@croscarcu.ie

For Data Protection queries contact: The Data Protection Administrator, Point Road, Crosshaven, Co. Cork. Phone: 021-4831441

Crosshaven Carrigaline 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.

Third Party Websites

Our website contains links to other websites. We are not responsible for the privacy practices of these other sites. We encourage you to be aware of this when you visit these sites and to read the privacy statements on other web sites you visit. This Privacy Notice applies solely to our website.

Scope

This Privacy Notice applies to the personal data that we collect about you on our website or mobile application for the purpose of operating the website and providing

- information about your Credit Union
- access to your account details and transactions (Online Banking)
- feedback features
- online membership and loan application facilities
- control over your contact preferences

Acceptance

By using our website or mobile application or by giving us your personal data, you accept the practices described in this Privacy Notice. If you do not agree to this Privacy Notice, please do not use our website or mobile application or give us any of your personal data.

We reserve the right to make changes to this Privacy Notice at any time and we encourage you to review this notice regularly to make sure you are aware of any changes and how your personal data may be used.

Purpose of data Collection, Processing or Use

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted for the purpose of facilitating the above mentioned objectives. This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes and further processing that may be necessary if you apply for a loan with us.

Data gathered from all visitors to our website

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to understand how our website is used by our visitors, for example how often various parts of the site are visited. This information is stored in an anonymous manner and you are not identified by this information.

We also gather the following technical details about visits.

- Your IP address
- Your web browser and operating system
- Date and time you visited various pages on our website

We also store cookies on your computer.

What are Cookies?

Cookies are files which are transferred to your computer's hard disk by a website. Cookies can store information about your preferences and other information which you need when you visit a website. The Credit Union uses cookies to monitor our website traffic, to ensure better service levels and in order to provide you with certain features such as the customised delivery of certain information.

To prevent the use of cookies you should activate the facility which is available in most web browsers that enables a user to deny or accept cookies. Click [here](#) to find out how to enable and deny cookies.

For more information about cookies see www.allaboutcookies.org

What personal data do we use?

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, CCTV footage.

We may also collect, store and use the following “special categories “of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness (See insurance for further details)

We need all the categories of information in the list above to allow us to identify you and contact you and in order that we perform our contract with you. We also need your personal identification data to enable us to comply with legal obligations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Why do we collect your personal data and what do we do with it?

We collect data for the following purposes

- to enable the correct functioning of this website
- to allow us to process queries or feedback that you submit to us
- to process applications for membership, access or credit that you submit to us

All the personal data that you submit is processed in the Credit Union by our staff. However, for the purposes of IT hosting and maintenance, some of this information is located on servers within the European Union.

If you fail to provide personal data

If you fail to provide certain data 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.

The purposes for which we use your personal data

The credit union will use your personal data to assist it in carrying out the following:

- To open and maintain an account for you.
- To meet our obligations under the Credit Union’s Standard Rules.

- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligation for example anti-money laundering obligations.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- In order to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to Irish Credit Bureau and the Central Credit Register.
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.
- We may use credit scoring techniques to either partially or fully assess your application.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and services by way of directly marketing to you.

Can I withdraw my consent at any time?

- Yes. You must be logged in as a Credit Union user in order to manage your consent online. When logged in you may manage your consent by clicking [here](#).
- Alternatively, you may write to us or call Crosshaven Carrigaline Credit Union us the contact details outlined at the beginning of this privacy notice.

How we use particularly sensitive personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. Where it is needed in the public interest, and in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be controllers in their own right. (Note: As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data) We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loans assessment and anti-money laundering purposes and compliance with our legal duties in that regard.

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. We document the reasons for our retention periods and where possible the retention periods themselves in our Retention Policy. Once the retention period has expired, the respective data will be permanently deleted. Please see our retention schedule 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.

- Credit agreements are contracts and as such the credit union retains them for six years from date of expiration or breach, and twelve years where the document is under seal.
- CCTV footage which is used in the normal course of business (i.e. for security purposes) for one month.

Planned data transmission to third countries

There are no plans for data transmission to third countries

Our use and sharing of your information

We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use this information for the following purposes:

- **Fulfilling contract:** This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you
- **Administrative Purposes:** We will use the information provided by you, either contained in this form or any other form or application, for the purpose of assessing this application, processing applications you make and to maintaining and administer any accounts you have with the credit union.
- **Security:** In order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or other personal assets
- **Third parties:** We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with data protection law.
- **Guarantors:** As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that credit union ensures the repayment of your loan. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we will give them details of the outstanding indebtedness. If your circumstances change it may be necessary to contact the guarantor.
- **Irish League of Credit Unions (ILCU) Affiliation:** The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as marketing and public affairs representation, monitoring, financial, compliance, risk, learning and development, and insurance

services to affiliated credit unions. As this credit union is affiliated to the ILCU, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information in your application or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

- **The ILCU Savings Protection Scheme (SPS):** We may disclose information in any application from you or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS. The Privacy Notice of ILCU can be found at www.creditunion.ie
- **Electronic Payments:** For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), the Credit Union is a participant of CUSOP (Payments) DAC (“CUSOP”). CUSOP is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. CUSOP is an outsourced model engaging third party companies, such as a Partner Bank, to assist with the processing of payment data.]
- **Insurance:** As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), Death Benefit Insurance (DBI). To administer these products and services we may pass your details to ECCU Assurance DAC (ECCU). It is a term of your membership, by virtue of our affiliation with the ILCU that we must apply to ECCU for Loan Protection (LP) if you choose to take out a loan with us. If covered, any outstanding sum will be repaid to the credit union by ECCU in the event of your death. In order that we apply for LP it may be necessary to process ‘special category’ data, which includes data about your health. This data will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.
- **Credit Assessment:** When assessing your application for a loan, the credit union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing credit union file
- credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit unions lending policy.

- **Purpose of the loan:** We are obliged to ensure that the purpose of the loan falls into one of our categories of lending
- **Member Service:** We may use information about your account to help us improve our services to you.
- **Legal Duty:** This basis is appropriate when we are processing personal data to comply with an Irish or EU Law.
- **Tax liability:** We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction. Where a member is tax resident in another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions. Under the “Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008” credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.
- **Regulatory and statutory requirements:** To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland, the appropriate Supervisory Authority if required under law.
- **Compliance with our anti-money laundering and combating terrorist financing obligations:** The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under The Money Laundering

provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 , as amended by Part 2 of the Criminal Justice Act 2013 (“the Act”) (and any subsequent aml legislation)

- **Audit:** To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.
- **Nominations:** The Credit Union Act 1997 (as amended) allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. Where a member wishes to make a nomination, the credit union must record personal data of nominees in this event.
- **Incapacity to Act on your account:** The Credit Union Act 1997 (as amended) provides, in the circumstances where you become unable to transact on your account, due to a mental incapability and no person has been legally appointed to administer your account, that the Board may allow payment to another who it deems proper to receive it, where it is just and expedient to do so, in order that the money be applied in your best interests. In order to facilitate this, medical evidence of your incapacity will be required which will include data about your mental health. This information will be treated in the strictest confidentiality.
- **Credit Reporting:** Where a loan is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted in the sum of €500 or more, the credit union is obliged to report both personal details and credit details of the borrower to the CCR.
- **Connected/Related Party Borrowers:** We are obliged further to Central Bank Regulations to identify where borrowers are connected in order to establish whether borrowers pose a single risk. We are also obliged to establish whether a borrower is a related party when lending to them, i.e. whether they are on the Board/Management Team or a member of the Board/Management teams family or a business in which a member of the Board /Management Team has a significant shareholding.
- **Legitimate interests:** A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

- **Credit Assessment and Credit Reference Agencies:** When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar (See legal duty).
- **Our legitimate interest:** The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance. ICB are using **Legitimate Interests (GDPR Article 6 (f))** as the legal basis for processing of your personal and credit information. These Legitimate Interests are promoting greater financial stability by supporting a full and accurate assessment of loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention.
Please review ICB's Fair Processing Notice which is available at [https://www.icb.ie/pdf/Fair Processing Notice.pdf](https://www.icb.ie/pdf/Fair%20Processing%20Notice.pdf). It documents who they are, what they do, details of their Data Protection Officer, how they get the data, why they take it, what personal data they hold, what they do with it, how long they retain it, who they share it with, what entitles them to process the data (legitimate interests), what happens if your data is inaccurate and your rights i.e. right to information, right of access, right to complain, right to object, right to restrict, right to request erasure and right to request correction of your personal data.
- **Debt Collection:** Where you breach the loan agreement we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they make contact with you and details of the indebtedness in order that they recover the outstanding sums.
- **CCTV:** We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security. With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff/Volunteers/members or visitors to the credit union.
- **Art Competition:** This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information and asked for your consent to the processing of

personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Your Rights in connection with your personal data are to:

- **To find out** whether we hold any of your personal data 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 information. 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 information. 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

****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 information, object to the processing of your personal data, or request that we send you or a third party a copy your relevant personal data in a reusable format please contact the Data Protection Officer in writing using the 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 upon such a data access request. 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 information. If you wish to avail of either of these rights, please contact us.