



## Ballinasloe Credit Union (Our Lady of Lourdes) Limited

### General Privacy Notice

*Ballinasloe Credit Union (Our Lady of Lourdes) Limited is fully committed to protecting the privacy and security of your personal data. This privacy notice describes how we collect and use your personal data during and after your relationship with us.*

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 abovementioned objectives. This notice is so that we provide you with information around the use of your data including for lending or lending related purposes.

At Ballinasloe Credit Union (Our Lady of Lourdes) Limited we understand and recognise the importance of maintaining and protecting your privacy rights and are fully committed to our legal obligations under the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988 - 2018. For account related purposes, you are required to provide us with certain personal data (information). This may include special category or sensitive personal data.

Please feel free to contact our Privacy Officer should you require further details about how or why we process your personal data.

Ballinasloe Credit Union (Our Lady of Lourdes) Limited, Main street, Ballinasloe, Co. Galway H53VK18

Phone: 090 - 9643179

Email: [GPPR@ballinasloecreditunion.ie](mailto:GPPR@ballinasloecreditunion.ie)

Website: [www.ballinasloecreditunion.ie](http://www.ballinasloecreditunion.ie)

We process your personal data for a number of reasons and rely on a number of legal bases to use your personal information. This Privacy Notice will provide you with information and details regarding the processing of your personal information.

#### **The purposes for which we use your personal data:**

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

- To identify you and verify the information provided by you in your application for membership or application for a loan.
- To open, maintain and administer an account(s) for you.
- To process, administer and maintain membership of an account for a child (*under 16*).
- To contact you about your account, to perform our contract(s) with you and to respond to requests you may make to us.
- To facilitate and administer credit union products and services you have requested from us.
- To provide updates on our loan products and services by way of directly marketing to you (with your consent)
- To comply with Central Bank Regulations, to determine whether you are a connected borrower or related party borrower and to comply with our legal obligations for example, Anti-Money Laundering legislation.
- To monitor and analyse transactions in order to detect and prevent fraud and cyber-attacks.
- To meet our legal and compliance obligations under the Credit Union's Standard Rules, to purchase loan protection and life savings protection from ECCU and when acting as an insurance intermediary.
- To conduct credit searches with the Irish Credit Bureau and make submissions to the Central Credit Register.
- To assess your loan application and determine your creditworthiness for a loan.

- To use credit scoring techniques and other automated decision-making systems to either partially or fully assess your loan application and determine your creditworthiness.
- To administer your loan and where necessary, take steps to recover the loan and enforce any security taken as part of the loan.
- Where you have been nominated by a member of Ballinasloe Credit Union (Our Lady of Lourdes) Limited to receive the property of the credit union account of that member

We may need some or all of the above-mentioned categories of information. We may also collect, store and use “special categories” of more sensitive personal data.

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 data.

### What personal data to we use?

We may collect, retain, store and use the following categories of personal information about you, depending on the products/services we provide to you.

| Information Type  | Example of how we use it   |
|---|--|
| Name, address, Eircode, date of birth, telephone number, email, proof of identity, photographic identification/passport details, proof of address documents, proof of PPSN documents, signatures, residency, nationality, account number and membership of other credit unions.   | We use this information to verify your identity, to send you information and process application(s) for membership, products or services. We use it to respond to your queries, to send you AGM notices, to comply with our legal obligations and regulatory requirements.   |
| Tax Identification Number/PPS, criminal sanctions accommodation status, mortgage details, previous addresses, college address ( <i>where applicable</i> ), previous names, spouse, partners, details of credit union products you hold with us, source of funds, expected turnover, purpose of account, beneficial owner of account.  | We use this information to process application(s) for membership, products or services, to respond to your queries, to comply with regulatory requirements and legal obligations including our obligations under anti-money laundering legislation.  |
| Financial data, status and history, account transaction data, account balance, contract data, payments information debit/credit transactions you make with us, occupation, employment status, dependents, outgoing, credit history, salary, other income, other financial commitments, source of wealth source of funds, Information relating to real or personal property, relationship with joint borrower, business ownership, directorships held, retirement age, first time buyer and pension details, | We use this information to assess application(s) for products or services, to process your transactions with us, to monitor and analyse transactions and financial behaviour, to comply with our legal obligations, to detect and prevent financial crime and cyber-attack. We share information with third parties to prevent financial crime, report fraud and manage risks. |
| Information about your health, including any medical condition, health and sickness (see insurance for further details).  | Where you have consented, we use this information to assess insurance coverage relating to products or services.   |
| Information obtained from other parties such as credit reference agencies, the Central Credit Register, other joint account holders and guarantors’ details.  | We use this information to assess your application(s) for products and services, to comply with our reporting obligations, and for loan related purposes.  |
| Tax residency, politically exposed person status (PEP), beneficial owner of account, Information concerning marital and family status, partner and dependent details.   | We use this information to facilitate and process applications for products and services and to comply with our legal obligations and regulatory requirements.   |
| Nominations, power of attorney arrangement details, authorised signatures and spouse/ partner details.  | We use this information to provide you with credit union services and to facilitate the administration of your account.  |

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|--|---|
| Guarantors personal details and financial information, other category information with regard to guarantors where required.  | We use this information to facilitate the requirements of the loan contract, to ensure repayment of the loan, other category information may also be collected from guarantors as part of the credit checking process. We may contact the Guarantor in respect of the guarantee in the event of the change of circumstances and the member(s) getting into arrears. |
| Connected Borrowers/Related Party Borrowers.   | We use this information to ensure we comply with our legal obligations. We are obliged to establish related party borrowers. We are obliged to identify where borrowers are connected in order to establish whether the borrower will pose a single risk.   |
| Interactions with credit union staff and officers on the premises, emails, telephone messages and telephone call recordings. | We use this information to keep a record of your interactions with us, respond to your queries and for training and quality purposes.   |
| For minors; Parental consent/Guardians' consent, Proof of age document/ Birth certificate.                                   | We use this information to comply with our statutory obligations when we process membership or provide services for minors and to facilitate entry for minors into credit union competitions.   |
| Images from CCTV footage in and around the credit union premises.  | We use CCTV for security purposes, and to assist in the prevention and detection of crime.  |

### How we use special category or particularly sensitive personal data

Special category data may include information about your personal health, medical condition or illness. We will require a further legal basis to justify processing, using and retaining special category data. Where necessary we may process special category data in the following circumstances;

1. Where you have given explicit written consent for a specific purpose.
2. Where we are required to carry out our legal obligations as specifically provided for by National Law and or European Union Law (*where applicable*), and in line with our data protection policy.
3. Where processing is necessary for reasons of substantial public interest as authorised by National or European Union Law, and in line with our data protection policy.
4. Where we are required to process it for purpose of insurance on a loan

Less commonly, we may process this type of information where it is necessary in relation to a legal claim(s) or where it is necessary to protect your vital interests (or the vital interests of another person) and you are not capable of giving your consent, or where you have already made public, the special category information we process about you.

### How we keep your personal data safe:

We use a variety of technical controls and organisational security measures to protect your personal data from unauthorised access or misuse including identification and authentication control mechanisms, firewalls, password security measures, intrusion detection systems, strong security facilities and systems.

### 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 legal basis is appropriate when processing is necessary to facilitate, administer & manage your account(s), loans, credit union services and products you have with us or have requested from us;**

**Administrative Purposes:** We will use the information provided by you, contained in this application form or any other form or application, for the purpose of and to facilitate processing your membership with us. We will use it to maintain and administer any account(s) you have or may have with us, to process applications for products and services you have or request from us. We will use it to process and facilitate your entry for the members car draw and to assess and facilitate any loan application(s) you make or request from us.

**Security:** If you apply for a loan with us in order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your house, property or other personal assets.

**Third parties:** If you apply for a loan with us, we may transfer the personal data we collect about you to Australia to perform our contract with you. However, to ensure that your personal data receives an adequate level of protection, to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, any transfer shall be made in accordance with EU approved model clauses (controller to processor).

**Guarantors:** If you make a loan application with us, we may make the requirement for the appointment of a guarantor a condition of your loan agreement. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we must give them details of the outstanding indebtedness. If your circumstances change it may be necessary to contact the guarantor.

**Change in personal circumstances:** You agree to notify us without delay in the event of any change in your personal circumstances, to enable us to comply with our obligations to keep information up to date.

**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, we must 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 commencement of your original membership to authorised officers or authorised employees of the ILCU for the purpose of the ILCU providing these services to us.

**The ILCU Savings Protection Scheme (SPS):** The Savings Protection Scheme (SPS) is a discretionary scheme funded by credit unions affiliated to the ILCU. The scheme is operated by the ILCU and may intervene to provide support to an affiliated credit union which finds itself in difficulty. We may disclose information in any application from you or in respect of any account or transaction of yours from the date of the commencement of your original membership to authorised officers of the ILCU for the purpose of and to facilitate 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](http://www.creditunion.ie)

**Electronic Payments:** Ballinasloe Credit Union (Our Lady of Lourdes) Limited is a participant of CUSOP (Payments) DAC ("CUSOP"). CUSOP is a credit union owned, independent, not-for-profit company regulated by the Central bank of Ireland that provides an electronic payments service platform for the credit union movement in Ireland. This service enables us to provide and process electronic payments on your account (such as credit transfers, standing orders and direct debits), CUSOP is an outsourced model engaging third party companies, such as a Partner Bank, to assist with the processing of payment data.

**Member Personal Current Account Services (MPCAS):** Companies or financial institutions that assist us to provide Member Personal Current Account Services (MPCAS) and debit card services. If we issue you a debit card, Railsbank Technology Limited (which is an Open Banking Platform) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their privacy policy which is available at <https://www.railsbank.com/privacypolicy>

**Insurance - Life Savings/Loan Protection:** 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), and optional related riders (where applicable).

If you choose to take out a loan with us, it is a condition of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with ECCU to allow it to deal with insurance underwriting, administration and claims on behalf of Ballinasloe Credit Union (Our Lady of Lourdes) Limited.

**Credit Assessment:** If you apply for a loan with us the credit union will take all relevant factors into account and will utilise all information provided or contained in:

- your application form including your loan supporting documentation.
- Your existing credit union file and account history.

- information provided from judgement searches and credit reference agencies including the Irish Credit Bureau and the Central Credit Register.

We utilise all available information including judgement searches to assess your loan application in line with applicable regulations and legislation including the credit union lending policy.

**Member Service:** We may use information about your account and interactions with us to help us improve our member services to you.

### Legal Duty

**This basis is appropriate when we are processing personal data to comply with Irish or EU Law**

**Regulatory and statutory requirements:-** To meet our obligations under the Credit Union Act 1997(as amended) and other financial services legislation and codes of practice and to comply with our legal obligations to the Financial Regulator and The Central Bank of Ireland, there may be times where we are obliged to allow authorised persons access our records for reporting, compliance and auditing purposes. These records may contain personal information about you, we may also share your personal data with certain government and statutory bodies such as the Department of Finance, the Department of Employment Affairs and Social Protection, The Financial Services and Pensions Ombudsman Bureau of Ireland, An Garda Síochána and other Regulatory and Statutory authorities where we are required to do so by law.

**Compliance with our Anti-Money Laundering and Countering the Financing of Terrorism obligations:** To meet our statutory duties and obligations, personal and financial information provided by you will be used to comply with our customer due diligence and screening obligations under Anti-Money Laundering and Countering the Financing of Terrorism 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”).

**PEP:** The Money Laundering and Terrorist Financing Act 2010, as amended by Part 2 of the Criminal Justice Act 2013 (“the Act”) places legal obligations on Financial Institutions including Credit Unions to take steps to determine whether or not a member or a beneficial owner connected with a member; is a Politically Exposed Person (PEP) or an immediate family member or a close associate of a Politically Exposed Person. We are obliged by law to record and retain Politically Exposed Person details.

**Credit Reporting:** If you apply for a loan in the amount of €2,000 or more (*two thousand euro or more*), we are obliged to make enquiries from the Central Credit Register (CCR) in respect of your credit history. Where you are approved and granted a loan in the amount of €500 or more, (*five hundred euro or more*) we are obliged to report both your personal details and your credit details to the Central Credit Register (CCR).

**Purpose of the loan:** If you apply for a loan with us, we are obliged to ensure that the purpose for your loan or any loan approved by us falls into one of our approved categories of lending.

**House Loan:** Where you obtain a house loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf.

**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. When lending we must also establish whether a borrower is a related party, whether the borrower is; on the Board/Management Team, or a family member of a person on the Board/Management Team, or a member of a business in which a member of the Board/Management Team has a significant interest and/or shareholding.

**Tax Liability:** Financial institutions including credit unions that operate in a jurisdiction who have signed up to the Common Reporting Standard (CRS) are obliged to collect and report certain information to their tax authority as provided for by Section 819F of the Tax Consolidation Act 1997. If a member of the credit union is a non-resident in this jurisdiction, we are obliged to share this personal information and documentation with the Revenue Commissioners. We may retain this information about you when you are no longer a member for compliance purposes but only in accordance with the applicable data retention period.

**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 is obliged to record and retain personal data of nominees as appointed by the member in this event.

**Audit:** To comply with our legislative and regulatory duties and obligations, we must maintain audited financial accounts. For auditing and accounting purposes, we must allow the appointed internal and external auditors to see our records, some of which may contain your personal information.

### Legitimate Interest

**A legitimate interest may include a business or commercial reason to use your information. Where we rely on this provision, we must tell you what our legitimate interests are, however they must never override your interests or your fundamental rights and freedoms.**

#### **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.

**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. We must assist in the prevention of fraud and comply with our legal obligations including our obligations under the Irish League of Credit Unions.

The Irish Credit Bureau(ICB) are using Legitimate Interests ([GDPR Article 6 \(f\)](#)) as the legal basis for processing your personal and credit information. These Legitimate Interests are promoting greater financial stability by supporting a full and accurate assessment of loan application(s), 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 the ICB Fair Processing Notice which is available at <http://www.icb.ie/pdf/Fair Processing Notice.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 and 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 your loan agreement we may use or avail of the services of a solicitor(s), debt collection agency, or other approved third-party service providers for the purpose of recovering the outstanding debt. We will pass them details of the loan in order that they make contact with you and the details of the indebtedness in order that they recover the outstanding sums.

**Our legitimate interest:** The credit union will take appropriate steps to protect the assets and equity of the credit union and its members. We will ensure that outstanding debts are recovered to maintain financial and organisational stability and to provide the credit union with an effective and consistent debt recovery remedy.

**Judgements Searches:** We carry out searches for judgements and credit checks to assess your credit worthiness and to assist our decision making when assessing loan applications.

**Our legitimate interest:** To ensure that the credit union for its own benefit and therefore the benefit of its members engage in responsible and prudent lending practices. To facilitate a case by case approach to our lending and to provide a complete financial position to facilitate proper evaluation of your ability to repay the loan.

**CCTV:** We have CCTV footage installed on the premises with clearly marked signage for the purpose of organisational and public security and safety.

**Our legitimate interest:** To secure and monitor our property and offices to protect our staff, volunteers, members & visitors. To assist in the prosecution of offenders, for the purpose of crime/fraud prevention and detection, to identify accidents and incidents and to assist in the resolution of disputes in relation to over the counter financial transactions.

**Email:** We use email to send, transmit and receive general information, personal information, financial information, special category data or sensitive category personal data.

**Our Legitimate Interest:** To provide the credit union and our members with a safe, secure, reliable and effective transmission and communication facility for general, personal, financial, sensitive and special category data.

**Voice messages and call recordings:** we provide a telephone answering service when our offices are closed or when all our telephone operator lines are busy. We may record incoming and outgoing calls for training and quality purposes

**Our legitimate Interest:** To ensure a good quality of service, to assist in training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes.

**Winners Details:** Where you are a winner in our car draw, we publish your details which may include a photograph of the winner's presentation on our website, Facebook page, credit union newsletter and other media outlets.

**Our legitimate Interest:** To inform our members of the winning results, to ensure the draw results are open and transparent. To ensure the continuing integrity of the members car draw by making public the winning results.

### Consent

**We will rely on this legal basis where you have consented to us processing your personal data, we will stop processing your personal data once you inform us that you are withdrawing your consent.**

**Marketing, Market Research & Notifications:** To help us improve and measure the quality of our products and services for our members we undertake market research. This may include using the Irish League of Credit Unions and/or specialist market research companies. In addition, we may wish to contact our members and inform them of new products, further services, loans or promotional notices that may be of interest. You will be afforded the opportunity to decide on whether to participate or not and on your marketing preferences when completing an application for a mortgage or loan with the credit union. Under the General Data Protection Regulation (GDPR) we must have your consent to contact you or send you marketing material or promotional notices. Should you wish to receive such notifications you will be required to complete the "Consent to Marketing" form available at our offices, we will stop processing your personal data once you inform us that you wish to withdraw your consent to marketing.

**Art Competition:** This credit union is involved in 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 18, then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

**Schools Quiz:** This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools Quiz is open to entrants aged 4 to 13. Upon entry parent/legal guardians will be given further information and asked for their consent to the processing of their child's personal data. This information is processed only where consent has been given. A separate privacy notice is included in all School Quiz entry forms.

### Personal Data Retention

We must retain certain personal data to facilitate administrative functions, to facilitate and maintain proper records and to comply with our legal duties and obligations. We only retain personal data for the minimum time necessary to facilitate the purpose for which the data was obtained and to comply with our legal and contractual obligations. We retain members personal data for seven years from date of end of relationship. We retain loan application data including guarantor's data for seven years from date of discharge, final repayment or end of relationship. We retain CCTV footage for one month and our voice messages are deleted when the message has been received and or addressed. We retain our recorded phone calls for six months. Provisions of Anti-Money Laundering legislation require that certain documents must be retained for a minimum period of five years and we are obliged to retain tax residency information (CRS) for a period of seven years. Where no retention periods are provided for by law, we adopt a policy of minimum data retention (we will only keep your personal data for the minimum time necessary). Credit agreements are contracts and as such the credit union retains them for 7 years from date of expiration or breach, and 12 years where the document is under seal. Loan applications form part of your credit agreement and as such we retain them for 7 years. When the relevant data retention period has expired, unless exceptional circumstances exist to justify extending the retention period (such as a legal requirement), your personal data will be permanently deleted, destroyed and /or anonymised in accordance with our Data Retention policy.

#### 1. Sharing Your Personal Data:

Where you have given your explicit consent and authorisation, we may share your personal data with your authorised personal representative(s) for the purpose of administering your account(s). We may share your personal data with national regulatory and law enforcement authorities but only where we have a legal obligation to do so.

#### 2. Sharing Personal Data of Others:

Where you disclose personal data/personal information about another person for the purpose of facilitating your application for

membership and or to administer your account(s), please ensure that you have obtained their consent to share their personal data with Ballinasloe Credit Union (Our Lady of Lourdes) Limited.

### **3. How secure is my information with third party service providers?**

We may require third party service providers to process your personal data on our behalf for operational functions and support services. 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<sup>1</sup>. 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 must operate strictly in accordance with all legal duties and with respect for the security of your personal data at all times.

### **4. Data transmission to third countries:**

We may transfer the personal data we collect about you to Australia to perform our contract with you. However, to ensure that your personal data does receive an adequate level of protection, to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, any transfer shall be made in accordance with EU approved model clauses (controller to processor).

### **5. Profiling:**

At times we may use technology systems to assist us in decision making based on the personal data we have (or are allowed to collect from others) about you. We may use such systems for the purpose of assessing loan applications and to comply with our legal duties and obligations including anti-money laundering and compliance legislation.

### **6. Third Parties**

The credit union utilises a third-party Outsourced Service Provider 'Link ASI Limited' who carry on the business of, inter alia, servicing, administering and managing mortgage loans secured on residential properties in Ireland. This business will support the credit union in the processing, fulfilment and special servicing (arrear management) of residential mortgages based on a standardised consistent and reliable methodology and is therefore of ultimate benefit to its member.

The credit union utilises a third-party valuation management solutions company 'VMS' who provide, inter alia, valuation management services on residential properties in Ireland. This service will ensure that valuations are carried out by professional valuers and that the valuations follow mandatory valuation standards and is therefore of ultimate benefit to its members

The credit union may utilise a third-party storage solution company to ensure safe, secure storage of Title Deeds and security documents and is therefore of ultimate benefit to its members.

The credit union provides your information to insurance companies for the purpose of insuring the loan.

### **7. Joint Loan Accounts/Group Loan Accounts:**

Where you hold, open or operate a joint account and or a group loan account, it may result in your personal data being shared with the other joint loan account holder or group loan account holders. Where a joint loan account holder or group loan account holder, where permitted, explicitly authorise a third party to administer the loan account on their behalf, it may cause your personal data to be shared with that third party.

### **8. Change of purpose:**

We will only use your data for the purpose for which it was provided to us and in ways compatible with that purpose. If we need to use your personal data for a different purpose, we will contact you and seek your consent. Where we are permitted to change the purpose for processing your personal data, we will immediately notify you and explain the legal basis which allows us to change the purpose of such processing. You agree to notify your credit union without delay in the event of any change in your personal circumstances, to enable your credit union to comply with its obligations to keep information up to date.

### **9. If you fail to provide personal data:**

If you fail to provide or facilitate us with relevant personal information when requested, it may not be possible for us to process your application for membership or the membership of a minor. We may not be able to perform the contract we entered into with you or agreed to enter into with you. It may not be possible to administer your account(s), we may be prevented from complying with our legal obligations or we may be obliged by law to cease providing our services to you.

### **10. Our use and sharing of your information:**

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<sup>1</sup> 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.



In order to comply with the provisions of the General Data Protection (GDPR) we must have a legal basis for processing your personal data. There may be times where the legal basis we rely on will overlap and there may be several legal bases which justify our processing of your personal data.

## Your rights in connection with your personal data



**You have the right to find out.** whether we hold any of your personal data and if we do, to request access to that data. You are entitled to request further information about the processing of your personal data including the following; The right to know who we are, our address, our contact details and the contact details of our Data Protection Practitioner and the purpose for processing your personal data.



**Informed:** You have the right to be informed if you are obliged to provide your personal data due to a legal or contractual requirement and the consequences for failing to provide your personal data. You have the right to know the recipients or categories of recipients of your personal data. Where we intend to further process your personal data or process your personal data for an additional purpose you have the right to be informed of the purpose(s) of the further processing.



**Request Rectification** You have the right to request rectification or correction of personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.



**You Have the right to know the legal basis** that we rely on for processing your personal data. There are Six legal bases that we may rely on to process your personal data; Consent, Contract, Legal Obligation, Legitimate Interest, Protection of Vital Interest, Performance of a Public Task. Where we rely on legitimate interest as our legal basis for processing your data, you have the right to know what the legitimate interests are.



**You have the right to 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 must give a specific reason why you are objecting based on your particular situation. You have the right to object to the processing of your personal data for direct marketing purposes at any time.



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



**Automated decisions;** You have the right to know if we use automated decision-making systems including profiling. Where we use such systems, you have the right to information about how such decisions are made, including the consequences of such processing for you.



**Data Portability:** You have the right to 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.



**Subject Access Requests:** Where you request a copy of your personal data, we must respond to you in a timely manner. If we are unable to deal with your request within a calendar month, we may extend the period of time to respond by a further two calendar months. We will however outline to you the reason we require an extension of time. You have the right to 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.



**Withdraw Consent:** Where we are processing your personal data based solely on your consent, you have the right to withdraw that consent at any time and free of charge. You have the absolute right to withdraw your consent to the use of your personal data for direct marketing purposes.



**Retention:** You have the right to know the period of time for which your personal data will be retained and stored. If it is not possible to give you this information, you have the right to be informed of the criteria that we use to determine the retention period.



**Please note that some of the above rights are not always absolute and may be subject to limitation**



**You have the absolute right to lodge a complaint** with the Data Protection Commission if you are unhappy with any of our processing activities by:

**POST: Data Protection Commission, Canal House, Station Road, Portarlington R32 AP23 Co.Laois**

**Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2 D02 RD28.**

**PHONE: 057 8684800 / 0761 104 800 LO CALL: 1890 252 231**

**EMAIL: [info@dataprotection.ie](mailto:info@dataprotection.ie)**



If you wish to access or obtain copies of your personal data, or wish to review, verify, correct or request erasure of your personal data, or to object to the processing of your personal data, or request that we send a copy of your relevant personal data to you or a third party in a reusable format, please contact our Data Officer in writing.

Ballinasloe Credit Union (Our Lady of Lourdes) Limited, Main street, Ballinasloe, Co. Galway

Phone: 090 - 9643179 Email: [GDPR@ballinasloecreditunion.ie](mailto:GDPR@ballinasloecreditunion.ie) Website: [www.ballinasloecreditunion.ie](http://www.ballinasloecreditunion.ie)

**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.

**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 want the service provided by us to meet your expectations at all times. Please let us know if there are any changes to your personal data so we can update our records. Where we have reason to update our General Privacy Notice we will provide notification on our website.: [www.ballinasloecreditunion.ie](http://www.ballinasloecreditunion.ie).