

Privacy Notice of Limerick & District Credit Union Limited

Our contact details are:

Address: Credit Union House, Redgate, Caherdavin, Limerick V94 D362

Website; www.mylimerickcu.ie

Email: info@lcu.ie

Phone: 061-455831

The Data Protection Officer for Limerick & District Credit Union Ltd can be contacted on 061-455831 or by email at dpo@lcu.ie or at the above address.

Limerick & District Credit Union Limited (“we” or “us”) 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.

Please take time to read this notice carefully. If you are under 18 years of age, please read this summary with a parent or guardian and ensure you understand it. If you have any questions about how we use your information please contact our Data Protection Officer at the details above.

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 solely for the purpose of carrying out the abovementioned objectives.

What personal data do we use?

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

- Your name, address, date of birth, email, telephone number(s), financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, income details, outgoings details, accommodation status, source of wealth, source of funds, Politically Exposed Status, mortgage details, bank account details, previous addresses, spouse details, partners details, dependents details, nominations, Tax Identification/PPSN numbers, passport details, driving licence details, tax residency, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings, information about you provided by others (e.g. joint account applications/nominations), online identifiers (cookies)

Sometimes we may use your information even though you are not our customer. For example, you may be a beneficiary, guarantor, director or representative of a customer of ours or be a potential customer applying for one of our products or services.

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.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union, the Credit Union

Act, 1997 (as amended) and Central Bank Regulations.

- 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.
- Administering any applications for services or products you may make and to ensure the provision of that service or product to you
- 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 [and other automated decision making systems] 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.
- When acting as an insurance intermediary, to meet our obligations.
- In certain instances a member may authorise a third party to withdraw from their account on their behalf. A Third Party Withdrawal Authority will be completed by both the authorising member and the authorised third party. The authorised third party will sign a consent to the use of their personal data for the purposes of the authorisation.

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

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.

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information 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. See **Insurance** for further details.

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 right¹. 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.

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.

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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Registering online

We offer our members an online service, this service is optional. We collect some additional information about you when you register your account online. Prior to registering your account, we advise you to read our Website Terms and Conditions, our Cookie Policy and our Privacy policy. The additional data we will need to collect include a username, email address and contact number. Our legal basis for doing this is legitimate interest, findings from research indicated a demand for such a service and it contributes to the business continuity of the credit union.

All information you provide to us through CU Online is stored on secure servers. Any payment transactions undertaken by CU Online are encrypted with TLS technology. Most of the information you submit to CU Online is already held by the credit union with the exception of your unique user name and security questions and answers. Your password and PIN are not available to the credit union or the service provider.

The use of the Internet, by its nature, is not always secure. As a result, while we have reasonable IT security measures in place, we cannot guarantee the security or privacy of communications made over the internet including any related to CU Online, the Online Services or your Online Account. For this reason, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk.

You are responsible for providing all you require to safely and properly access and use CU Online and the Online Services including a computer, an internet connection and security software.

Profiling

We sometimes use systems to make decisions based on personal information we have (or are allowed to collect from others) about you. This information is used for loans assessment, profiling and anti-money laundering purposes and compliance with our legal duties in that regard. We also carry out profiling in order to tailor our marketing to you by profiling members according to categories such as age, loan history, savings, life cycle and date of account opening.

Data Retention Periods

We will only retain your personal information for as long as necessary to fulfil the purpose(s) for which it was obtained,

¹ 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.

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 and securely 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.
- Credit agreements are **contracts and as such the Credit Union** retains for a period of seven years from the date of discharge, final repayment or transfer of your spouse/partner's loan., and twelve years where the document is under seal.
- Loan application information is maintained for a period of 7 years from the date of discharge.
- Forms and records will be retained in individual member files for 7 years after the relationship with the member has ended
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one month.
- **Telephone recording** will be retained for three months

Planned data transmission to third countries

There are no plans for a data transmission to third countries.

Updates to this notice

Update to Privacy Notice

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website at www.mylimerickcu.ie or you can ask us for a copy.

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:

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.

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 do so with respect for the security of your data and will be protected in line with data protection law.

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

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.

E- Signatures:

Our E-signature service to complete loan documents is available through the on-line computerised system, CU Online+, which is part of our main IT service provider Wellington IT. If you use our E-signature service to complete loan documents through the on-line computerised system, that may result in DocuSign Inc. coming into possession of personal data attributable to yourself. Where any such personal data is contained in a loan document which you have signed using an E-signature generated for you by DocuSign, it is intended that such document will have either been purged or redacted by DocuSign within a short time period after you have so signed the document.

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), and optional related riders (where applicable).

If you choose to take out a loan with us, it is a term 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 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.

Customer Service: To help us improve our service to you, we may use information about your account to help us improve our customer service.

Security: In order to secure payment of a loan it may be necessary to obtain security such as a charge on your property or other personal assets

Guarantors: We may make a requirement for a guarantor as part of your loan conditions to ensure the repayment of the loan. Should the 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.

Foreign Exchange: If you use our foreign exchange services, we are required to share some of your personal data with our foreign exchange services provider FEXCO.

ATM/Debit or Charge Card: If you have a debit, or prepaid card with us, we will share transaction details with companies which help us to provide this service. **Please note that this service is not currently in use in Limerick and District Credit Union.**

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 and the Foreign Accounts Tax Compliance Act.. 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.

Purpose of the loan: We are obliged to ensure that the purpose of the loan falls into one of our categories of lending

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 information with certain statutory bodies such as the Department of Finance, the Department of Social Protection, the Financial Services and Pensions Ombudsman Bureau of Ireland and the Data Protection commissioner if required by law.

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you in this membership application 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 the Criminal Justice Act 2018

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an internal and external 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 [and guarantor shortly] to the CCR.

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. 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.

<p style="text-align: center;">Legitimate interests</p> <p>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.</p>	
<p>Credit Assessment and Credit Reference Agencies:</p> <p>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].</p> <p><i>Our legitimate interest:</i> 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.</p> <p>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.</p> <p>Please review ICB's 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, 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 information.</p>	
<p>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. We may use a private investigator in order to locate you in the event that you fail to make repayments on your loan and or fail to make contact with the credit union.</p>	<p>Our legitimate interest: The credit union, where appropriate will necessary take steps to recover a debt to protect the assets and equity of the credit union</p>
<p>Judgements Searches: We may carry out searches in Stubbs Gazette and/or Vision-net in order to assess your credit worthiness to repay a loan.</p>	<p>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. In carrying out such a search we can better determine your overall financial position in order to lend to you.</p>
<p>CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security, for the prevention of theft, pilferage, and for the security of credit union staff, officers, members, visitors, contractors and credit union property and for ensuring compliance with procedures and for the monitoring of staff performance and for the identification of possible</p>	<p>Our legitimate interest: 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.</p>

or actual cash overages or shortages by staff and in respect of misconduct issues	
Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, clarification of instructions and quality of service.	Our Legitimate interest: To ensure a good quality of service, to assist with training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes.
Marketing in/with the AGM Booklet: We may include marketing in or with the AGM Booklet that we issue to all our adult members. We do this to promote the Credit Union among its members and to grow our loan book.	Our Legitimate Interest: To grow our loan book by raising awareness of the products and services that are available to our members.
Your consent	
Marketing and 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/ specialist market research companies. See Appendix 1 on Your Marketing Preferences.	
Cookies By continuing to use Limerick and District Credit Unions website and by not changing your web browser settings to disable cookies, you consent to the use of cookies. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to help us provide a better service, to record session information and/or to assist you in browsing the website. This may in some instances only be statistical data about how you browse our website. For more information on Cookies please see our Cookies Policy on our website.	
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 18 then we ask that the parent/legal guardian provide the appropriate consent.	
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. Where the person providing consent is below 18 then we ask that the parent/legal guardian provide the appropriate consent.	
Transferring to another Credit Union Limerick and District Credit Union may assist you in transferring your account to another Credit Union. If you request us to do this, we will require your consent to transfer your personal data to the other credit union. For this transfer to take place you will usually be required to open an account in the other Credit Union first, we will then transfer your account history to the relevant credit union on your behalf.	

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

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 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 the contact details set out above.

Updates

We will update our Data Privacy Notice from time to time. Any updates will be made available and, where appropriate, notified to you by SMS, email or via our website.

Your Marketing Preferences

As part of improving our service to you, from time to time, we would like to inform you of goods, services, competitions and/or promotional offers available from us. We may wish to use different means when sending such marketing communications. Please now indicate by which methods you consent to being contacted, **if any**, by ticking **Yes** to each method of communication below

	Yes
Post	<input type="checkbox"/>
Email	<input type="checkbox"/>
Text	<input type="checkbox"/>
Landline call	<input type="checkbox"/>
Mobile call	<input type="checkbox"/>

Signature of applicant(s):	
Print Name:	
Date:	DD MM YYYY
Address:	
Account Number:	

You have a right to notify us free of charge at any time of your right to refuse such marketing by writing to The Marketing Officer, Limerick & District Credit Union Ltd, Redgate, Caherdavin, Limerick or by email to marketing@lcu.ie or by using the "opt-out" options in any marketing message we send you.

Please contact us directly should you wish to change or withdraw your consent.

Quality Control/Verification Process

Our Internal Audit, Risk and Compliance functions may, occasionally, contact you, by telephone or by post, to verify transactions as part of their normal audit work with the Credit Union. Please note that apart from being asked to verify your name you will not be asked to disclose any other personal information.

Loan Administration/Credit Control

Please note that we maintain the right to contact members by such means as best available to us in relation to a non-performing loan or outstanding debt to the credit union, including by text or email.

Receipt of obligatory notices by email

(This service is not yet available in Limerick & District Credit Union Ltd but it is expected to be available by AGM 2020)

There are certain notices that credit unions are obliged to provide from time to time. Please provide your email address if you would like to receive these obligatory, non-marketing communications by email (for example notice of the Annual General Meeting). This will assist the Credit Union in reducing its carbon foot print and will also reduce costs.

Email address:	
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