

## Privacy Notice of Limerick & District Credit Union Limited Guarantors

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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 carrying out the abovementioned objectives.

Our contact details are:

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

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

Email: [info@lcu.ie](mailto: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](mailto:dpo@lcu.ie) or at the above address.

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

### 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 and contact details, email, telephone number(s), financial data, signatures, salary, payslips, occupation, employment status, income details, outgoings details, accommodation status, mortgage details/statements, bank account details/statements, BIC, IBAN, personal bank statements, credit card statements, interactions with credit union staff and officers on the premises, by phone, or email, CCTV footage, telephone voice recordings,

### Purpose for which we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union;
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/member getting into arrears;
- Collection of the debt; and
- conduct due diligence/credit checking
- in order to meet reporting obligations to the Central Credit Register

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

### **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 Records Management Policy. Your details will be held for seven years following default of the borrower, date of demand, discharge, transfer or repayment of the loan.

Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

### **Updates to this 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](http://www.mylimerickcu.ie) or you can ask us for a copy.

### **How we may share the information**

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU)<sup>1</sup> and our advisers such as solicitors, debt collectors or auditors. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal data with our regulator the Central Bank of Ireland as required to comply with the law. The Privacy Notice of the ILCU is available at [www.creditunion.ie](http://www.creditunion.ie).

Under the Credit Reporting Act 2013 lenders are required to provide personal and credit information for credit applications and credit agreements of €500 and above to the Central Credit Register. This information will be held on the Central Credit Register and may be used by other lenders when making decisions on your credit applications and credit agreements. Guarantors who provide guarantees or indemnities in respect of other loans will also be included at a future date.

The Central Credit Register is owned and operated by the Central Bank of Ireland. For more information see [www.centralcreditregister.ie](http://www.centralcreditregister.ie)

Data we provide to the Central Credit Register (CCR) in respect of your loan will now be shared with the Central Statistics Office (CSO). (The Statistics Act 1993 provides that the CSO may obtain information from public bodies including the Central Bank). Personal data held on the Central Credit Register includes your name, date of birth, address, gender, telephone number and personal public service number (PPSN). Your PPSN, Eircode and contact telephone number is not transferred to the CSO. The Central Bank is the data controller for the Central Credit Register and the obligations of the GDPR and general and data protection law apply to them.

The Central Statistics Office, (CSO) is the data controller for the information when it is transferred to them and the obligations of the GDPR and Data Protection law apply then to the CSO. Please refer to the [www.centralcreditregister.ie](http://www.centralcreditregister.ie) for more information. More information in relation to the CSO is available at [www.cso.ie](http://www.cso.ie)

### **Our use of your information**

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<sup>1</sup>The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring (audit) services to affiliated credit unions. We may disclose information in the guarantee form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

Our legal basis for processing personal data supplied by you for the purpose of this guarantee is in furtherance of this contract and legitimate interest if a credit search /due diligence is conducted.

#### **Information provided to us by you about others or others about you**

There may be instances where you provide us with someone else's personal data or they provide us with yours. Where this occurs, it is important that you seek their approval to disclose their personal data and likewise, they seek yours. We may add it to any personal information we already hold and we will use it in the ways described in this privacy notice.

#### **Planned data transmission to third countries**

This credit union does not currently and does not anticipate any transmission of personal data to third countries. Should this change, we will inform you of the safeguards used to allow for such processing.

#### **Complaints**

Limerick and District Credit Union endeavours to meet the highest standards when collecting, using, storing and destroying your personal information. We urge you to notify us if you think that our processing activities are unfair, misleading or inappropriate. We also welcome any suggestions for improving our procedures. This guarantor privacy notice aims to provide you with comprehensive detail of all aspects of our data processing; however we are happy to provide any additional information that may be necessary. All complaints, queries or suggestions should be addressed to the Data Protection Officer at the Contact details set out above.

#### **Breach Notification**

In the unlikely event that the credit union suffers a data breach, we have an appropriate response plan in place. If your personal data has been breached and is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay. We will also notify the Data Protection Commissioner within 72 hours of becoming aware of the breach. An incident report will be carried out on each breach that occurs to analyse the effects of the breach, why the breach occurred and how we can prevent it happening again.

If you have any concerns regarding data breaches in the credit union or would like to report a data breach to us, you can do so by contacting the Data Protection Officer (details above).

**If you are in receipt of information that does not concern you, please do not destroy the information but return it to our office as soon as possible.**

#### **Contact us**

Questions, comments and requests regarding this Guarantor Privacy Notice are welcomed and should be addressed to the Data Protection Officer.

## **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 (0)1 765 0100 / 1800 437 737

E-mail [info@dataprotection.ie](mailto:info@dataprotection.ie)

Web: <https://forms.dataprotection.ie/contact>

Address: Data Protection Commission

21 Fitzwilliam Square South

Dublin 2 D02 RD28

### **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