



Data Protection Privacy Notice

Information On How We Use Your Personal Data

Altogether, **better.**

Contents

How to Read this Document	4
1. Purpose of Personal Data Collection, Processing, Storage or Use	5
What Personal Data do we Use?	5
Failure to Provide Personal Data	6
Change of Purpose	6
The Use of Particularly Sensitive Personal Information	6
Automated Decision Making/Profiling	7
Data Retention Periods	7
Personal Data transmission to Third Countries	7
Our Use and Sharing of Your Personal Information	8
2. Legal Bases for Processing Your Personal Data	9
Fulfilling Our Contract.....	9
Administrative Purposes	9
Third Parties	9
Products and Services	9
Electronic Payments.....	10
Current Account and Debit Card	10
Irish League of Credit Unions (ILCU) Affiliation	10
Insurance.....	10
Customer Service	11
Sponsorship/Car Draws/Bursaries	11
Our Legal Duty	11
Tax Liability	11
Regulatory and Statutory Requirements.....	11
Court Orders and Law Enforcement.....	12
Audit.....	12
Nominations.....	12
Legitimate Interests	13
Credit Assessment and Credit Reference Agencies.....	13

Guarantors	14
Third Parties	14
Your Image	15
Consent	15
3. Your Data Protection Rights	16
Updates	18
Contact Details	18
Credit Addendum	19
Your Application for Credit and Data Protection - Key Points Summary.....	19
Health Information.....	19
Credit Reference Agencies and the Central Credit Register (CCR)	19
Credit Assessment.....	20
Spouses or Other Third Parties	21

How to Read this Document

This is our general privacy notice which contains information on how we process your personal data and applies to all of our products and services whether this is in relation to loans (and any other type of credit and loan/current account overdraft will be referred to as appropriate), membership, or the running of your account(s) including a current account (and debit card) if you have one.

The notice should be read in conjunction with (and is subject to) the terms and conditions that apply to our products and services and any information that you will be given to by us when you apply and/or avail of our products and services (whether referred to in this notice or otherwise.)

If you apply for a loan/current account overdraft with us, please read this entire document but also refer to the addendum at the end of this notice for ease of reference which summarises some key data protection points specifically in relation to credit that we want you to be aware of and that we want to reinforce. This notice and the addendum are one document and must be read together and in their totality.

Along with the credit addendum referred to, the notice is set out in the 3 main numbered sections below. If there is anything that you do not understand or if you require specific/further information or if you have a specific/further question that is not covered, or if you require paper copies of this document, please enquire at any of our branches or contact us via the contact details contained at the end of this notice.

1. Purpose of Personal Data Collection, Processing, Storage or Use

North West Credit Union, which is regulated by the Central Bank of Ireland, is committed to protecting the privacy and security of your personal information. This notice describes how we collect and use personal information about you during and after your relationship with us.

The sole purpose of the use of your personal information is to provide credit union services to you whether for example in person, over the telephone or via our various online electronic membership/account opening and loan application delivery channels. More information on these can be found in this privacy notice and the electronic applications that you may use when availing of such services.

What Personal Data do we Use?

In summary, we may collect, use and store the following categories of personal information about you either in paper or electronic form (which will be dependent on which credit union service you avail of):

Name, address, date of birth, email address, telephone number, financial data, status and history, transaction data, contract data, details of the credit union product you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, your spouse, partner, nominee, guarantor or other connected third party details (see also the credit summary in the addendum at the end of this document where these third parties are referenced under the heading 'Spouses or Other Third Parties'), Tax Identification Numbers (TIN), Personal Public Service Numbers (PPSN), legal documentation, third party professional services correspondence, local authority/government correspondence, records of discussions with our personnel whether on our premises, by phone or email, current or past complaints, CCTV footage and your image (for security and verification purposes) and telephone voice recordings with respect to both incoming and outgoing calls.

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

- Information about your health or any medical conditions (when it is required in connection with a loan application) (See the section on Insurance for further details); and

- Biometric data but only when you give your specific consent and only when you apply for membership/open an account with us via our online electronic membership/account opening application. Further details on this can be found in the application when you apply.

We need all of this information to contact you, to identify and verify who you are, to comply with our legal obligations and to be able to provide you with our services.

See the section on Our Use and Sharing of Your Information for more specific detail and some examples on why we collect and process your personal data and who we share it with.

Failure to Provide Personal Data

If you fail to provide information when requested, we may not be able to provide our services to you.

Change of Purpose

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

The Use of Particularly Sensitive Personal Information

Special categories of particularly sensitive 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:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations and in line with our data protection policy; and
- 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 the section on Insurance for more details in relation to information relating to your health and for biometric data the online electronic membership/account opening application referred to above.

Automated Decision Making/Profiling

Sometimes we may use electronic systems to assist us to make decisions based on personal information we have (or are allowed to collect from others) about you. This information may be used for credit assessment, membership/account opening and anti-money laundering purposes. Please let us know if you would like further information on these processes and how they may impact our provision of services to you.

See also the Credit summary in the addendum at the end of this document where this point is referenced under the heading 'Credit Assessment.'

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, taking into account any legal/contractual obligation to keep it. For example, and as a general rule, we are required to keep your personal information whilst you are a member and for 6 years post the date that your membership ceases.

Personal Data transmission to Third Countries

For the majority of our services, we do not transfer your personal data to countries outside the European Economic Area (EEA) or those countries not deemed by governmental authorities to have an equivalent system of data protection in place.

When using our online electronic membership/account opening and loan application delivery channels there may be some transfer of personal data to third countries outside of the above. This however will be limited to a very specific purpose and will always be governed by any required legal contracts between the relevant parties and/or government proclamations of legitimacy regarding such personal data transfers. Examples of where this may happen are:

- in relation to the collection and transfer of biometric data to the United States of America/India for the purposes of applying for membership/opening an account with us via our online electronic application;
- in relation to our current account and debit card, some of your data may be transferred outside of the EEA (for example the United Kingdom) which is connected to the business of the service providers who we rely on to assist us to provide this particular service to you.

Please see the applicable electronic applications, **the current account information which you will receive if and when you apply (and after when and if you have a**

current account and/or if you are already a card holder). Please refer to <https://currentaccount.ie/> and <https://currentaccount.ie/files/tpl-privacy-policy.pdf> for full details on the current account or debit card and/or contact us if you would like further information on such data transfers.

Our Use and Sharing of Your Personal Information

We will only collect, use and store relevant information about you, your transactions, your use of our products and services, and your relationship with us if we have a legal reason and purpose to do so. This is outlined further under the grounds below with some accompanying examples which are entitled our legal bases for processing your personal data. Some of these may overlap and there may be several grounds/examples which justify such use of your personal information (these lists are not exhaustive).

2. Legal Bases for Processing Your Personal Data

Fulfilling Our Contract

This basis is appropriate where the processing is necessary for us to manage your accounts and provide services to you which includes the following headings.

Further information is available on request from us about any of the third parties we use to assist us in providing our services to you and which may concern the processing of your personal data.

Administrative Purposes

We will use the information provided by you to us to administer your accounts and so that we are able to provide services to you. This may involve the disclosure of your information to your authorised representatives when required.

Third Parties

We may appoint external third parties to undertake operational, oversight and advisory functions on our behalf. We will ensure that any information passed to third parties conducting such functions will do so with respect for the security of your data and will be protected in line with applicable law. Such functions include for example information technology, audit, credit control, accountancy, and legal services.

We may also use the services of debt collection agencies if you are in breach of any loan agreement. This will involve passing your personal information to agencies such as solicitors, private investigators and other third parties so that debts can be collected.

Products and Services

We may share your information with third parties who may assist us in providing current or future products or services to you. This includes for example foreign exchange, debit cards, prepaid cards, mortgages, home loans, particular lending products, insurance and the online electronic membership/account opening and loan applications mentioned in this privacy notice.

Electronic Payments

For the processing of electronic payments services (such as credit transfers, standing orders and direct debits) we use Payac Services Company Limited by Guarantee (CLG) ('Payac') as our electronic payments service platform and service provider in this regard. Payac is an outsourced model engaging third party companies such as partner banks and operational sub-service providers to assist them to assist us with the processing of payment data and who have the required licensing to provide these services to you. For further information see: <https://payac.ie/>

Current Account and Debit Card

We also use Payac to provide current account and debit card services to you. Payac is an outsourced model engaging third party companies such as partner banks and operational sub-service providers to assist them to assist us with the provision of these services. For further information see: <https://payac.ie/>.

For further information in relation to the current account or debit card please refer to the information which you will receive when and if you apply (**and after when and if you have a current account and/or if you already are a card holder.**) Please refer to <https://currentaccount.ie/>.

Irish League of Credit Unions (ILCU) Affiliation

The ILCU is a trade and representative body for credit unions in Ireland which we are affiliated with and bound by their rules. We may disclose information in your application or in respect of any account or transaction of yours to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us and any Savings Protection Scheme (SPS) in operation. Please see the ILCU website for further details on the services they provide to us: <https://www.creditunion.ie/>

Insurance

As part of our affiliation with the ILCU, we carry insurance products from ECCU Assurance Designated Activity Company (DAC) ('ECCU') which includes Life Savings (LS) and Loan Protection (LP), where it applies. To administer these products and services we may pass your details to ECCU which is a life assurance company wholly owned by the ILCU and exists to provide insurance services to affiliated credit unions. It is a term of your membership by virtue of our affiliation with ILCU that we must apply to ECCU for LP if you choose to take out a loan with us. If covered, and subject to terms and conditions, 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 information will be shared with ECCU to allow it to deal with insurance underwriting, administration and claims on our behalf. For more information see their website: <https://www.creditunion.ie/ilcu/associated-companies/eccu/>

See also the credit summary in the addendum at the end of this document where this point is referenced under the heading 'Health Information'.

Customer Service

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

Sponsorship/Car Draws/Bursaries

We may use your image (by photograph or video) and name under the terms of any sponsorship we may provide for any event you are involved with or under the terms of any credit union prize draw or bursary scheme that involves your participation. This information may appear in promotional material in our premises or Annual General Meeting (AGM) booklet for example, the local press or on our website or social media accounts.

Our Legal Duty

This basis is appropriate when we are processing personal data to comply with applicable 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, we have certain reporting obligations to the Revenue Commissioners 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.

Regulatory and Statutory Requirements

To meet our duties to regulators (which includes 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 process your personal data and share your information with certain statutory bodies if required by law for example for Anti-Money Laundering (AML) or Combating Financing of Terrorism (CFT) purposes.

Court Orders and Law Enforcement

We may have to disclose your information to third parties if required by court order or for reasons of law enforcement and/or for the detection and prevention of fraud. This includes for example in relation to compliance with our AML and CTF obligations under applicable AML and CTF law.

Audit

To meet our legislative and regulatory duties for general compliance and to maintain audited financial accounts we appoint auditors in various capacities. We allow such auditors 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/persons to receive a certain amount of funds from their account on death, subject to a statutory maximum. We must record and process the personal data of nominees in this event and you should inform your chosen nominees of this fact and show them a copy of this privacy notice.

Sepa Regulation

In order to comply with the Sepa Regulation with respect to relevant electronic payments, we or our appointed service providers (or sub providers) are required to confirm to other financial institutions whether there is a match to your name, a close match, or no match when someone tries to make a payment to you. The same checks and verifications apply to payments from your accounts with us. Please see our website for further information: [SEPA Instant](#)

Legitimate Interests

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not be disproportionate or unfairly go against what is right and best for you.

Please refer to the following examples.

Credit Assessment and Credit Reference Agencies

We may share information you have provided to us with credit reference agencies (which includes the Central Credit Register (CCR)) to verify your identity and suitability for a loan/current account overdraft, using information from the Electoral Register and other public sources. When you apply to us for a loan, we may check the following:

- Records at credit reference agencies. When credit reference agencies receive a search from us, they will place a search footprint on your credit file that may be seen by other lenders. They supply to us both public (including the Electoral Register) and shared credit and fraud prevention information; and
- Those at fraud prevention agencies.

Our legitimate interest here is that, as a credit union, we must act in the best interests of all our members and lend responsibly and using your credit scoring information helps us to achieve this. When using the service of a credit referencing agency, we will pass them your personal details and details of your credit performance for the purpose of determining the suitability of the loan applied for.

The searches we make may also assess your application for the purpose of verifying identities, to prevent and detect crime and money laundering. We may also make periodic searches at credit reference agencies and fraud prevention agencies to manage your account with us as a part of our ongoing customer due diligence.

If you are making a joint application or tell us that you have a spouse or financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. Credit reference agencies also link your records together and these links will remain on your and their files until such time as you and your partner successfully files for a disassociation with the credit reference agencies to break that link. See also the Credit summary in the addendum

at the end of this document where this point is referenced under the heading 'Spouses or Other Third Parties'.

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

In accordance with the above, we share your personal data with the CCR when legally required to do so and search this register to protect our legitimate interests as specified. See their website at [Central Credit Register](#) for further detail and the effects on your credit record when applying for and if successful receiving a loan/current account overdraft from us.

Please also refer to the link on our website: [The Central Statistics Office and the Central Credit Register](#) which contains further information on how the CCR may process your personal data and what third parties they may share your information with (for example: the Central Statistics Office (CSO)).

Please note that if you do not meet the repayments on your loan/current account overdraft, your account will go into arrears. This may affect your credit record, report and rating which may limit your ability to access credit in the future.

See also the credit summary in the addendum at the end of this document where this point is referenced under the heading 'Credit Reference Agencies and the Central Credit Register (CCR)'.

Guarantors

Any application for credit which we may agree to provide you may be subject to having a guarantor in place. This is when another person or entity agrees to repay the amount owed to us if you are unable to and our legitimate interest is to ensure that the credit provided is repaid. We will share your personal information with such persons or entities for this purpose.

Likewise, if you are acting as the guarantor in these circumstances, your personal information will be used and shared for the purposes of providing the guarantee which includes disclosing information to relevant third parties as required. Part of this may involve a check being carried out on you in the way described above.

Third Parties

If third parties provide their consent for us to process their personal data in support of application you may make to us for example in relation to credit, we may share your personal data with them for these purposes and a copy of their consent will be kept on file with your records. Our legitimate interest for doing this is to justify for

example the granting of credit which may not happen without the third-party supporting information in place.

See also the lending summary in the addendum at the end of this document where this point is referenced under the heading 'Spouses or Other Third Parties'.

CCTV

We have CCTV footage installed in our premises with clearly marked signage. The purpose of this is for security and this is our legitimate interest.

Your Image

When you open an account or when we need to update your identification we will take and/or store your image and place this on our systems. This will be displayed on our account screens when we access your account information and at the front counter when you come in to transact with us. The online electronic membership/account opening application referred to in this notice will also capture your image and unless you indicate otherwise on the electronic application this will be used in the way described here. The purpose of this is to help us to identify you, to provide security and to help prevent fraud. This is our legitimate interest.

Consent

Sometimes we need your consent to use your personal information. With direct marketing for example, we need your consent to make you aware of products and services which may be of interest to you.

We may also need your consent if you are a third party who is willing to provide your personal information to us to support an application to us for one of our services for example in relation to credit.

Before you give your consent, we will tell you what information we collect and what we use it for. For example, in relation to the collection and use of biometric data, the online electronic membership/account opening application referred to in this notice will contain the relevant information and request for consent. You can withdraw your consent at any time by contacting us.

3. Your Data Protection Rights

Consistent with the requirement to have a legal basis for processing your personal data as outlined above, you also have certain rights in relation to such processing under applicable data protection law.

These are:

- To find out whether we hold any of your personal data. If we do hold it, then you have the right to request access to that data and to be furnished with a copy. You are also entitled to request further information about the processing;
- To request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified;
- To request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You have also the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- To object to processing of your personal information 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 information for direct marketing purposes;
- To request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you in certain circumstances;
- To withdraw your consent at any time and free of charge when this is the sole basis upon which we process your personal information;
- To request that we provide you with a copy of any relevant personal data* in a reusable format or request that we transfer your relevant personal data to another data controller where its technically feasible to do so. (*relevant personal data is personal data that you have provided to us or which is generated by the use of our services which is processed by automated means and where the basis that we process it is on your consent or to fulfil a contract you have with us).

Please note that the above rights are not always absolute and there may be some limitations.

For example, the exercise of your rights may result in us having to suspend your account or the services that we offer you.

Please also note that we reserve the right to contact members by such means as best available in the normal course of operations and to be able to provide our services. This includes for example in relation to a non-performing loan or outstanding debt to the credit union and whether by text or email or otherwise.

There is no fee for exercising any of these rights unless we deem your request to be unfounded or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to verify your identity if we have any doubts as to who you are and we will not be able to act on any requests in relation to your personal data until we receive this verification and are satisfied with it.

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 your personal information.

Updates

We reserve the right to make changes to this notice from time to time without notice to you. You can always find an up-to-date version of this notice on our website, in our offices or you can ask us for a copy.

Contact Details

Any queries with respect to this notice or if you want to exercise any of your rights in relation to your personal data, please contact:

The Data Protection Officer,

North West Credit Union,

Wine Street,

Sligo.

Telephone: 071 9317500

www.nwcu.ie

Please also note that you have a right to complain to the Data Protection Commission (DPC) in respect of any processing of your personal data by:

Telephone: 076 110 4800/057 868 4800
South Dublin 2, D02 RD28, Ireland

Post: DPC, 21 Fitzwilliam Square,

Please also see the DPC website for how to complain and for further information on data protection law and the rights available to you (this website also contains the most up to date contact details for the DPC and their preferred method of contact for example by the online webforms available.):

<https://www.dataprotection.ie/>

Credit Addendum

Your Application for Credit and Data Protection - Key Points Summary

The purpose of this addendum is to bring to your attention and to reinforce some key data protection points when you apply to us for credit (loan, current account overdraft will be referred to as appropriate.) The document is useful as a summary of same and should be read together with the rest of the content in this notice. The notice and the Addendum are one document and must be read together and in their totality (any abbreviations used are defined elsewhere in the document.)

If you would like any further information on anything stated or third parties referred to or anything you do not understand please contact us via the contact details contained in this notice.

Health Information

It is a term of your credit union membership by virtue of our affiliation with ILCU that we must apply to ECCU for LP Insurance if you choose to take out a loan with us.

If covered, and subject to terms and conditions, any outstanding sum will be repaid to us 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 information will be shared with ECCU to allow it to deal with insurance underwriting, administration and claims on our behalf. For more information and ECCU's privacy policy see the following link: <https://www.creditunion.ie/ilcu/associated-companies/eccu/>

Credit Reference Agencies and the Central Credit Register (CCR)

We may share information you have provided to us as part of your loan/current account overdraft application with credit reference agencies (which includes the CCR) to verify your identity and suitability for a loan using information from the Electoral Register and other public sources.

When you apply to us for a loan/current account overdraft (and as part of our ongoing customer due diligence), we may check the following:

- Records at credit reference agencies. When credit reference agencies receive a search from us, they will place a search footprint on your credit file that may be seen by other lenders. They supply to us both public (including the Electoral Register) and shared credit and fraud prevention information; and

- Those at fraud prevention agencies.

We also share your personal data with the CCR when legally required to do so and search this register in relation to the above purposes. See their website at <https://www.centralcreditregister.ie/> for further detail and the effects on your credit record when applying for and if successful receiving a loan/current account overdraft from us.

Please also refer to the link on our website: [The Central Statistics Office and the Central Credit Register](#) which contains further information on how the CCR may process your personal data and what third parties they may share your information with (for example: the Central Statistics Office (CSO)).

Please note that if you do not meet the repayments on your loan/current account overdraft, your account will go into arrears. This may affect your credit record, report and rating which may limit your ability to access credit in the future. In these circumstances, we may also use the services of debt collection agencies if you are in breach of any loan agreement. This will involve passing your personal information to agencies such as solicitors, private investigators and other third parties so that debts can be collected.

Credit Assessment

Sometimes we may use electronic systems and credit scoring tools to assist us to make decisions on your loan application/current account overdraft and the personal information you provide to us in this regard.

These systems and tools may be provided by third party specialist providers whom we appoint to provide these services to us.

This may apply in relation to specific lending products that we may offer from time to time and when and if you apply for such products you agree that we may use third party systems to assist us in assessing any such application.

Where you opt to use the Open Banking service from such a provider in connection with your loan application, such provider will collect your third-party financial institution(s) account information based on your explicit consent for processing by these providers and their affiliates on our behalf.

This provider will request this consent from you by electronic means along with a copy of their most up to date privacy notice which you can consult for full and further information when you receive this request.

Spouses or Other Third Parties

If you are providing your spouse or another third parties information in support or as part of your loan/current account overdraft application, please make sure you have their consent to provide this to us and ensure they sign the relevant paperwork where indicated.



North West Credit Union, Wine Street, Sligo

Tel: 071 9317500

www.nwcu.ie

Altogether, **better.**

North West Credit Union Limited is Regulated by the Central Bank of Ireland.