



PRIVACY NOTICE

Recruitment

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.

North West Credit Union (NWCU) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal data about you during and after the recruitment and selection process for a position with us.

This privacy notice is for distribution amongst all potential job applicants to the credit union including employees, contractors, agency workers, consultants, directors, officer and volunteers of the credit union. There may be elements of the notice that are not applicable to you according to the specific role you apply for within the credit union.

Please note that all telephone calls to and from NWCU are recorded for quality assurance and verification purposes.

Please also note that NWCU has no responsibility for your personal data if and until NWCU actually receives it (whether this comes via any third parties who we may have appointed for recruitment purposes or otherwise.) Once in receipt of same, NWCU's obligations are in accordance with applicable law and what is stated in this notice.

In summary, we may collect the following information:

- The information you have provided to us in your application or during interview whether by application form, curriculum vitae, covering letter or otherwise;

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Tax Identification number;
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests; and
- Details of your referees.

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

- Information about your race or ethnicity;
- Information about your health, including any medical condition, health and sickness records; and
- Information about criminal convictions and offences.

We may also collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Where applicable, information regarding your criminal record, in criminal records checks and credit history and any other data revealed during background screenings;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information; and
- A copy of your driving licence (if relevant to the position you are applying for).

How we collect the information

We collect personal data about candidates from the following sources:

- Data you submit to us (or via any third parties we may have appointed) in your application or during interview whether by application form, curriculum vitae, covering letter or otherwise;
- From recruitment agencies, human resources consultants or partners, third party placement firms or job search websites;
- From background check providers;
- From credit reference agencies; and
- From named referees.

Why we collect the information and how we use it

We will typically collect and use this information for the following purposes and bases which may overlap and change from time to time:

Fulfilling Contract

We need to process your personal information to decide whether to enter into a contract with you.

Legal Duty

We need to process your personal information to comply with an applicable law. For example, to check your eligibility to work, keep records for hiring processes and/or to undertake criminal/regulatory record checks if required.

Legitimate Interests

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. An example is when we assess your skills and qualifications in order to uphold our legitimate interest of only selecting individuals suitable to the role applied for and the credit union's best interests.

Once we receive your application, we will then process that information to decide whether you meet the necessary requirements to be shortlisted for the role. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position, we will then take up references and our pre-employment checks before confirming your appointment.

In general, access to your personal data will be restricted to minimise the number of people in the credit union or our appointed third parties who need it in order to evaluate your application for recruitment or who we are compelled to provide it to under applicable law.

We seek to ensure that our information collection and processing is always proportionate.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use special category data

We will use your special category data in the following ways:

- We will use information about your race or national or ethnic origin to establish if we require a work permit for you to be eligible to work for us; and
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation.

Information about criminal convictions

We will process information about criminal convictions with respect to roles where we are required to do so under applicable law. The purpose of this is comply with our legal obligations but also to satisfy ourselves that there is nothing in a candidate's criminal convictions history which makes them unsuitable for the role.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we may share your personal information

We may need to share your personal data with third parties so that we can comply with our legal obligations, prepare to perform our contract with you (if successful) and protect legitimate or vital interests. For example, this includes human resources consultants and partners, background check providers, the Irish League of Credit Unions (ILCU), insurers, professional advisers and our

service providers. We may also be required to share some personal data with our regulators the Central Bank of Ireland or other official bodies as required to comply with applicable law.

Data retention periods

Our policy is to retain your personal data for a period of 12 months after we have communicated to you our decision about whether to appoint you to the position. This is so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your appointment. Information collected by us when individuals are appointed is set out in our data protection privacy notice for Credit Union Personnel (which will be made available should you be successful).

Your rights

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;
- Request the restriction of processing of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances;
- Where we are processing your data based solely on your consent you have a right to withdraw that consent at any time and free of charge;
- Request that we: a) provide you with a copy of any relevant personal data in a reusable format; or b) request that we transfer your relevant personal data to another controller where it's technically feasible to do so. 'Relevant personal data is personal data that: *You have provided to us or which is generated by your use of our service. Which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.*

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

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.

Please help us by telling us straightaway if there are any changes to your personal information.

Updates

We reserve the right to make changes to this notice from time to time. Up to date copies can always be found on our website.

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

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. Their contact details can be found at:

<https://www.dataprotection.ie/en/contact/how-contact-us>

The DPC website is also useful in terms obtaining further information on data protection law and the rights available to you at:

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