



Lending Privacy Notice

We at Croí Laighean Credit Union (CLCU) take personal privacy very seriously and take steps to ensure that your data is used and stored in a secure manner. We want you to know what we do with personal information that you and others provide to us. This statement explains how we use your data and what rights you have in relation to your personal information. This Privacy Statement should be read in conjunction with Terms and Conditions / contracts.

1. Who we are

Throughout this Privacy Statement 'we', 'us', 'our', and 'ours' refers to Croí Laighean Credit Union. For more information about us, see our website at www.clcu.ie.

This notice is so that we provide you with information around the use of your data for lending or lending related purposes. This notice also applies to any person who guarantees a loan for a member of the credit union.

Croí Laighean 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 ends, in accordance with the Data Protection Act 2018

Credit Union	Croí Laighean Credit Union
Addresses	Edenderry: O'Connell Square, Edenderry, Co. Offaly, R45 PR99. Coill Dubh: Coill Dubh, Naas, Co Kildare, W91 XD99 Leixlip: Main Street, Leixlip Kildare, W23 N9X0 Clane: College Rd, Capdoo Commons, Clane Co Kildare, W91AY65.
Email	welcome@clcu.ie dpo@clcu.ie
Phone Number	1800 23 24 25
Website	Credit Union Croí Laighean Credit Union www.clcu.ie

2. 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, email, telephone number, financial data, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPS numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, other creditors, telephone call recordings, images on CCTV when you visited our premises.

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:

- Assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- Conducting credit searches and making submissions to 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.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.

We may also collect, store and use the following “special categories” of more sensitive personal data:

- 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 comply with 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 data.

How we use particularly sensitive personal data

Special categories of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data 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.

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. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymized, 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 data

If you fail to provide certain information when requested, we may not be able to fulfil the contract we have entered 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 data for unrelated purposes, we will notify you and we will explain the legal basis which allows us to do so.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loan assessment and anti-money laundering purposes and compliance with our legal duties in that regard.

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, considering any legal/contractual obligation to keep it. Where possible we record how long we will keep your data, where that is not possible, we will explain the criteria for the retention period. This information is documented in our Retention Policy.

Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- Credit agreements are contracts and as such the credit union retains them for seven years from date of completion or top up, and twelve years where the document is under seal.
- Loan applications form part of your credit agreement and as such we retain them for seven years.
- We are obliged to retain a Register of Members and Officers permanently. The register is available for inspection at our premises by an accountant appointed by the Central Bank. The data available for inspection is:
 - Account number
 - Name and address
 - Savings and loan balances held by a member
 - The date when the member entered as a member
 - The date when the person ceased to be a member.
- We may also share information with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland if required by law.

Transfers outside the EEA.

We will only transfer Personal Data outside the EEA if necessary and with appropriate safeguards in place.

If we, or a data processor, transfer your personal data outside the EEA, we will safeguard your data by ensuring a minimum of one of the following safeguards is in place:

- a contract based on “model contractual clauses” (also called Standard Contractual Clauses) approved by the European Commission, obliging them to protect your personal data.
- Binding Corporate Rules approved by relevant data protection authorities; or
- with companies located in a third country approved by the European Commission under an adequacy decision, such as the UK.

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 relationship with us. We will typically collect and use this information for the purposes on the following pages.

3. OUR LEGAL BASIS

We have set out here the legal basis we use to process Personal Data.

All processing of Personal Data must be lawful. Processing will only be lawful if we have a legal basis for processing.

➤ Contract

We will process Personal Data where necessary to perform our obligations relating to or in accordance with the terms and conditions of any contract you enter with the Credit Union (such as the membership agreement or loan agreement) or to take steps at your request prior to entering into such agreement.

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 maintain and administer any accounts you have with the credit union.

Security: To secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or other personal assets.

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

Guarantors: As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that credit union ensures the repayment of your loan. Should your 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. If your circumstances change it may be necessary to contact the guarantor

Electronic Payments: 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 Payac CLG. Payac is a member owned credit union service organization that provides an electronic payments service platform for the credit union movement in Ireland. Payac is an outsourced service engaging third party companies, such as a Partner Bank, to assist with the processing of payment data. The Payac Privacy Notice can be found at <https://payac.ie/privacy-policy/>

Credit Assessment: When assessing your application for a loan, the credit union will take several factors into account and will utilize personal data provided from:

- your application form and your loan supporting documentation
- your existing credit union file,
- credit referencing agencies such as the Central Credit Registrar (CCR)

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit union's lending policy. Where a guarantor is required for a loan, they will undergo the same credit assessment (including CCR check) as the borrowing member.

Member Service: To help us improve our service to you, 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 Irish and EU Law .

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorized people to see our records (which may include information about you) for reporting, compliance and auditing purposes. An example of this is our legal obligation to file reports and make checks on the Central Credit Register in accordance with the Credit Reporting Act 2013. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland, the appropriate Supervisory Authority if required under law.

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

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under money laundering provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended. Croi Laighean credit union is also required to file reports with authorities on the Beneficial Ownership Register, the Beneficial Ownership Register for Certain Financial Vehicles (CFV), the European Union Cross-Border Payments Reporting platform (CESOP), the Central Register of Beneficial Ownership of Trusts (CRBOT) and the Ireland Safe Deposit Box and Bank Account Register (ISBAR). These reporting obligations require the credit union to submit certain member data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. For further information, please contact the credit union.

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.

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 to the CCR. Where a guarantor is in place for a loan, Croi Laighean Credit Union is obliged to report this to the CCR who will include limited details of the loan on the guarantor's credit report. Further details can be found on www.centralcreditregister.ie.

Connected/Related Party Borrowers: We are obliged further to Central Bank Regulations to identify where borrowers are connected 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 family member of the Board/ Management team, or a business in which a member of the Board /Management Team has a significant shareholding

➤ 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. If we rely on our legitimate interest, we will tell you what that is.

Credit Assessment and Credit Reference Agencies:

When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from credit referencing agencies such as the Central Credit Register - See legal duty.

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 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.

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 can contact you and details of the indebtedness in order that they recover the outstanding sums. We use a debt management service to, for example, contact you if you fail to make repayments on your loan or fail to contact the credit union.

Our legitimate interest: The credit union, where appropriate will necessarily take steps to recover a debt to protect the assets and equity of the credit union

Voice Recording: We record phone conversations.

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

CCTV: We have CCTV installed on the premises with clearly marked signage. The purpose of this is for security, public safety, dispute resolution and the prevention and detection of fraud.

Our legitimate interest: Regarding 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 and to prevent and detect fraud.

➤ 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 specialist market research companies. See section on Your Marketing Preferences.

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 the 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 situation which makes you want to object to processing on this ground. You also have the right to object to where we are processing your personal data for direct marketing purposes.



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

You have a **right to complain** to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Webform available on https://forms.dataprotection.ie/contact	Postal Address: Data Protection Commission 21 Fitzwilliam Square South Dublin 2 D02 RD28
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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 the Data Protection Officer in writing using their contact details on page 1.

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 always meet your expectations. Please help us by telling us straightaway if there are any changes to your personal data.



Croí Laighean
CREDIT UNION