



Carrick-on-Suir Credit Union

Account Opening Privacy Notice

1. Scope

This notice is a summary of how Carrick-on-Suir Credit Union commits to protecting the rights and privacy of individuals whose data is collected, processed and stored in connection with opening and administering an account at the credit union. We ensure that our account opening function adheres to data protection legislation and its key principles.

This notice is intended as a summary and should be read in connection with Carrick-on-Suir Credit Union's Privacy Policy which can be found on our website: <https://www.carrickcu.ie> that covers all processing of personal data carried out by us.

2. Rights and Principles

The GDPR, transposed into Irish law with the Data Protection Act 2018, provides the following rights for individuals as well as setting down principles of data processing:

RIGHTS OF INDIVIDUALS	PRINCIPLES OF DATA PROCESSING
The right to be informed	Lawfulness, fairness and transparency
The right of access	Purpose limitation
The right to rectification	Data minimisation
The right to erasure	Accuracy
The right to restrict processing	Storage limitation
The right to data portability	Integrity and confidentiality (security)
The right to object	Accountability
Rights in relation to automated decision making and profiling.	

Should you require further information regarding the above rights or principles, please consult our Privacy Policy on our website or you can contact our DPO using the details below.

3. Types of Personal Data

In order to carry out our lending functions, we are required to collect, process and store certain personal data including:

- Name, address, date of birth, email, telephone numbers, signatures, identification documents (eg. passport drivers licence), address verification documents (eg. utility bill, bank statement), beneficial owners' information, employment details, politically exposed person status, tax residency, source of funds, nomination details, PPSN, details of interaction with staff, CCTV footage.

4. Purposes for processing Personal Data

Carrick-on-Suir Credit Union will use personal data in order to carry out the following functions:

- To open and maintain an account.
- Verifying the information provided in the application.
- To comply with our legal obligations, for example anti-money laundering, to identify connected borrower, to identify a politically exposed person.
- To confirm tax residency for the purposes of the Common Reporting Standard.
- To meet our obligations under the Credit Union's Standard Rules.
- To provide members with details of the Deposit Guarantee Scheme.
- To contact members in respect of their accounts.

- To record details of nominations and to process the nomination (subject to a valid nomination) and transfer any nominated property to the nominee(s).
- To issue obligatory information to members (eg. AGM notifications).
- To issue members with information on any product or service held at the Credit Union, unless members have opted not to receive this.

5. Data Sharing and Data Transfers

We are obliged to share certain personal information with third parties, ways in which this may occur include:

- With official bodies including, but not limited to:
 - the Irish League of Credit Unions (ILCU) under the ILCU Standard Rules and the League Rules which govern the operation of Credit Unions.
 - Government Departments such as Department of Finance and the Department of Social Protection may require the Credit Union to share certain personal information in order to meet legislative and regulatory requirements.
 - the Revenue Commissioners impose certain reporting obligations on Credit Unions under the Common Reporting Standards in relation to tax residency and the in respect of dividend or interest payments to members.
 - the Central Credit Register to meet our regulatory reporting obligations.
- To engage external IT providers so as to ensure the security of our IT systems in order to protect all personal data.
- With our insurers or assessors when providing or reviewing information in the event of an incident occurring.
- To engage professional services of third parties, such as auditors, solicitors or any other such business advisers. Any such parties are bound by confidentiality.
- We reserve the right to report to law enforcement any activities that we, in good faith, believe to be illegal.
- To provide information to An Garda Síochána or other Government bodies or agencies when required to do so by law.

6. Lawful Basis for Processing Personal Data

For processing of personal data in relation to a loan the lawful basis we rely on are:

Article 6.1(b) GDPR: *“processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”.*

- The processing is necessary for us to manage accounts and credit union services provided to our members.
- To perform any part of a contract as per the Terms and Conditions outlined to our members in any such process.

Article 6.1(c) GDPR: *“processing is necessary for compliance with a legal obligation to which the controller is subject”.*

- To comply with the regulations as outlined in the Credit Union Act 1997 (as amended);
- To meet our duties to the Regulator, the Central Bank of Ireland.
- To fulfil reporting obligations to Revenue related to a member’s tax liability under Common Reporting Standard.
- To comply with regulatory reporting obligations by submitted information to the Central Credit Register.
- To comply with anti-money laundering and combating terrorist financing obligations.
- To comply with credit reporting obligations.
- To comply with Connected/Related Party Borrowers obligations.

Article 6.1(f) GDPR: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party”.

- CCTV footage. Our legitimate interest: we have CCTV for the security of our staff, members, and any other visitors as well as for the purpose of the prevention and detection of fraud or verification of transactions.

Article 6.1(a) GDPR: “the data subject has given consent to the processing of his or her personal data for one or more specific purposes”.

- Marketing and Research: to provide our members with details on our products and services provided they have not opted out of receiving such communications and to carry our market research. Individuals can opt-out of receiving marketing communications at any time.

7. Data Retention and Security

We have appropriate technical and organisational measures in place to protect all personal data that we process and store. Further details can be found in our detailed Privacy Policy on our website: <https://www.carrickcu.ie>.

All documentation collected in connection with a member opening an account will be retained for the duration of membership of the credit union plus 7 years. Other retention periods will apply to specific data such as CCTV which is retained for one month. Full retention information is contained in our Records Retention Schedule.

8. Contact Details

If you have any questions or concerns related to this notice, you can contact us at:

Address: Greystone Street, Carrick on Suir, Co Tipperary

Phone: 051-640675

Email: info@carrickcu.ie