



Lending 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 applying for, availing of and repaying a loan from the credit union. We ensure that our lending 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 (www.carrickcu.ie) that covers all processing of personal data carried out by us.

2. Rights and Principles

The GDPR and the Data Protection Act 2018, provide the following rights for individuals as well as setting down principles of data processing which are:

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 Data Protection Officer (DPO) using the details at the end of this notice.

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:

- **General:** name, address, date of birth, email address, telephone numbers.
- **Financial data:** bank account details, financial status and history, banking details and transactions, borrowings.
- **Contract data:** signatures, identification documents, salary, occupation, payslips, source of wealth, source of funds, Politically Exposed Status, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPS numbers, passport details, driver license details, tax residency, beneficial owners information, medical information, tax clearance access number, utility bills or other proof of address documents.
- **Special category data:** health data.
- **Other data:** CCTV footage, email correspondence.

4. Purposes for processing Personal Data

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

- Assessing a loan application and determining creditworthiness for a loan.
- Verifying the information provided in the application.
- Conducting credit searches and making submissions to Irish Credit Bureau and the Central Credit Register.
- To apply credit scoring techniques and other automated decision-making systems to either partially or fully assess an application.
- Health data is required in order to purchase loan protection and life savings protection from ECCU.
- To determine whether an applicant is a connected borrower or related party borrower in order to comply with Central Bank Regulations.
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.
- To take steps to secure repayment of a loan such as processing a charge on a property.
- Providing updates on loan products and services by way of directly marketing to members.
- To contact members regarding a loan enquiry received by various means such as through our website, by phone or by email.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union.
- To complete a Central Credit Register submission.

- To send an email or SMS to members to inform them when their loan is near completion or completed.
- Where there is a breach of the loan agreement, we may use the service of a solicitor or debt collector. We will pass them details of the loan application in order that they make contact and details of the indebtedness in order that they recover the outstanding sum.
- Providing updates on our loan products and services by way of directly marketing to you.

Guarantors: As part of the conditions of a loan, the appointment of a guarantor may be a requirement in order to ensure the repayment of a loan. We are obliged to collect certain personal data relating to the guarantor in such instances. The loan balance and repayment details may be communicated to the guarantor at any time for the duration of the loan. Should an account go into arrears, it may be necessary to call upon the guarantor to repay the debt in which case they will be given details of the outstanding indebtedness. If certain circumstances change, it may be necessary to contact the guarantor.

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.
 - ECCU Assurance DAC who provide Loan Protection and personal data must be shared in order to administer claims or deal with insurance underwriting.
 - The Central Credit Register who provide financial institutions with credit details relating to a member's eligibility for a loan.
 - The Central Bank of Ireland enforce certain reporting, compliance and auditing on Credit Unions. We are obliged, further to Central Bank Regulations, to identify where borrowers are connected in order 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 member of the Board/Management teams family or a business in which a member of the Board /Management Team has a significant shareholding;
 - 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.
- 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.

We do not transfer your personal data to any third parties located outside the EU as part of an application, processing and administration of a loan.

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”.*

- For the purpose of assessing any loan application, processing applications individuals make and to maintain and administer any accounts held with the credit union.
- In order to process payments on your account.
- To apply for Loan Protection or to avail of ILCU Savings Protection Scheme (SPS).
- To process a credit assessment and submit CCR enquiries when a member applies for a loan.
- To perform any part of a contract as per the Terms and Conditions outlined to our members in any such process.
- To process any data relating to guarantors as part of the loan conditions.
- To purchase insurance from ECCU Assurance DAC.

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 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”.*

- Assessing a loan application, as well as fulfilling a contract mentioned above, the credit union also utilises credit data from credit referencing agencies. Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use credit scoring information in order to determine suitability for a loan.
- Where there is a breach of a loan agreement, we may use the service of a solicitor or other third parties to recover the debt. Our legitimate interest: The credit union, where appropriate will take necessary steps to recover a debt to protect the assets and equity of the credit union. We will use the best means available to us to contact members who are in breach of a loan agreement, this may include the use of information from public sources to locate a member to seek to recover the debt.
- 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: to provide our members with details on our products and services provided they have not opted out of receiving such communications.

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: www.carrickcu.ie

All documents collected in connection with a loan will be retained until the loan is paid in full 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	Email:	info@carrickcu.ie
Phone:	051-640675	DPO:	dpo@carrickcu.ie