

Privacy Notice of Limavady Credit Union Limited

Our contact details are:

Address: 14-16 Catherine Street Limavady Co. Derry BT49 9DB

Phone: 028 7776 4900

Email limavadycu@btconnect.com

*Data Protection Representative – Data Administrator

Contact 028 7776 4900

Limavady Credit Union is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us.

Purpose of Data Collection, Processing or Use

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.

What personal data do we use?

We may collect, store, and use the following categories of personal information about you:

- Your name, address, date of birth, email, telephone financial data, status and history, 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 Numbers (TIN)/National Insurance numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings.

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

- [Information about your health, including any medical condition, health and sickness (See Insurance for further details)]

We need all the categories of information in the list above to allow us to; identify you, to contact you and in order that we perform 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 information.

If you fail to provide personal information

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

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal 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:

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. See **Insurance** for further details.

Profiling

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

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. We document the reasons for our retention periods and where possible the retention periods themselves in our Retention Policy.

Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

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- CCTV footage which is used in the normal course of business (i.e. for security purposes) for one month. (Unless required for compliance with a legal obligation).
- Evidence of identity checks to be maintained for 5 years after an individual ceases to be a member of the credit union;
- Details of member transactions are maintained for a period of 5 years after an individual ceases to be a member of the credit union;
- Loan application information is maintained for a period of 6 years from the discharge, final repayment or transfer of the loan
- Forms and records will be retained in individual member files for 6 years after the relationship with the member has ended

Planned data transmission to third countries

There are no plans for a data transmission to third countries

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 relationships with us:

Fulfilling contract

This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you

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

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

Irish League of Credit Unions (ILCU) Affiliation: The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as marketing and public affairs representation, monitoring, financial, compliance, risk, learning and development, and insurance services to affiliated credit unions. As this credit union is affiliated to the ILCU, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information in your application or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

The ILCU Savings Protection Scheme (SPS): We may disclose information in any application from you or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS.

The Privacy Notice of ILCU can be found at [www.creditunion.ie/\[To be inserted\]](http://www.creditunion.ie/[To be inserted]):

[This section is currently under review with ECCU given recent changes to national legislation in the UK Parliament implementing the GDPR. Further information will be released in due course]

Insurance : As part of our affiliation with the ILCU the credit union carries insurance products from ECCU Assurance DAC (ECCU) which includes Life Savings (LS) , Loan Protection (LP), Death Benefit Insurance (DBI) and Disability Cover where it applies . To administer these products and services we may pass your details to ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the Irish League of Credit Unions which exists to provide insurance to credit unions affiliated to the Irish League of Credit Unions. It is a term of your membership, by virtue of our affiliation with the ILCU, that the credit union must apply to ECCU for Loan Protection (LP) if you choose to take out a loan with us. If covered 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 deal with insurance underwriting, administration and claims on our behalf. The Privacy Notice of ECCU can be found at [•]. The Privacy Notice of ECCU can be found at [].

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

[Debit or Prepaid Card: If you have a debit, or prepaid card with us, we will share transaction details with companies which help us to provide this service].

Our legal duty

This basis is appropriate when we are processing personal data to comply with UK or Northern Ireland 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 the credit union has certain reporting obligations to HM Revenue and Customers 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. The legal basis upon which we do this is compliance with HM Revenue and Custom's Automatic Exchange of Information standard.

Regulatory and statutory requirements: To meet our duties to regulators (the Financial Conduct Authority (FCA) and the Prudential Regulation Authority ((PRA), 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 share information with certain statutory bodies such as Department for the Economy (DfE), the Financial Services Compensation Scheme (FSCS) and Financial Ombudsman Service (FOS) if required by law.

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you in this membership application will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and associated legislation.

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

Nominations: The Credit Unions (Northern Ireland) Order 1985 (as amended) allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. The credit union must record personal data of nominees in this event.

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: We may share information you have provided to us with credit reference agencies 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, we may check the following records about you:

- (a) our own records;
- (b) 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
- (c) Those at fraud prevention agencies.

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 in order 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.

The searches 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 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 or your partner successfully files for a disassociation with the credit reference agencies to break that link.

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.

Further information about credit reference agencies, and financial connections and how they may be ended, can be obtained from the Credit Reference Agency Information Notice (CRAIN) which sets out how the three main credit reference agencies Callcredit, Equifax and Experian, each use and share personal they receive about you and/or your business that is part of or derived from or used in credit activity. CRAIN is available at the CRAIN website <http://www.experian.co.uk/crain/index.html>.

<p>CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security. [NOTE THE CREDIT UNION MAY HAVE OTHER PURPOSES; IF SO PLEASE SEE OUR GUIDE TO CCTV AS ANY OTHER PURPOSE SHOULD BE VERY WELL CONSIDERED].</p>	<p>Our legitimate interest: With regard to 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.</p>
<p>Voice Recording: We record phone conversations both incoming [AND OUTGOING] for the purpose of verifying information and quality of service [OTHER PURPOSES]</p>	<p>Our Legitimate interest: To ensure a good quality of service, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes.</p>
<p>Your consent</p>	
<p>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 the Irish League of Credit Unions and/ specialist market research companies. See section on Your Marketing Preferences.</p>	
<p>[Art Competition] [This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information and asked for your consent to the processing of personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms. (*This is subject to change)]</p>	
<p>[Schools Quiz] [This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools Quiz is open to entrants aged 4 to 13. Upon entry parent/legal guardians will be given further information and asked for their consent to the processing of their child’s personal data. This information is processed only where consent has been given. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms. (*This is subject to change)]</p>	

Your Marketing Preferences

As part of improving our service to you, from time to time, we would like to inform you of goods, services, competitions and/or promotional offers available from us. We may wish to use different means when sending such marketing communications. Please now indicate by which methods, **if any**, you consent to being contacted by ticking **Yes** to each method of communication below-

	Yes
Post	<input type="checkbox"/>
Email	<input type="checkbox"/>
Text	<input type="checkbox"/>
Landline call	<input type="checkbox"/>
Mobile call	<input type="checkbox"/>

Signature of applicant	
Date:	DD MM YYYY
<p>You have a right to notify us free of charge at any time of your right to refuse such marketing by writing to [INSERT CONTACT DETAILS] or by using the "opt-out" options in any marketing message we send you.</p> <p>Please contact us directly should you wish to change or withdraw your consent.</p>	

[Note to Credit Union, this consent, where completed, should be recorded?]

Receipt of obligatory notices by email

There are certain notices that credit unions are obliged to provide from time to time. Please provide your email address if you would like to receive these obligatory, **non-marketing** communications by email (for example notice of the Annual General Meeting). This will assist the Credit Union in reducing its carbon foot print and will also reduce costs.

Email address:

Please note that we maintain the right to contact members by such means as best available to us in relation to a non-performing loan or outstanding debt to the credit union, including by text or email.

Your Rights in connection with your personal information are to:

[Icon to be inserted]¹

- **To find out** whether we hold any of your personal data, **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

¹ Icons to be inserted by ILCU in final version.

	processing.
[Icon to be inserted]	<ul style="list-style-type: none"> • 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.
[Icon to be inserted]	<ul style="list-style-type: none"> • 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 also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
[Icon to be inserted]	<ul style="list-style-type: none"> • 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.
[Icon to be inserted]	<ul style="list-style-type: none"> • Request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.
[Icon to be inserted]	<ul style="list-style-type: none"> • 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.
[Icon to be inserted]	<ul style="list-style-type: none"> • 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.*

You have a **right to complain** to the **Information Commissioners Office (ICO)** in respect of any processing of your data by;
Tel: 028 9027 8757 or 0303 123 1114 **Email:** ni@ico.org.uk
Post: ICO, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB

****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 information, 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 manager in writing using their contact details above.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. Alternatively, we may 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 information 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 meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us at 14-16 Catherine Street Limavady BT49 9DB