

## Privacy Notice of Kanturk Credit Union Limited

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of providing financial services to its members. Data collection & processing are conducted for the purpose of facilitating these objectives. This Privacy Notice is to provide you with information regarding the processing of information about you for account-related purposes, other general purposes and further processing that may be necessary depending on the products and services you avail of.

Our contact details are: Kanturk Credit Union Limited, Credit Union House, Strand Street, Kanturk, Co. Cork.  
Phone: 029-50276 Email: [info@kanturkcu.ie](mailto:info@kanturkcu.ie) Data Protection Contact: [compliance@kanturkcu.ie](mailto:compliance@kanturkcu.ie)

Kanturk 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.

### What personal data do we collect about you?

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

<b>Identity, Contact Data &amp; Personal Information</b>	Name (including any previous names used by you); addresses (current & previous) ; date of birth; email; telephone number; signatures; identification documents & data from identity documents; nationality; accommodation status; residency status; visa information; politically exposed person status; residential status; marital status.
<b>Financial Details/ Circumstances</b>	Credit status and history (including Central Credit Register reports/data); credit assessment records; transaction data; contract data; details of the credit union products you hold with us; income/salary; asset details; occupation; employment details; source of wealth/funds; details about your mortgage and other credit; tax residency details; tax identification number(s); PPS number; bank account details (including IBAN); details of children; bank statements/transactional detail.
<b>Information You Provide About Others</b>	Spouse/partner details; details of any person(s) guaranteeing a loan you get from the credit union; information relating to any dependents you have; details of any person(s) nominated on your account.
<b>Information Created During Your Relationship with Us</b>	Interactions with credit union staff and officers in branch, by phone, or email; current or past complaints; CCTV footage captured at the credit union's office; recordings of telephone calls; transactional data (including: data in relation to lodgements, withdrawals, incoming and outgoing SEPA payments); information in relation to requests made by you e.g. data access, correction, restriction, deletion, data portability and complaints; information provided to us by others about you (e.g. where you guarantee a loan, where you are nominated on a member's account, where you have defaulted on a loan and a third party provides information about you etc.)
<b>Information from Online Activities</b>	<ul style="list-style-type: none"><li>We collect information about your internet activity which can be managed through your internet browser. For detailed information on the cookies we use and the purposes for which we use them, see our Cookies Policy, which is available on <a href="http://www.kanturkcu.ie/cookies">www.kanturkcu.ie/cookies</a></li><li>We collect information about your internet browser settings and Internet Protocol (IP) address and other relevant information to help us identify your geographic location when providing you with our services.</li></ul>
<b>Special Category Data</b>	We may also collect, store and use the following "special categories" of more sensitive personal information: <ul style="list-style-type: none"><li>Information about your health, including any medical condition, health, and sickness (See Insurance for further details);</li><li>Biometric data to perform a liveness test to confirm that you are the person if you join online or update your ID documents online</li></ul> Your transactional data may also possibly include incidental special category data e.g. payments made to trade unions, political parties or religious organisations.

We need all the categories of information in the list above to allow us to identify you, contact you and so that we can administer your account. We also need your personal identification data to enable us to comply with legal obligations.

### 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:

- To open and maintain an account for you.
- To meet our obligations under the credit union's Standard Rules.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligations (e.g. anti-money laundering and beneficial ownership reporting obligations).
- To assess your loan applications and determine your creditworthiness.
- To verify the information provided by you in any application.
- To purchase loan protection, death benefit and life savings protection from ECCU.
- To conduct credit searches and make submissions to the Central Credit Register.
- To administer any loan, including taking steps, where necessary, to recover the loan or enforce any security taken as part of the loan.
- To use credit scoring techniques to either partially or fully assess your application.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- To provide updates on our loan products and services by way of directly marketing to you.

### 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:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policy.
- 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 in their own right<sup>1</sup> or without an appropriate written agreement, and unless we are satisfied that there are appropriate technical and organisations measures in place to secure your data. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised, 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 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 data for an unrelated purpose, 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 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, taking into account 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 Records Retention Policy.

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

- Accounting records shall be retained for 7 years.
- Transactional data & documents are generally retained for a period of 7 years after an account is closed.
- We retain identity & customer due diligence documents obtained in compliance with anti-money laundering legislation for a period of 7 years after an account is closed.
- Loan applications & information, including supporting documents, are retained for a period of 7 years from the date of discharge, final repayment or transfer of the loan.
- Credit agreements are contracts and as such the credit union retains them for 7 years from the date of discharge, final repayment or transfer of the loan, and twelve years where the document is under seal.
- Other membership documentation, forms and data are generally retained for a period of 7 years after an account is closed.
- CCTV footage which is captured in the normal course of business (i.e. for security purposes) is retained for one month.

## Planned data transfers to third countries (outside of the European Economic Area)

There are no plans for data transfers to third countries. Where any such transfers are planned or undertaken appropriate steps will be taken to ensure that they are only done in accordance with model clauses (also known as Standard Contractual Clauses) that ensure that any personal data leaving the EEA will be transferred in compliance with EU data protection law.

## The Legal Bases for Our Processing

We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use your information in accordance with one or more of the following legal bases provided for under GDPR:

### Legal Basis 1: Fulfilling a 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 and/or processing applications you make, and to maintain and administer any accounts you have with the credit union.

**Loan Security:** In order 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.

**Appointing Guarantors:** As part of your loan conditions, we may require the appointment of a guarantor. Your credit agreement and other loan information will be shared with your guarantor. 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.

**Relationship with Trade & Representative Bodies:** The credit union is affiliated to trade and representative bodies for credit unions in Ireland. These organisations provide professional & and business support services such as marketing and public affairs representation, monitoring, financial, compliance, risk, learning and development, and insurance services to credit unions. We may disclose your data to officers of our trade & representative bodies for the purpose of them providing services to us.

**Insurance:** We purchase insurance from a life insurance company. This includes Life Savings (LS), Loan Protection (LP), Death Benefit Insurance (DBI) and optional related riders (where applicable). We may share relevant data about you with our insurers, as required, to avail of cover.

If you choose to take out a loan with us, it is a term of your membership, that the credit union will apply to its life assurance company for LP. This may require us and our life assurance provider to process 'special category' data, which includes information about your health. This information will be shared with our life assurance provider to allow it deal with insurance underwriting, administration and claims on our behalf.

<sup>1</sup> As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.

**Credit Assessment:** When assessing your application for a loan, we will take a number of factors into account & will utilise personal data provided from:

- your application form or as part of your loan supporting documentation, and;
- your existing credit union file, and;
- the Central Credit Registrar

The credit union utilises this information to assess your loan application in line with the applicable legislation and the credit union's lending policies.

**Member Service:** We may use information about your account to help us improve our services to you.

## Legal Basis 2: Legal Duty

This basis is appropriate when we are processing personal data to comply with Irish or EU Law.

**Notifications:** There are a number of notifications that we are required to send to you by law, including notice of the annual general meetings of the credit union and statements of account where you have not opted to access these online. We engage the services of professional printing/ mailing companies to assist in this and may share your personal data with them.

**Reporting Tax Liabilities & Status:** We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction and/or your tax status, in accordance with legal requirements.

**Regulatory and Statutory Requirements:** To meet our duties to regulators we may allow authorised officers of regulatory agencies 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 personal data with other statutory bodies if required under law.

**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 law. This may include filing statutory returns with your data to various beneficial ownership registers. These reporting obligations require the credit union to submit certain member data to the relevant authority administering the registers. For further information, please contact the credit union directly. We are also required to conduct regular screening of members to establish whether any members are or have become financially sanctioned or politically exposed persons.

**Audit & Assurance:** To meet our legislative & regulatory duties to maintain audited financial accounts, we appoint an External Auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes. We are also required to appoint an Internal Audit Function who shall have access to the records of the credit union and its members. Other assurance functions required by law may be outsourced by the credit union, and, in such cases, your data may be processed by those outsourced service providers.

**Nominations:** Credit Union legislation allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. Where a member makes a nomination the credit union must record the personal data of nominees.

**Credit Reporting:** We process your data to complete credit checks on you when you apply for a loan, and also submit your loan data, including details of your credit agreements with us and loan performance data to the relevant credit agency.

**House Loans (Mortgages):** Where you obtain a house loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf.

**Connected/Related Party Borrowers:** Under Central Bank regulations we are obliged 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 credit union's Board/Management Team or a member of the Board/ Management Team's family, or a business in which a member of the Board /Management Team has a significant shareholding.

## Legal Basis 3: 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.

Processing Activity	Legitimate Interest
<b>Credit Assessment and Credit Reference Agencies:</b> When assessing your application for a loan the credit union utilises credit data from the Central Credit Registrar	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.
<b>Debt Collection:</b> 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, your indebtedness and other identifying information so that they can make contact with you and recover the outstanding sums. Information provided to us by third parties when we are trying to seek recovery of your loan may be recorded on your account.	The credit union has a legitimate interest in taking all necessary steps to recover a debt to protect the assets of the credit unions and the interests of the credit union's members.
<b>Voice Recordings:</b> We may record phone conversations that occur by telephone between the credit union and its members.	Calls may be recorded 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. Members will be advised when this is occurring.
<b>Market Research &amp; Data Analytics:</b> We may undertake market research and/or data analytics from time to time. This may include using specialist market research companies.	Such research and analysis helps the credit union to develop strategy, undertake statistical analysis, and assess current and future Credit Union financial performance.

<b>CCTV:</b> We have CCTV installed on the premises with clearly marked signage. The purpose of this is for security, public safety and the prevention of fraud.	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, and to prevent and detect fraud.
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#### Legal Basis 4: Your consent

We will only carry out the below processing when we have obtained your consent and will cease processing once you withdraw such consent.

**Marketing :** We may communicate with you about the products and services offered by the credit union. We will typically only send you marketing communications where we have obtained your consent to do so and in accordance with your specific preferences, but there may be times where we rely upon legitimate interests for such communications. Regardless of the legal basis for sending a marketing communication members will always be provided with an opportunity to opt-out of all such communications. You can withdraw marketing consent provided by you at any time by unsubscribing to marketing in the communications sent to you or by contacting us at [info@kanturkcu.ie](mailto:info@kanturkcu.ie). We may ask you to update your marketing preferences periodically to ensure that your preferences are up to date (e.g. when you apply for a loan).

**Cookies:** Your consent is required to the use of cookies and other forms of tracking technology when interacting with us or using our website (unless the cookies are necessary for the operation of the webpage). Please see Kanturk Credit Union's Cookies Policy on our website for further information.

#### Sharing Your Personal Data

We only share your information with a select number of individuals and companies, and only as necessary.

Category of Recipient or Scenario	Details
Any Person Authorised by You	<p>These include:</p> <ul style="list-style-type: none"> <li>▪ If you open or hold a joint account with us, the other party to the account;</li> <li>▪ Any person that has guaranteed your loans from the credit union;</li> <li>▪ Any attorney appointed under a Power of Attorney to manage your affairs or any person appointed by you and/or the Decision Support Service to assist you in managing your affairs under a relevant arrangement;</li> <li>▪ Other credit unions if you decide to transfer your account from our credit union to their credit union;</li> <li>▪ Any other party authorised by you to receive your personal data/other parties you ask us to share your data with.</li> </ul>
Third parties we need to share your information with in order to manage your relationship with us and/or facilitate services you request	<ul style="list-style-type: none"> <li>▪ In administering your account, we will share your information with our IT service providers, including <i>Progress Systems Limited</i> and <i>Intuity Technologies Limited</i>. In addition to these core IT service providers your personal data may be processed and backed up using services provided by blue-chip companies such as <i>Microsoft</i> and <i>Datto</i>.</li> <li>▪ To provide you with SEPA payment services (e.g. credit transfers and direct debits) we will share your data with payment service providers, such as banks and other credit unions, to facilitate your payment instructions. Additionally, the credit union will share your data with <i>PAYAC Services CLG</i>, <i>Intesa Sanpaolo SA</i> &amp; <i>Danske Bank A/S</i> when providing you with these services. These 3<sup>rd</sup> parties provide administrative &amp; clearing services that facilitate SEPA payments for members by our credit union.</li> <li>▪ We provide members with the option to avail of Account Information Services during loan applications. This is facilitated by <i>Truelayer (Ireland) Limited</i>, who will act as data controllers and obtain your explicit consent to process your data for this service.</li> <li>▪ When processing your loan applications, we use a credit assessment &amp; loan management software that stores your data and is provided by <i>Graphical Financial Analysis Limited</i>.</li> <li>▪ If you apply for a mortgage with us, we may share your data with <i>CU Mortgage Services DAC</i> &amp; other companies that provide us with mortgage support, origination &amp; management services.</li> <li>▪ If you buy or sell foreign currency with us, we have an agency agreement in place with <i>FEXCO Unlimited Company</i>, who will process your data to facilitate any such transactions.</li> <li>▪ We may share your data with subsidiaries of the <i>Irish League of Credit Unions</i>, including <i>The ILCU Savings Protection Company CLG</i> and the ILCU's life assurance company, <i>ECCU Assurance DAC</i>.</li> </ul>
Statutory and regulatory bodies	<ul style="list-style-type: none"> <li>▪ Where a member is tax resident in another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will exchange this information with the jurisdiction of tax residence of the member. Under the Return of Payments Regulations credit unions are obliged to report details to Revenue in respect of dividend or interest payments to members, which include your PPSN, where held. We have to report certain transactional data to Revenue under the European Union Cross-Border Payments Reporting.</li> <li>▪ We may share your data with the Central Bank of Ireland and its officers, if required to do so by law. In particular, where a loan applied for is €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the applicant. Where a loan is granted to 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. The CCR is managed by the Central Bank.</li> <li>▪ We file returns detailing certain member &amp; account information around beneficial ownership to: <ul style="list-style-type: none"> <li>○ The Central Register of Beneficial Ownership of Companies and Industrial and Provident Societies, which is administered by the Companies Registration Office,</li> <li>○ The Central Register of Beneficial Ownership of Trusts, which is administered by the Revenue Commissioners, and;</li> <li>○ The Ireland Safe Deposit Box and Bank Account Register, which is administered by the Central Bank of Ireland.</li> </ul> </li> <li>▪ We may share your personal data with certain statutory bodies such as An Garda Síochána, the Data Protection Commissioner, the Department of Finance, the Department of Social Protection and the Financial Services &amp; Pensions Ombudsman, if required to do so to comply with a legal obligation or in line with another legal basis for processing.</li> <li>▪ Financial sanctions and politically exposed person screening is carried out through a combination of in-house checks and independently by <i>BPSG Ltd trading as StubbsGazette</i>.</li> </ul>
Audit & Assurance Providers	<ul style="list-style-type: none"> <li>▪ We share your data with our external auditor, internal audit function and other outsourced assurance providers, as required.</li> </ul>

Category of Recipient or Scenario	Details
Third Parties we engage to protect our legitimate interests	<ul style="list-style-type: none"> <li>We may share your personal data with marketing agencies to assist us in delivering our marketing communications.</li> <li>We may share your data with <i>RW Pierce (Ireland) Limited</i>, who assist us in completing ongoing analysis of our common bond area, which is the geographic area in which we operate. Analytics are only carried out by RW Pierce on effectively anonymised data.</li> <li>We may share your transactional data with <i>Nexi S.p.A</i>, who provide us with fraud detection software and support services for electronic payments.</li> <li>We may engage the services of debt collection agencies, tracing agents and other similar providers to assist us in recovering a loan that is in arrears.</li> <li>The <i>Irish League of Credit Unions (ILCU)</i>, a trade &amp; representative body for Irish credit unions, provides professional &amp; business support services to affiliated credit unions. As this credit union is affiliated to the ILCU, we must operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by). We may disclose information to authorised officers of the ILCU for the purpose of them providing these services to us.</li> </ul>

### Your Rights in Connection with Your Personal Information

As a data subject you have the right to:

- Find out whether we hold any of your personal data, and if we do, to request access to that data and to be furnished a copy of that data. You are also entitled to request further information about the processing.
- 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.
- 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).
- 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.
- Request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.
- Where we are processing your data based solely on your consent you have the right to withdraw that consent at any time 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.

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

<b>Telephone</b> +353 57 8684800 +353 (0)761 104 800 <b>Lo Call Number</b> 1890 252 231 <b>Webform</b> <a href="http://www.forms.dataprotection.ie">www.forms.dataprotection.ie</a>	<b>Postal Address:</b> <b>Data Protection Commissioner,</b> <b>21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland</b>
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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 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 readable format please email [compliance@kanturkcu.ie](mailto:compliance@kanturkcu.ie)

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 meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal information.

### Information You Provide Us About Others

If you give us information about someone else (for example, information about a nominee for the property in your account or information about a politically exposed person with whom you are related) we will use it in the ways described in this Data Privacy Notice. Before you disclose information to us about another person, you should be sure that you have their agreement to do so. You should also show them this Data Privacy Notice. You need to ensure they confirm that they know you are sharing their personal information with us for the purposes described in this Data Privacy Notice. We may also share this Privacy Notice directly with them.