



WHAT IS GDPR?

GDPR is General Data Protection Regulation which comes into effect on 25th May 2018. The objective of GDPR is to strengthen the protection of personal data for EU citizens, and to standardize the regulations across the EU.

WHO ARE HSSCU?

Health Services Staffs Credit Union Ltd. are one of the largest credit unions in Ireland. We are affiliated with the Irish League of Credit Union (ILCU). Our offices are in the following locations:

Dublin

- HSSCU, 5 High St., Christchurch, Dublin 8
- HSSCU, Phoenix View, 144-150 James's Street, Dublin 8
- HSSCU, 5-6 The Triangle, Ranelagh, Dublin 6

Cork

- HSSCU, St. Gabriel's Branch, 34 St. Patrick's Quay, Cork

Galway

- HSSCU, Mayoralty House, Merchants Road, Galway

Louth

- HSSCU, Clarke Station, Dundalk, Louth

Email: dpo@hsscu.ie | TEL: 016778648 1890 677864 | www.hsscu.ie



WHAT PERSONAL DATA DO WE COLLECT?

The following categories of personal data may be collected, retained and processed by HSSCU, including in some cases verification of the personal data:

Name, Address, Previous Addresses, Date of Birth, Email, Phone number, PPSN or Tax Identification Number, Identification documents such as passport/driver's licence and proof of address, Signatures, Tax Residency, Politically Exposed Status; Financial Data such as accommodation status/mortgage details, payslips, salary information, source of wealth and source of funds; details of the credit union products you hold with us including transaction data and history; interactions with credit union staff and officers in premises, by phone and email, complaints, CCTV footage and telephone voice recordings, nominations and spouse/partner details (by consent).

WHAT SPECIAL CATEGORIES OF DATA DO WE COLLECT?

“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.

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.

As part of our service to members, we provide insurance which we purchase from ECCU Assurance DAC, (ECCU). This is a life insurance company, wholly owned by ILCU. This includes Life Savings (LS), Loan Protection (LP). If you chose to take a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process ‘special category’ data, which **includes information about your health**. This information will be



shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf. If you opt for Payment Protection Insurance, we will be required to share your information with CUNA also.

WHAT LAWFUL BASIS DO WE HAVE FOR PROCESSING PERSONAL DATA?

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 this information for the following purposes:

	<p>Fulfilling contract This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you such as membership, the provision of loans, the provision of mortgages, electronic transfers and insurance.</p>
	<p>➤ 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</p>
	<p>➤ 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. This will be a requirement on a mortgage loan.</p>
	<p>➤ 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</p>
	<p>➤ 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</p>
	<p>➤ 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 HSSCU Ltd. 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</p>



membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

➤ **Electronic Payments:** For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), HSSCU is a participant of CUSOP (Payments) DAC ("CUSOP"). CUSOP is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. CUSOP is an outsourced model engaging third part companies such as a Partner Bank, to assist with the processing of payment data.

➤ **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



Legal Duty This basis is appropriate when we are processing personal data to comply with an Irish or EU 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 Revenue 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. Under the "Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008" credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.

➤ **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. 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 the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland if required by 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 obligations under The Money Laundering provisions of



<p>the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013.</p>
<p>➤ 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.</p>
<p>➤ Nominations: The Credit Union Act 1997 (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. Where a member wishes to make a nomination, the credit union must record personal data of nominees in this event.</p>
<p>➤ Purpose of the loan: We are obliged to ensure that the purpose for the loan falls into one of our categories of lending.</p>
<p>➤ 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 [and guarantor shortly] to the CCR.</p>
<p>➤ House Loan: 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.</p>
<p>➤ Connected/Related Party Borrowers: 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.</p>



Legitimate Interest 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 below

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 Irish Credit Bureau (ICB) and the Central Credit Registrar (CCR)

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

ICB are using **Legitimate Interests** ([GDPR Article 6 \(f\)](#)) as the legal basis for processing of your personal and credit information. These Legitimate Interests are promoting greater financial stability by supporting a full and accurate assessment of loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention. Please review ICB's Fair Processing Notice which is available at [http://www.icb.ie/pdf/Fair Processing Notice.pdf](http://www.icb.ie/pdf/Fair%20Processing%20Notice.pdf). It documents who they are, what they do, details of their Data Protection Officer, how they get the data, why they take it, what personal data they hold, what they do with it, how long they retain it, who they share it with, what entitles them to process the data (legitimate interests), what happens if your data is inaccurate and your rights i.e. right to information, right of access, right to complain, right to object, right to restrict, right to request erasure and right to request correction of your personal data.

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 make contact with you and details of the indebtedness in order that they recover the outstanding sums.

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

Judgements Searches: We carry out searches in Stubbs Gazette in order to assess your credit worthiness to repay a loan.

Our Legitimate interest: 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. In carrying out such a search we can better determine your overall financial position in order to lend to you.

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

Our Legitimate interest: 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 and to prevent and detect fraud.

Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, quality of service and consents

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 resolves any disputes.

Your Consent We will only carry out processing which is based on your consent and will cease processing if/when you withdraw your consent.



Sometimes we need your consent to use your personal information. With **direct marketing** for example, we need your consent to make you aware of products and services which may be of interest to you. We may do this by phone, post, email, text or through other digital media. You can decide how much direct marketing you want to accept when you apply for new products and services. If we ever contact you to get your feedback on ways to improve our products and services, you have the choice to opt out.



HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR?

Record	Retention Period
Membership Application	7 Years after relationship has ended
Nomination Forms	7 Years after relationship has ended
CCTV recording	One Month
Copies of ID Proof of Address	5 Years after relationship has ended
Loan application forms	7 Years from breach, satisfaction or expiration
Loan Supporting Documentation	7 Years from breach, satisfaction or expiration
Credit Agreements	7 Years from breach, satisfaction or expiration
ICB checks	5 Years from date of receipt
CCR Enquiry	5 Years from date of access
Rescheduled Loan Request	7 Years
Temporary Arrangements	7 Years
Guarantees	7 Years from the date of default
Lodgement/Withdrawal documents	5 Years
Member Complaints	6 Years after the complaint has been resolved
Insurance Product Sale Documentation	6 Years
Loan Protection/Life Savings Claims Documentation	6 Years after the relationship has ended
Declaration of Health Forms	Until loan is repaid or a new DOH completed and approved

WHAT RIGHTS TO I HAVE OVER MY PERSONAL DATA UNDER GDPR?



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 information. 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 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 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 data for direct marketing purposes.



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



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.**



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.*

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. We only permit them to process your personal data for specified purposes and in accordance with our instructions. The recipient of the information will also be bound by confidentiality obligations. We are required to share personal data with certain 3rd parties such as Central Credit Register, Revenue.



WHAT IF I DON'T WANT TO SHARE CERTAIN PIECES OF 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 as we may be prevented from complying with our legal obligations. One of the principles of GDPR is Data Minimisation, whereby we only ask for what we need to carry out a service or provide a product for you, so when we do ask for personal data, it is in order to provide you with a product or service.