



## Social Media Privacy Notice

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.

### Credit Union Contact Details

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 HSSCU, St. Gabriel's Branch, 34 St. Patrick's Quay, Cork HSSCU, Mayoralty House, Merchants Road, Galway HSSCU, Clarke Station, Dundalk, Louth HSSCU, 7 Sexton Street, Limerick	<b>Tel:</b> 01 6778648 / 1890 677864  <b>Website:</b> <a href="http://www.hsscu.ie">www.hsscu.ie</a>
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### Data Protection Officer Contact Details

Health Services Staffs Credit Union Limited St Gabriel's Branch 34 St Patrick's Quay Cork	<b>Tel:</b> 01 6778648 / 1890 677864  <b>Email:</b> <a href="mailto:dpo@hsscu.ie">dpo@hsscu.ie</a>
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Health Services Staffs Credit Union is committed to protecting the privacy and security of your personal data. This notice is so that we provide you with information around the use of your data when engaging with us through social media.

### The purposes for which we use your personal data

We use your personal data to assist it in carrying out the following:

- Communicate with and carry out requests from visitors to our social media channels;
- Understand how visitors are engaging with us via social media;
- Learn which posts or activities create the most engagement and from these interactions, develop relevant content and features likely to be interesting to our visitors
- Receive feedback on our products and services so we can work on improvements to these.

### Legal basis for processing of personal data

We operate social media channels so that we can present, inform, and interact with our members and other visitors interested in our services. This involves analysing in aggregated form the reach and use of our social media channels by such visitors. The legal basis for which we rely on to process personal data is our legitimate interests in optimising our engagement and communication of our business activities to our members and other interested parties.



## HSSCU on Facebook

The HSSCU Facebook fanpage is operated by Facebook Ltd., 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland ("Facebook"). When you visit our fanpage, Facebook processes your personal data in accordance with their privacy policy which can be found [here](#).

### What personal data do we process?

We process following categories of personal data about you:

- Your Facebook username as well as comments, videos and images posted on our fanpage and messages you send us via our page. Where we create content such as filming of interviews or which includes reviews of our services, this is done by way of consent.
- Your activity on our fanpage via the service, Facebook Page Insights, e.g. the visits to our site, demographics and location of our visitors, when fans of our page are online. This statistical information is provided to us in an anonymised format and does not reveal individual user details.
- Other information that is necessary to complete requests from visitors to our fanpages.

## Joint controllership with Facebook

To provide us with information about the visitors to our page, Facebook uses cookies and other tracking technologies, and this data is then provided through services like the Page Insights service referenced above. (More information about Facebook Insights can be found [here](#). For information on how Facebook uses cookies and similar technologies, see its [Cookies Policy](#)).

When it comes to Facebook Insights data, HSSCU and Facebook are regarded as 'joint controllers' and have therefore entered into a Joint Controller agreement to set out our respective responsibilities under GDPR.

This joint controller agreement is available [here](#). Facebook assumes primary responsibility for the processing of Insights data and as part of this, requests for information and the exercise of other rights of data subjects will be addressed directly by Facebook. You can contact the DPO of Facebook at the following [link](#).

In so far as it relates to the processing of Insights data, should you contact us to exercise your rights under the GDPR, we will forward your request to Facebook, who will respond to enquiries in accordance with their obligations under the agreement. We are not authorized to act or answer on Facebook's behalf.

The events logged by Facebook to create Page Insights are solely defined by Facebook and cannot be set or changed by us. Outside of the processing of personal data mentioned in this privacy notice, we have no influence on the processing of personal data in connection with your use of Facebook.

### Right to object

You can object to the collection of your data via Facebook's use of cookies and trackers through settings on your [Facebook Account](#). Facebook provides further guidance on its website such as what influences the ads you see (click on the following [link](#)) and how to opt out (click on this [link](#).)

You can prevent the processing of information using the cookies and other technologies that Facebook places on your device by adjusting your browser settings to disable third-party cookies or Facebook cookies.

## HSSCU on Instagram

The HSSCU Instagram page is operated by Facebook Ltd., 4 Grand Canal Square, Grand Canal Harbour, D2 Dublin, Ireland ("Facebook"). When you visit our Instagram page, Instagram processes your personal data in accordance with their privacy policy which can be found [here](#).



### What personal data do we process?

We process the following categories of personal data about you:

- Your Instagram username as well as comments and images posted on our page and messages you send us via our page.
- Your activity on our pages via the service, Instagram Insights, e.g. the visits to our site, demographics and location of our visitors. This statistical information is provided to us in an anonymised format and does not reveal individual user details.
- Other information that is necessary to complete requests from visitors to our page.

### HSSCU on Twitter

The HSSCU Twitter account is operated by Twitter International Company, 1 Cumberland Place, Fenian Street, Dublin 2. When you visit our Twitter account, Twitter processes your personal data in accordance with their privacy policy which can be found [here](#).

### What personal data do we process?

We process the following categories of personal data about you:

- Your Twitter username as well as comments and images posted on our account and messages you send us.
- Your activity on our account via the service, Twitter Analytics, e.g. the visits to our account, demographics and location of our visitors. This statistical information is provided to us in an anonymised format and does not reveal individual user details.
- Other information that is necessary to complete requests from visitors to our page.

### Right to Object

When you are logged into your Twitter account, you can manage your privacy settings and other account features [here](#) at any time. You can contact the DPO for Twitter at the following [link](#).

### HSSCU on LinkedIn

The HSSCU LinkedIn page is operated by LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2. When you visit our LinkedIn page, LinkedIn processes your personal data in accordance with their privacy policy which can be found [here](#).

### What personal data do we process?

We process the following categories of personal data about you:

- Your LinkedIn as well as comments and images posted on our account and messages you send us.
- Your activity on our account via the service, LinkedIn Page Insights, e.g. the visits to our account, demographics and location of our visitors. This statistical information is provided to us in an anonymised format and does not reveal individual user details.
- Other information that is necessary to complete requests from visitors to our page.

### Joint controllership with LinkedIn

To provide us with information about the visitors to our page, LinkedIn uses cookies and other tracking technologies, and this data is then provided through services like Page Insights service referenced above. (More information on its Cookie Policy can be found at the following [link](#)).



When it comes to LinkedIn Insights data, HSSCU and LinkedIn are regarded as 'joint controllers' and have therefore entered into a Joint Controller agreement to set out our respective responsibilities under GDPR.

This joint controller agreement is available [here](#). LinkedIn assumes primary responsibility for the processing of Insights data and as part of this, requests for information and the exercise of other rights of data subjects will be addressed directly by it.

In so far as it relates to the processing of Insights data, should you contact us to exercise your rights under the GDPR, we will forward your request to LinkedIn, who will respond to enquiries in accordance with their obligations under the agreement. We are not authorized to act or answer on their behalf.

The events logged by LinkedIn to create Page Insights are solely defined by it and cannot be set or changed by us. Outside of the processing of personal data mentioned in this privacy notice, we have no influence on the processing of personal data in connection with your use of LinkedIn.

### **Right to object**

You can object to the processing of your data via LinkedIn's use of cookies and trackers by contacting LinkedIn through the following [contact page](#). LinkedIn provides further guidance on its website on how you can exercise your data subject rights through the following [link](#).

## **HSSCU on YouTube**

The HSSCU YouTube channel is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4. When you visit our YouTube channel, Google processes your personal data in accordance with their privacy policy which can be found [here](#).

### **What personal data do we process?**

We process the following categories of personal data about you:

- Your YouTube username as well as comments, videos and images posted on our account and messages you send us. Where we create content such as filming of interviews, this is done by way of consent.
- Your activity on our account via the service, YouTube Analytics, e.g. the visits to our account, demographics and location of our visitors. This statistical information is provided to us in an anonymised format and does not reveal individual user details.
- Other information that is necessary to complete requests from visitors to our page.

### **Right to Object**

YouTube provides guidance on its website for subscribers within your individual settings on how to control your data in YouTube such as your location history, ads personalisation etc. You can also review your privacy settings and manage your data and personalisations by visiting your Google Account. Google provides further help guidance at the following [link](#)

## **How we keep your data secure?**

The security of your data is important to us and we follow a range of technical and organisational measures to control and safeguard the use of your information. These include but are not limited to controlling access to the channels so in this instance, staff authorised to process data is limited to those required to do so in the performance of their duties e.g. Marketing, IT Support; training of staff on data protection, to include data management and the required controls in place; regular audits of our means of work to ensure that our measures remain appropriate and are complied with.



## **Retention Period**

Public messages posted to our various social media forums are viewable and can be searchable by anyone. These are not deleted by us, unless the content is not in accordance with generally accepted standards of use e.g. contains spam, contains content that may be deemed offensive or threatening etc.

Direct Messages sent to us directly via social media channels are deleted at least 12 months after the enquiry has been responded to by us and no other grounds exist that warrant an extension of retention of such messages.

We do not use these channels to actively seek personally identifiable information and to protect your privacy, encourage users to not provide identifying details or sensitive information in comments to the sites or messages to us.

We have no control over the storage duration of your data that is stored by the social media operators for their own purposes. Please refer to their privacy policies for further details.

## **Transfers to Third Countries**

We process data within the EEA. Should we require to transfer data outside of the EEA, we will take legally required steps (to include the use of Standard Contractual Clauses) to make sure that appropriate safeguards are in place to protect your personal information.

Please note that the use of the social media platforms may also involve data processing operations of the platform to third countries such as the USA and who in such instances, rely on legal provisions such as European Commission's adequacy decisions on countries outside the EEA for data transfer and model contract clauses. Please refer to their privacy policies for further details.

## **Updates to this notice**

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website at [www.hsscu.ie](http://www.hsscu.ie) or you can ask us for a copy



**Your Rights in connection with your Personal Data:**



**To find out** whether we hold any of your personal data and **if we do to request access** to that data by being 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.*

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***Please note that the above rights are not always absolute and there may be some limitations***



## Exercising Your Rights

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 or a third party a copy your relevant personal data in a reusable format, please contact our Data Protection Officer in writing using their contact details set out at the beginning of this document. (In some instances, depending on the nature of your request, we may have to forward your request to the relevant social media provider as set out earlier in this document. We will advise you if this is the case).

[You can also exercise your rights by calling into your local branch or telephoning us on 1890 677864.](#)

**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.

## Making a Complaint

If you have a complaint about the use of your personal information, please let a member of staff in your branch know, giving them the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated.

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

<p>Telephone +353 57 8684800 +353 (0)761 104 800 Lo Call Number 1890 252 231 E-mail <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a></p>	<p>Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois</p>
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