



'Personal Lending' 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 for the purpose of facilitating the abovementioned objectives. This notice is so that we provide you with information around the use of your data for lending or lending related purposes. This incorporates all loans provided by the credit union, including an overdraft facility on your current account.

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

Tel: 01 6778648 / 1890 677864

Website: www.hsscu.ie

Data Protection Officer Contact Details

Health Services Staffs Credit Union Limited
St Gabriel's Branch
34 St Patrick's Quay
Cork

Tel: 01 6778648 / 1890 677864

Email: dpo@hsscu.ie

Health Services Staffs 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 use?

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

- Your name, address, date of birth, marital status, nationality, proof of identification and address documents, staff number, email, telephone, signature, source of funds, salary/income, occupation, employer, number of dependents, accommodation status, mortgage details, previous addresses, spouse, partners, Tax Identification/PPSN numbers, transaction data; contract data, details of the credit union products you hold with us, financial data, status and credit history, financial information such as outgoings, details from credit reference agencies on other loans/debts held by you, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings and member account number. When you apply for a loan online, we collect additional personal data such as username or log data such as time and date of loan applications.
- **Additional Information required for home loans as follows:** Valuation reports, Land Registry folio, Certificate of Title, Life Assurance cover documents – these documents contain the following information – Name, Address, date of birth, property value, member's solicitor's name, address and contact details and medical data. Source of Funds. Personal legal documents such as Separation/Divorce Agreements (if applicable), Confirmation of Gift letter (if applicable). Salary certificate completed by Employer. Where self-employed, tax clearance certification, audited accounts, Revenue Notice of Assessments, Business bank account statements. (There is a separate privacy notice available on our website in relation to personal information we process for mortgage applications).



- We may also collect, store and use ‘special categories’ of more sensitive personal information including information about your health, any medical condition and sickness (see Insurance for further details)

We need all the categories of information in the list above to allow us to: identify you, contact you, comply with our legal obligations and in order to perform our contract of providing financial services to you.

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:

- Assessing your loan application* and determining your creditworthiness for a loan. (*Loan applications include applications for an overdraft facility on your current account)
- Verifying the information provided by you in the application.
- We are obliged to purchase loan protection and life savings protection from ECCU.
- Should you opt to purchase payment protection insurance, in the event of a claim, information about your health (‘special category’ data) will be shared with CUNA Mutual Group Services (Ireland) Limited to allow it deal with administration of the claim.
- Conducting credit searches and making submissions to Irish Credit Bureau (prior to 1st October 2021) and the Central Credit Register.
- Administering the loan or overdraft facility, including where necessary, steps to recover the loan or overdraft facility or enforce any security taken as part of the loan.
- We may use credit scoring techniques and other automated decision-making systems to either partially or fully assess your application. Where we use automated decision-making, we use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your organisation. When you apply for a loan, we use data from different sources to look at your ability to repay the loan. We also use information provided by your and information from third parties such as credit reference agencies. The information we process for automated lending decisions includes Income, financial statements, transaction history, salary, spending and bills, credit rating, other loans held by you.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and services by way of directly marketing to you.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

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:

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.

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. (As a data controller, the organisations will be required to provide you with a separate privacy notice setting out what it does with its 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 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 provisioning and 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 Retention Policy.

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

- **Credit agreements** are contracts and as such the credit union retains them for seven years from date of discharge, final repayment or transfer of the loan, and/or thirteen years where the document is under seal.
- **Letter of Sanction** is a letter which is issued to you on approval of an overdraft facility and sets the terms and conditions of that facility. The credit union retains them for seven years from the date of termination of the overdraft facility.
- **Loan applications** form part of the credit agreement, for which you have provided a guarantee and as such we retain them for seven years from date of discharge, final repayment, transfer of the loan. This can be extended to thirteen years where it involves a home loan. **Overdraft Applications** are retained for seven years from termination of overdraft agreement. **Loan and Overdraft assessment documentation** (e.g., bank statements, payslips etc) will be retained in conjunction with the loan / overdraft application and credit agreement for the same time periods to ensure the assessment was conducted appropriately.

Please note that these retention periods are our policy but are also subject to legal, regulatory, and business requirements, which may require us to hold the information for a longer period. For example, we must meet minimum retention standards for our Anti Money Laundering requirements. External agencies, such as the Gardai in specific circumstances can request we retain data for longer than our internal schedules.

Planned data transmission to third countries

We will only transfer your information outside of the EEA where the same standard of data protection applies, or appropriate safeguards are in place. This may include transfers to countries approved by European Commission as having an adequate level of protection and/or use of appropriate safeguards such as Standard Contractual Clauses or Binding Corporate Rules.



Cookies

When using our website or mobile application, we may collect information about your computer, including where available your IP address, operating system, and browser type, for system administration, to help us provide a better service, to record session information and/or to assist you in browsing the website. This may in some instances only be statistical data about how you browse our website. Some of the cookies we use are essential for the website to operate.

Third parties such as Facebook may use cookies, web beacons, and other storage technologies to collect or receive information from our website/app and elsewhere on the internet and use that information to provide measurement services and target ads.

For more information on Cookies and how you can manage them, please see our Cookies Policy on our website on the 'Cookie Declaration' page. You may also learn more about third party services we use in our 'Privacy Policy – Website' page.

Websites & External links

Our website contains links to other websites. The inclusion of a link on this website does not imply endorsement of the linked website by us. We are not responsible for the content or privacy practices of any third parties or other websites. We encourage you to read the privacy statements and/or policies on other websites you visit to familiarise yourself with how your personal data is processed.

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. We will typically collect and use this information for the following purposes:



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

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.

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.

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, guidance, 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

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

Insurance: As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable).

If you choose to take out 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.

Payment Protection Insurance: We purchase insurance from CUNA Mutual Group Services (Ireland), who in respect of lending, provide payment protection insurance. If you choose to take out a loan with us, you can opt to avail of this payment protection insurance. In order that we apply this, it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with Cuna Mutual to allow it deal with insurance underwriting, administration and claims on our behalf.

Credit Assessment: When assessing your application for a loan (which includes an overdraft facility), the credit union will take several factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation.
- your existing credit union file,
- credit referencing agencies such as the Irish Credit Bureau (prior to 1st October 2021) and the Central Credit Registrar
- publicly available information obtained from providers such as Vision Net.

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit union's lending policy. We sometimes use automated decision making to improve the efficiency of our processes. The assessment is done in accordance with our internal credit assessment rules to and is subject to human intervention and oversight to ensure its application is fair.

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

Home Loans: To maintain and administer home loans, we will need to share your information with our solicitors, Piense Fitzgibbon Solicitors, so that they may provide legal services to us.



Legal Duty



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

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, 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 personal data 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 and appropriate Supervisory Authority if required under law.

Purpose of the loan: We are obliged to ensure that the purpose for the loan falls into one of our categories of lending.

Compliance with our anti-money laundering (AML) and combating terrorist financing (CTF) 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 the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended and any subsequent AML and CTF legislation.

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

Credit Reporting: Where a loan (which includes an overdraft facility) 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 (which includes an overdraft facility) 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 to the CCR.

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.

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 team's family or a business in which a member of the Board /Management Team has a significant shareholding.

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: When assessing your application for a loan (which includes an overdraft facility), 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 Central Credit Registrar. (See *legal duty* noted previously) and prior to 1st October 2021 the Irish Credit Bureau (ICB).

ICB searches will no longer take place after 1st October 2021. Applications prior to this may have been subject to an ICB search

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 credit facility 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 used **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.

Debt Collection: Where you breach the loan agreement or overdraft facility, 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 contact you and details of the indebtedness in order that they recover the outstanding sums.

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

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

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, the prevention, and detection of fraud and to ensure accuracy of member transactions.

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, to prevent and detect fraud and to ensure accuracy of member transactions.

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

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

The processing of your personal data with your consent, as follows:

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. We may wish to use different means when sending such marketing communications. Your consent is sought in advance to 'opt in' to receive such communications. You have a right to notify us free of charge at any time that you wish to refuse such marketing by writing to us at our address at the top of this document or by using the "opt-out" options in any marketing message we send you. Please contact us directly should you wish to change or withdraw your consent.

Information on online activity

If you use our website, we may collect information about your online activity using technology known as cookies. Cookies are stored on your browser or hard drive of your computer and provide us with information to help us improve our website and deliver better services. They can be controlled through our cookie consent banner and/or through our 'Cookie Declaration' web page. (Please note some cookies are essential for the website to operate and so your consent is not required for these, but these



are also clearly set out in our cookie consent banner and 'Cookie Declaration' web page so you may distinguish them from other categories).

We also use third-party providers to aid us in the promotion and delivery of our services to you. These are, where applicable, set out within the information notices referenced above but also on our 'Privacy Policy – website' web page, which explains further what services we use and provides links on ways you can manage your engagement with these parties (separate to any choice you have made via our consent mechanism).



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 to 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.

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 info@dataprotection.ie</p>	<p>Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois</p>
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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 or you can ask us for a copy.