



'Account Opening' 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.

This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes. If you apply for a loan with us, you will be provided with our Lending Privacy Notice to take account of further processing that may be necessary.

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, 7 Sexton Street, Limerick

Tel: 01 6778648 / 0818 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 / 0818 677864

Email: dpo@hsscu.ie

Health Services Staffs Credit Union is committed to protecting the privacy and security of your personal information. 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, county of residence, proof of identification and address documents, staff number, email, telephone, signature, source of wealth, source of funds, Politically Exposed Status, salary/income, occupation, employer, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, photograph, tax residency, relationship to existing HSSCU member (when joining as a family member of) details of membership of other credit unions, financial data, status and credit history, transaction data; contract data, details of the credit union products you hold with us, 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..

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 that we perform our contract with you.

Purpose for which we process your personal data;

- To open and maintain an account for you;
- To meet our obligations to you under the Credit Union's Standard Rules



- To contact you in respect of your account and any product or service you avail of; and
- To comply with our legal obligations, for example anti-money laundering, to identify connected borrowers

We may also collect, store and use “*special categories*” of more sensitive personal information including information about your health, any medical condition and sickness. This applies in certain circumstances such as with lending. (See *Insurance* for further details). We may process such 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. We do not collect such information generally.

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.

You agree to notify your credit union without delay in the event of any change in your personal circumstances, to enable your credit union to comply with its obligations to keep information up to date.

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 loan assessment, provisioning and financial crime prevention purposes and compliance with our legal duties in those regards. Where high risk threats are identified, these are investigated, and we may need to suspend account services for the safety and security of the account or debit card.

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.



- **Accounting** records required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than six years from the date to which it relates.
- The **money laundering** provisions of Anti-Money Laundering legislation require that certain documents must be retained for a period of five years after the relationship with the member has ended.
- We keep **income tax** record for a period of six years after completion of the transactions to which they relate.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes, public safety and the prevention and detection of fraud) for one month. We may retain CCTV footage for longer than one month where there is an unresolved dispute, or the footage has been required by An Garda Síochána.
- **Telephone recordings**, which are used in the normal course of business (i.e. for training and confirmation of instructions) and such recordings are held for seven years.

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.

International transfers of Data outside the EEA

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.

Other 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.

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 data. Please contact us using the details provided at the start of this document, so that we can make the necessary changes/updates.



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

Third parties: We may appoint external third parties to undertake operational functions on our behalf e.g. service providers of fraud detection software and support services who may use that information to monitor and help identify potential fraud. We will ensure that any information passed to third parties conducting operational functions on our behalf will do so with respect for the security of your data and will be protected in line with data protection law.

Irish League of Credit Unions (ILCU) Affiliation: The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as marketing and public affairs representation, monitoring, financial, 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 Privacy Notice of ILCU can be found at www.creditunion.ie

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.

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. To administer these insurances, we may pass your information to ECCU and it may be necessary to process 'special category' personal data about you. This includes information about your health which will be shared with ECCU for the purposes of our life assurance policy to allow ECCU to deal with insurance underwriting, administration and claims on our behalf. Further information can be found in our lending privacy notice.

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.

Payac: For the purposes of processing electronic payments services on your account (such as credit transfers, standing orders and direct debits), providing current account, debit card and related services to our members, the Credit Union is a participant of Payac Services Company Limited by Guarantee ("Payac"). Payac is credit union owned and operated company that assists participating credit unions in obtaining regulatory approval, developing, implementing and providing ongoing support for payment account services. This includes among other activities assisting in the establishment of operating standards, negotiating third party services and outsourcing arrangements in behalf of participating credit unions.

FIS: Fidelity National Information Services ("FIS") is a data processor acting on our behalf through Payac for the administration of our card services associated with your current account. This service includes monitoring for and prevention of financial crime, reporting of fraud and other related activities to protect our members from financial loss.



Debit Card: If we issue you a debit card, we will share transactions details with companies which help use to provide this service. Transact Payments Malta Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their Privacy Policy which is available here <http://currentaccount.ie/files/tpl-privacy-policy.pdf>



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 includes PPSN where held.

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. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013. For the same reason, we will also hold the information about you when you are no longer a member. We will process your data to investigate and resolve complaints and errors on your account or service provided to you. 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 and the appropriate Statutory Authority if required by law. We may also be required to disclose information by or to a court or in the course of an insolvency process, where a borrower has availed of a debt resolution mechanism.

Compliance with our anti-money laundering (AML) and combating terrorist financing obligations(CTF): 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. We perform checks on members and authorised parties which includes adverse media checks, screening against external databases and sanctions lists and establishing status as politically exposed persons or relatives or associates of. We monitor and screen transactions for the purpose of preventing and detecting crime. This may require us to investigate and gather intelligence on suspected financial crimes, fraud and threats and share this data with law enforcement and authorities designated in law. We may share data with other banks and third parties to help recover funds lodged to your account in error or by misdirection by a third party. We must file reports on the Beneficial Ownership Register, the Beneficial Ownership Register for Certain Financial Vehicles (“CFV”), on the Bank Account Register, the European Union Cross-Border Payments Reporting (“CESOP”), the Central Register of Beneficial Ownership of Trusts (“CRBOT”) and the Ireland Safe Deposit Box and Bank Account Register (ISBAR). This reporting obligations requires the credit union to submit certain member data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. For further information, please contact the credit union directly.

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

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.



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.

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, quality of service and training purposes.

Our Legitimate interest: To ensure a good quality of service, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes.

Member Satisfaction Surveys: To help us improve and measure the quality of our products and services, we undertake member satisfaction surveys from time to time. This may include using specialist market research companies to aid us in the process. Co-operation in these surveys is voluntary. We do not ask members to share financial or sensitive information as part of the survey.

Our Legitimate interest: To help us improve and measure the quality of our products and services. To ensure a good quality of service, to assist in training, to use the feedback in the design and delivery of improvements to our products and services. To grow our business and develop new products and services

Strategy, Statistical Analysis and Credit Union Financial Performance: As part of our commitment to making informed decisions about products and services we provide to our members, we may utilise data analytics to analyse our common bond performance. This is done via a third party (currently RW Pierce). We do not use data in its original state where individuals can be identified, and no analytics are carried out prior to anonymisation of the data. The only processing exception is our geo-location application, which transforms addresses into small area codes to prevent individual households from being identifiable.

Our Legitimate interest: This analysis, conducted by a trusted third-party provider under contract, ensures that we act in the legitimate interests of our members, who are the ultimate owners of the credit union, and safeguard the financial stability of the credit union into the future.

Risk Management: As part of internal administration, we undertake statistical analysis of engagement through the various channels and departments, research and planning. We do this for management, financial and regulatory reporting. We also seek to improve internal business processes, with focus to member experience, compliance requirements, fraud prevention protection and cost effectiveness in delivery. This can include quality assurance testing and analysis of complaints, errors and feedback.

Our Legitimate interest: This analysis is done to ensure that the credit union is operated in a responsible and prudent manner. It helps us target areas of risk so that we can manage them better.



Your consent

We will only carry out processing which is based on your consent and will cease processing once you withdraw such consent

Marketing

You may receive marketing communications from us if you have actively expressed your interest in receiving such material and, in each case, you have not opted out of receiving that marketing. 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).

Authentication Services

When you use our Authentication Services, whether via the app or through our website, we process personal data which includes but is not limited to your mobile number, email, username, details of your activity and security credentials which you created when you registered. You can access your account online via the app by activating the biometric and facial recognition features on your phone. This will also allow you to complete transactions online using the biometric features you have authorised through your phone. When applicants for membership seek to join the credit union online or members submit their identification documents online to us, we use biometric facial recognition technology to capture and verify the individual against the identification documents the applicant/member has provided during the process. The process may also include using that technology to copy information from your documents to information on your application.

Where biometric features are applied, we employ these steps with your permission because we have a legal obligation to ensure secure customer authentication when a member is transacting online and for the purposes of identifying suspicious behaviour (e.g. identity theft) and fraud prevention.



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.

You can also exercise your rights by calling into your local branch or telephoning us on 0818 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:

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| <p>Telephone +353 1 7650100 / 1800437737 Web form: : https://forms.dataprotection.ie/contact</p> | <p>Postal Address: Data Protection Commission 21 Fitzwilliam Square South, Dublin 2, D02 RD28 Ireland</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.