



'Guarantors (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.

Credit Union Contact Details

HSSCU, 5 High St., Christchurch, Dublin 8
HSSCU, Unit 1B, Dargan Building, Heuston South Quarter,
Dublin 8, D08 V5X2
HSSCU, 5-6 The Triangle, Ranelagh, Dublin 6, D06 TD59
HSSCU, St. Gabriel's Branch, 34 St. Patrick's Quay, Cork, T23
T624
HSSCU, Mayoralty House, Merchants Road, Galway,
H91DDT2
HSSCU, 7 Sexton Street, Limerick, V94 X2W9

Tel: 01 6778648 / 0818 677864

Website: www.hsscu.ie

Data Protection Officer Contact Details

Health Services Credit Union Limited
St Gabriel's Branch
34 St Patrick's Quay
Cork T23 T624

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 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, contact details, address, date of birth, proof of identification and address documents, signature, employment details, income, occupation, employer, Tax Identification/PPSN numbers, credit union transactional data, financial data, status and credit history, financial information such as outgoings, bank statements, 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, CCTV footage, telephone voice recordings.

The purposes for which we use your personal data:

The credit union will use your personal data to assist it in carrying out the following:

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union;
- Verifying the information provided by you in the application;
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/ member getting into arrears;
- Collection of the debt;



- Conduct due diligence and credit checking;
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union and Central Bank Regulations

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

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 us without delay in the event of any change in your personal circumstances, to enable us to comply with our obligations to keep information up to date.

Third Parties

To maintain and administer home loans, we may need to share your information with our solicitors, Pierse Fitzgibbon Solicitors, so that they may provide legal services to us

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 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.
- **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. **Loan assessment documentation** (e.g. bank statements, payslips etc) will be retained in conjunction with the loan 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.



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.

Our use and sharing of your information

Our legal basis for processing personal data supplied by you for the purpose of this guarantee is in furtherance of this contract and legitimate interest where a credit check is conducted.



Fulfilling contract

This basis is appropriate where the processing is necessary for us to manage the loan account, to which you have provided Guarantee

Administrative Purposes: We will use the information provided by you, either contained with the loan application or any other form or application, for the purpose of assessing this application of Guarantee. Should the account guaranteed by you subsequently go into arrears or the circumstances of the borrower change, we will consult with you in accordance with our legal obligations and may need to call upon you to repay the debt.

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 and/or subsequent contract as Guarantor 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

Credit Assessment: When assessing your application to act as Guarantor of a loan, the credit union will take several factors into account and will utilise personal data provided from:

- your application form or as part of the loan to the borrower, supporting documentation provided by you
- your existing credit union file (where applicable),
- credit referencing agencies such as the Irish Credit Bureau (ICB searches ceased on 1st October 2021)

The credit union then utilises this information to assess your suitability to act as Guarantor in line with the applicable legislation and the credit union's lending policy. We sometimes use partial 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.

As part of our loan assessment process, you will have the option to avail of Open Banking through an intermediary service provider called CRIF Realtime Ireland Ltd ('CRIF'). CRIF is an 'Account Information Service Provider' or AISP. An authorised AISP can ask for permission to access bank account data and use information to provide a service. CRIF is authorised by the Central Bank of Ireland. You will be given the option to share your account data (e.g. bank statements) with HSSCU using CRIF. None of your information will be shared without your consent. At no point do we ever see or have access to your banking passwords. HSSCU cannot in any way affect your bank account. Further information on this service can be found on our website.



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. 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 following date of final payment of the loan. We will process your data to investigate and resolve complaints and errors on the service provided to you. 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. Where it relates to a Transfer of Engagements or Business Re-organisation, we may be required to share data/make certain disclosures required under legislation, statutory framework or directions from CBI.

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: The Credit Reporting Act 2013 and the Regulations provide the legal basis for the collection and processing of credit and personal information. From 1 February 2025, lenders must submit personal and credit information for guarantees for loans entered into or after 1 February 2025. As guarantor, we have a right to request a copy of your credit report. Your credit report will contain full information on those loans in your own name, and limited information for any loans you have guaranteed. Your role in a loan, whether you are a borrower, co-borrower, or guarantor will be shown on the credit report.

* Central Credit Register (CCR)

The Central Credit Register (CCR) is a national mandatory database of personal and credit information. Personal data held includes name, address, date of birth, gender, telephone number and personal public service number (PPSN). Credit data held on the CCR includes the loan type, such as mortgage, credit card, overdraft, personal loan, business loan, HP, PCP etc; the amount borrowed and the amount outstanding. Information submitted by Financial Institutions each month is used to create a credit report which is stored on the CCR. This information will be released only when a lender or the borrower to whom the information relates requests access; if the borrower to whom the information relates, consents to the release of this information to another person; as provided by the Credit Reporting Act 2013, the Data Protection Act 2018 or as required or permitted by law or any other applicable legislation. For more information, including on how your data is processed, see www.centralcreditregister.ie.



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).

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 as Guarantor for the loan applied for. When using the service of a credit referencing agency we will pass them your personal details and details of the loan under guarantee.

ICB used **Legitimate Interests** (GDPR Article 6 (f)) as the legal basis for processing of your personal and credit information. These



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

Debt Collection: Where the loan agreement has been breached and we have called upon the guarantee provided by you, 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 guarantee provided in order that they contact you and details of the indebtedness in order that they recover the outstanding sums

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.

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

Use of an AI tool in call monitoring: We use an AI supported tool to help us review some recorded calls. As part of this, it creates short summaries of calls and highlight key topics. We use it to help us with quality checks, staff training and coaching. A member of staff always reviews the information. Only authorised staff can access call recordings, AI summaries and insights. We limit access and keep it secure.

The AI does not make decisions about you, your account or services offered. It is not used for marketing or profiling.

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 and cost effectiveness in delivery. This will include quality assurance testing and analysis of complaints, errors and feedback.

Business Re-Organisation and Transfer of Engagements: We may share or transfer your personal data where necessary in connection with a proposed or completed transfer of engagements, merger, restructuring

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.

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

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.

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. to ensure a consistent and fair quality assurance process and to quickly and accurately resolves any disputes.

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

Our Legitimate interest: We do so where it is necessary for our legitimate interests in managing, developing and re-organising our organisation and, where applicable, to comply with legal and regulatory obligations.



or other corporate transaction affecting the credit union. We may share your data with another credit union (and any advisors and service providers involved), where a transfer of engagements or merger to or from that credit union is being considered or carried out. We may share your data, or receive data about you, so that the proposed transfer can be assessed, planned and tested, and, if it proceeds, so that your accounts and records transfer accurately. Any party handling your data for this purpose is bound by confidentiality and may use it only for the transfer. Data security is maintained at all times throughout the process.

Processing is necessary for establishment, exercise or defence of Legal Claims

We sometimes process your personal information, including sensitive personal information, such as information concerning health for the establishment, exercise or defence of legal claims. We will only use special categories of data to the extent this is necessary.

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.

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.

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.



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:

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