



'Mortgage 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 mortgage loans or mortgage lending related purposes.

Credit Union Contact Details

HSSCU, 5 High St., Christchurch, Dublin 8, D08 X7T1
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.

Who do we collect data about?

We collect and process your personal data only when such data is necessary in the course of providing our mortgage application assessment services to you in order to take steps at your request prior to entering into a mortgage agreement. This personal data includes any offline physical data or online data that makes a person identifiable.

For the purpose of the mortgage application process, we process data for the following groups of individuals where it is necessary:

- A. Member (joint)
- B. Relevant third parties
 - Spouse/Legal partner
 - Joint Account Holders



- Outstanding Creditors
- Recipient of maintenance
- Dependent Individuals
- Builder/Developer/Engineer
- Third Party Contributions
- Solicitor
- Insurance Advisor
- Property Valuer
- Connected/Related Party Borrowers
- Current mortgage Lender
- Current and past Employers
- Member's Bank accounts to include current, deposit and savings accounts held with relevant financial institutions
- Accountant

If you apply for or hold an account in joint names or name a dependant, you should only give personal information about someone else with their permission.

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this Privacy Notice before their personal information is shared with us (e.g., Spouse/Legal partner, Joint Account Holders etc.) You do not need to provide this Privacy Notice in the following situations

- the individual already has the information
- obtaining or disclosure such information is expressly laid down in the law to which the credit union must comply and which provides appropriate measures to protect the individual's legitimate interests
- where the personal data must remain confidential subject to an obligation of professional secrecy regulated by law

We are the controller for the personal information we process, unless otherwise stated.

How do we collect the data?

You directly provide us with most of the data we collect. We collect data and process data when you:

- Submit an online mortgage application
- Provide supplementary information necessary for your individual application which is required to assessment your suitability to repay the mortgage loan
- Request support which may require additional information
- Voluntarily complete a member survey or provide feedback
- Use or view our website via your browser's cookies

What personal data do we use?

As part of our mortgage application services to you as a member, we **may** need to obtain and process personal data as required **where necessary** to assess your application to determine if you have the means to replay the mortgage applied for. We may collect, store, and use the following categories of personal data about you:

- Your name, address, date of birth, nationality, country of residence, 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, transaction data; contract data, details of the credit union products you hold with us, previous addresses, spouse /partner,



nominations, Tax Identification/PPSN numbers, financial data, status and credit history, life assurance details, financial information such as outgoings, savings & commitments including maintenance and childcare where recipients of maintenance names provided (proof of payment may be requested), bankruptcy, details from credit reference agencies on other loans/debts held by you, financial statements, dependents, relationship with joint borrowers, retirement age, 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. Part of the mortgage application process may involve online collection of data through an administration system we use. When using this, we collect additional personal data such as username or log data such as time and date of access.

- **Additional Information required for home loans as follows:** Mortgage Loan Details to include details of the property to be mortgaged and any other relevant information provided by you to assist your mortgage application, Declarations, Authorisations and Consents, CCR Information, Letter of Offer Special Conditions, ESIS, Terms and Conditions of the Mortgage Loan, Valuer details, Valuation reports, Land Registry folio, Certificate of Title, Deed of Assignment/ 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, Power of Attorney and medical data. Home Insurance Policy. 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.

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 do not collect such information generally

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.
- Verifying the information provided by you in the application.
- We are obliged to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering the loan, including where necessary, steps to recover the loan or enforce any security taken as part of the loan.
- 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. The final decision rests with our credit assessors. We **do not** conduct automated decisions which produces legal effects concerning any of our members mortgage loan application.
- 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 collect the following special categories of data where necessary:

- In rare situation, life assurance policies may be arranged via ECCU and involved the collection of health 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.

When do we receive your data from a third party?

Where it is necessary for the mortgage application service provided, we may receive your data indirectly from the following sources:

- Related party information where a member is also an employee, volunteer or board of director
- Where member is self-employed to confirm tax clearance e.g your accountant
- When you are named in an insurance policy application
- Credit reference agencies- Central Credit Register and Irish Company Search Sites
- Public agencies such as property registration authorities, the Companies Registration Office or judgement registries, Insolvency Services Ireland Registries
- Published Revenue commissioner default payers list
- Published media reporting relating to your financial position
- Judgement searches available
- Information provided from
 - Spouse/Legal partner
 - Joint Account Holders
 - Outstanding Creditors
 - Recipient of maintenance
 - Dependent Individuals
 - Builder/Developer / Engineer
 - Third Party Contributions
 - Solicitor
 - Insurance Advisor
 - Property Valuer
 - Connected/Related Party Borrowers
 - Current mortgage Lender
 - Current and past Employers



- Member's Bank accounts to include current, deposit and savings accounts held with relevant financial institutions
- Accountant

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.

Third Parties

The credit union provides your information to insurance companies for the purpose of insuring the loan (limited circumstances of occurrence).

We are members of Credit Union Mortgage Services DAC (MSDAC) which provides mortgage origination support services to the Credit Union.

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.

We may act on the authority of one joint Account Holder to share or allow a third-party access to your member account information. This means, unless we have agreed that we need the consent of each joint Account Holder, or have a legal obligation to get this consent, we will treat the authority of one Account Holder as authorisation on behalf of any other Account Holder(s) for a joint Account. If you instruct us to share or allow a third-party access to any Account information for a joint account, you are responsible for ensuring the other Account Holder(s) are aware and permit such access.

Any joint account holder is entitled to access the details and transaction information of the joint account as a whole.



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. 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.

- **Mortgage Loan Offer Letters with the Mortgage Deeds** are contracts and where the document is under seal, the credit union retains them for thirteen years from date of discharge, final repayment or transfer of the loan.
- **Loan applications** form part of the credit agreement, for which you have provided a guarantee and as such, in respect of a home loan, we retain them for thirteen years from date of discharge, final repayment, transfer of the 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.

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. 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.

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. This includes circumstances where a borrower either defaults or indicates risk of default on their loans. If this should occur with you, we and/or agents will engage to assist you in re-establishing adherence to an agreed arrangement. Changes to the contract may have a bearing to the overall cost of credit and credit reporting and this will be discussed with you as part of the process.

Security: In order to secure repayment of the loan, it will 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 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 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

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.

MSDAC: For the purposes of supporting us in the processing, fulfilment and servicing of mortgages based on a standardised, consistent and reliable methodology.

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). For mortgages, we require borrower to source their own life assurance cover. In rare situations, we may source cover with ECCU. 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.

Credit Assessment: When assessing your application for 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 your loan supporting documentation
- your existing credit union file,
- credit referencing agencies such as the Central Credit Register and international Credit Bureaus, where a borrower has lived outside Ireland for a defined period of time pre application.

This includes gathering financial and personal data, conducting affordability checks, verifying income, employment and liabilities and performing credit checks (per Credit Reporting Act 2013). 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 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. The final decision rests with our credit assessors.

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.



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 may need to share your information with our 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. 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 conduct loan book reviews for the purposes of provisioning calculations – this involves analysing loan performance data to accurately predict the rate of default and set aside appropriate reserves within the credit union to meet this. We will process your data to investigate and resolve complaints and errors on your account or 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. 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. 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.

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. 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 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 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 is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted in the sum of €500



or more, the credit union is obliged to report both personal details and credit details of the borrower to the CCR. A credit search is made on the Central Credit Register at initial mortgage application and again as part of our pre drawdown of funds checks to ensure no material changes in circumstances such as new, undisclosed debt has occurred since Approval in Principle.

* Central Credit Register (CCR)

The Central Credit Register (CCR) is a national mandatory database of personal and credit information. The Credit Reporting Act 2013 and the Regulations provide the legal basis for the collection and processing of personal information. Personal data held includes a borrower's 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.

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). A credit search is made on the Central Credit Register at initial mortgage application and again as part of our pre drawdown of funds checks to ensure no material changes in circumstances such as new, undisclosed debt has occurred since Approval in Principle.

Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance.

ICB 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



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

requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention.

Mortgage Lending and Transfer/Assignment of Mortgage

When assessing your application for a mortgage loan the credit union may use the information which it obtains about you and the secured property, for the purposes of servicing the mortgage and the secured property, credit checks which may involve group reporting and management purposes, any transfers or other dealings with the secured property, the mortgage and the mortgage conditions.

The credit union may share the information it obtains when assessing your application for a mortgage loan for the said purposes and for the following:

- any (or any proposed) assignee, transferee, mortgagee, chargee, sub-mortgagee, sub-chargee, trustee or other grantee or dispose or successor and their respective officers employees agents and advisers;
- any other person directly or indirectly participating in or promoting or underwriting or managing or auditing (or proposing to do so) any transfer, assignment disposal, mortgage, charge, sub-mortgage, sub-charge, trust securitization scheme, mortgage backed promissory note facility or other transaction or arrangement relating to or involving the mortgage and the conditions attached to the mortgage;
- agents and advisers of your credit union and
- Any other party to whom you have agreed the credit union may disclose your information, each of whom in turn may use that information for the above and other purposes which have been disclosed to you.

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.

Personal Data from Others

Where you provide to your credit union personal data relating to individuals (which for these purposes shall include, without limitation, any employees, agents, spouses, partners and personal representatives of the persons included in the expression Mortgagor) you warrant that you are acting in accordance with the requirements of the Data Protection legislation in providing that information to your credit union for the purposes set out in your mortgage for the purposes set out in this clause and for such other purposes as have been disclosed to you by your credit union prior to you providing such personal data to your credit union.

Debt Collection: Where you breach the loan agreement, we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they contact with you and details of the indebtedness in order that they recover the outstanding sums.

Our legitimate interest: The credit union, where appropriate will 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.

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.

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.

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 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: 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: 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

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 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 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.

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.



Your consent

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

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

Right to withdraw consent at any time

Where consent is relied upon as a basis for processing of any personal data, you will be presented with an option to agree or disagree with the collection, use or disclosure of personal data. Once consent is obtained, it can be withdrawn at any stage except in cases where the information may be required for contractual or legal basis such as health data for a life policy required as part of the conditions of approval.

Impact of Withdrawing Consent

- If health data is required for mortgage protection insurance, withdrawing consent may affect the mortgage approval since most lenders require proof of mortgage protection before finalizing the loan.
- The Credit Union will inform the applicant of any consequences of withdrawing consent, such as the impact on insurance eligibility or loan approval.

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.



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.*

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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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.