



'Third Parties Authorised on a Member's Account' – Privacy Notice

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted solely for the purpose of carrying out the abovementioned objectives.

Credit Union Contact Details

HSSCU, 5 High St., Christchurch, Dublin 8, 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, 5 Sexton Street, Limerick, V94 X2W9

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 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, address, date of birth, relationship to the member, proof of identification and address documentation, signature, interactions with credit union staff and officers on the premises, by phone, or email, CCTV footage and 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:

- Verifying information provided by you in relation to your authorisation to transact on a member's account;
- Ensuring that the authorisation is legitimately in place and that all transactions are in accordance with the authorisation;
- Meeting legal and compliance obligations and requirements under the rules of the credit union and regulators.

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 services requested 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.

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. Once the retention period has expired, the respective data will be permanently deleted.

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. If you require further information, please contact us.

Planned data transmission to third countries

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

Cookies

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

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

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

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 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 credit union services

Administrative Purposes: We will use the information provided by you, as part of the authorisation process to transact, for the purpose of maintain and administer any account you have been authorised to transact on.

Third parties: We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will 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, 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 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



Our legal duty

This basis is appropriate when we are processing personal data to comply with Republic of Ireland Law

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance, and auditing purposes. For the same reason, we will also hold the information about you when the authority to transact on the specified account has expired. 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, the appropriate Supervisory Authority if required under law. This includes obligation to file reports such as the European Union Cross-Border Payments Reporting ("CESOP"), the Central Register of Beneficial Ownership of Trusts ("CRBOT") and Ireland's Safe Deposit, Bank and Payment Account ("ISBAR"). This reporting obligations requires the credit union to submit certain data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. 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. For further information, please contact the credit union directly

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 are obliged to report accounts which have an IBAN associated to Ireland's Safe Deposit, Bank and Payment Account Register (ISBAR). ISBAR is managed by the Central Bank of Ireland. Along with information related to the Account Holder, it also includes information on those acting on behalf of a member through a formal authorisation e.g. Power of Attorney. Personal details such



as name, address and date of birth related to the third party individual are provided to ISBAR. Further information on ISBAR can be found at [ISBAR FAQ](#) | [Central Bank of Ireland](#)

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.

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, consents and training purposes.

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.

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, the account you are authorised to 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, 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.

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. This may occur with another credit union, professional advisors, auditors, regulators and other parties involved in the transaction. This may include your contact details, identification, information, records relating to your authority to act on behalf of a member and correspondence with us. Appropriate confidentiality and security measures will apply to any such sharing.

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 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 01 7650100 Lo Call Number-1800 437 737 Website: www.dataprotection.ie	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.