Data Protection Privacy Notice

As a member of Capital Credit Union, you share your information with us. This allows us to provide our products and services to you and in doing so we commit to protect your information. This Data Protection Notice provides you with information about Data Protection at Capital Credit Union.

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1. Data Protection at Capital Credit Union

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.

Capital Credit Union is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal data about you during and after your relationship with us.

Capital Credit Union provides financial related services to our members. Our head office is in Dundrum, Dublin 14 and we have other offices in the South Dublin City area.

References in this notice to Capital Credit Union Limited (CCU) will also include “CCU” or “We” or “Us” or “Our”.

We always understand and appreciate the trust you place in us to collect, process and protect your personal information.

As the Data Controller and processor of your personal information, we have and will continue to:

- act responsibility and give priority to the security of your information through a strong culture of compliance.
- provide you with the assurance that your information is safe and secure through how we manage our controls, processes and systems to improve our level of customer service; and
- conduct our business in a fair and transparent way and ensure we minimise the risk or impact on your data rights and freedoms.

To ensure that your rights are protected our Data Protection Officer oversees the collection, use, sharing and protection of your information. Our contact details are:

1. Email: DPO@capitalcu.ie
2. Telephone: 01-299 0400
3. by writing to the Data Protection Officer, Capital Credit Union, Main Street, Dundrum, Dublin, D14 PD79.

2. What personal data do we process?

We may collect, store and use the following categories of personal data about you. We collect personal data from you at different stages of your engagement with us, for example, when you open an account, apply for a loan, complete a Nomination Form. We also collect information through other means such as our website, apps, telephone and CCTV recordings.

This includes:

- Personal Information
- Personal Financial Information, and
- Special Categories of Personal Data (in limited circumstances).

Personal Information	Personal Financial Information	Special Categories of Personal Data
Full Name (title, forename, middle name (if any), surname)	Personal bank and credit card account details	Health data: Declaration of your health, which may include information on current illnesses / treatments and/or previous illnesses / treatments over the last 5 years. This may be required for loan protection insurance.
Signature (including e-signatures)	Income and expenditure	Your financial transactions may reveal "Special Categories of Personal Data", such as political opinions or religious beliefs. This can occur if your bank statements show transactions, for example, donating to political parties, organisations, churches or parishes
Date of Birth	Statement of net worth	
Gender	Transaction data & history, purchasing and spending activity	
Nationality, Birth Country & residency status	Revenue documents e.g. p21 Balancing Statement and Form 11	
Home/Business address & accommodation status (current & previous)	Payment instructions	
Proof of identity documentation, e.g. details of driving license, passport and birth certificate, visa details (if applicable)	Account positions and history & credit status, including arrears and insolvency status	
Proof of address(es)	Credit records, worthiness, standing or capacity	
Tax Identification Number (including PPSN) & Tax residency status & country	Business accounts and expected turnover	
Email address	Origin/source of funds/wealth	
Telephone and Mobile numbers	Purpose of your account including details of products you hold with us	
Marital status	Salary information	
Partner and dependents	Payslips	
Educational details		
Telephone call recordings		
Mother's maiden name		
IP address		
Employment details & occupation		
CCTV images/footage		
Politically exposed status		
Beneficial ownership status		
Nomination details		
Interactions with credit union staff on premise, by phone, or email, including current & past complaints		

When you apply for a loan online, we may collect additional personal data such as username or log data such as time and date of loan applications.

Additional Information required for home loans may include:
Valuation reports, Land Registry folio, Certificate of Title, Life Assurance cover documents – these documents contain the following information – Name, Address, date of birth, property value, member's solicitor's name, address and contact details and medical data. Source of Funds. Personal legal documents such as Separation/Divorce Agreements (if applicable), Confirmation of Gift letter (if applicable). Salary certificate completed by Employer. If self-employed, a tax clearance certification, audited accounts, Revenue Notice of Assessments, Business bank account statements may be requested.

3. Sensitive personal data

Special categories of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest.

As part of our service to members, we provide insurance which we purchase from ECCU Assurance DAC, ("ECCU"). This is a life insurance company, wholly owned by ILCU. This includes Life Savings (LS), Loan Protection (LP). If you chose to take a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes **information about your health**. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

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.

4. Purpose for which we process your personal data

The Credit Union will use your personal data to assist in carrying out the following:

- To open and maintain an account for you.
- To provide and maintain our products and services to you.
- Enter you in any promotional events.
- To contact you in respect of your account and any product or service you avail of or when you contact us.
- Find out how we can improve our products and services.
- Assess loan applications and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- To purchase loan protection and life savings protection from ECCU.
- Conduct credit searches and making submissions to the Central Credit Register.
- Administer any loans you may have, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan (Credit control).

- We may use credit scoring techniques and other automated decision-making systems to either partially or fully assess your application.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Provide updates on our loan products and services by way of directly marketing to you.
- Inform you how our other products and services might help you and how you can avail of them.
- Protect our interests.
- To meet our obligations under the Credit Union's Standard Rules and to meet our legal and regulatory obligations.
- To comply with our legal obligations for example anti-money laundering and beneficial ownership reporting obligations.
- For security reasons and to help prevent fraud or crime.

We need your personal identification data to enable us to comply with legal obligations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

Information that we collect on how you use our products and services and from our website, online banking and social media is analysed by us. This helps us to know how we engage with you, how you use our products and services, for marketing information and the protection from financial crime and fraud.

We may use technology to help automate our decision making, for example for loan applications. All decisions are assessed by us using a combination of the technology, the personal information you provide to us, your information that we already hold and information from third parties.

5. How secure is my information with third-party service providers?

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. We only permit them to process your personal data for specified purposes and in accordance with our instructions. The recipient of the information will also be bound by confidentiality obligations.

6. If you fail to provide personal data to us

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations. One of the principles of the GDPR is *Data Minimisation*, whereby we only ask for personal data that we need to carry out a service or provide a product for you, so when we do ask for personal data, it is in order to provide you with a product or service. We are required to share personal data with certain third parties such as the Central Credit Register, Revenue, etc.

7. 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.

8. 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 may be used for loan assessment, provisioning and anti-money laundering / fraud detection purposes and compliance with our legal duties in those regards. We may also carry out profiling in order to tailor our marketing to you.

9. Partial Automated Decision Making

We may use technology to help us make decisions automatically. To help us make decisions that are efficient, quick, and fair based on the information provided, 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.

We use the information that is provided by you and information from third parties such as credit reference agencies.

For example, when you apply for credit with us, we use different data sources to understand and assess your ability to repay the loan. This ensures responsible lending.

The information we may process for automated decisions include:

- Income
- Financial position
- Transaction history
- Employment details
- Discretionary spending
- Credit rating
- Your other loans, mortgages and products
- Bill repayments

Analysing this information helps us assess your ability to repay and meet the periodic loan payments. The automated decision is just one component of our overall decision-making process with regard to credit decisions.

10. 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.

For more information on Cookies and how you can manage them, please see our Cookies Policy, which is available on our website (see our Cookie Policy at the end of the home page).

11. Keeping your information safe and secure

We protect your information with security measures under the laws that apply. We keep our computers, files and buildings secure.

The collection, use, sharing, protection and deletion of your information is overseen by our Data Protection Officer. Our Data Protection Officer advises on how we can best understand risks to your data rights and freedoms, processes implemented to protect these and has responsibility to report to the Office of the Data Protection Commissioner if there is any breach of your data or our obligations, as well as communicating directly with you in cases of high risks to your data protection rights.

When you contact us to ask about your data, we may ask you to identify yourself. This is to help us protect your information.

12. Transfers of personal information outside of the European Economic Area (EEA)

We do not transfer your personal information outside of the European Economic Area (EEA). If at any time in the future, we transfer your personal information outside of the European Economic Area (EEA) will notify you and obtain your consent in advance.

We may transfer your personal information to the UK, under the Adequacy Decision between the EU and the UK agreed under Article 45 of GDPR.

13. What is the lawful basis to process & share your data?

To meet our legal and regulatory obligations we collect and retain your information by relying on one or more of the following lawful bases:

- Your agreement and consent
- To create and maintain a contract
- A legal obligation
- Protect your vital interests and those of others
- In the public interest and
- Our legitimate interests.

Your Agreement / Consent
We will only carry out the below processing when we have obtained your consent and will cease processing once you withdraw such consent.

We require your consent to process certain information such as Special Categories of Personal Data.

We ensure your consent is obtained under the following principles:

- Positive Action - Clear affirmative action by you is required. We do not use pre-ticked boxes, imply or assume consent if there is no positive action from you
- Free will – Your consent must be freely given and not influenced by external factors
- Specific – We will be clear on what exactly we are asking your consent for
- Recorded – We will keep a record of your consent and how we got it
- Can be withdrawn at any time – We will stop data processing that requires your consent at any time you make a valid request. You can withdraw your consent at any time

Special Categories of Personal Data is information relating to:

- Racial or ethical origin, political opinions or religious or philosophical beliefs
- Trade union membership
- Biometric data
- Genetic data
- Physical or mental health
- Sexual life/orientation
- Commission or alleged commission of any offence by the data subject or
- Any proceedings for any offence committed or alleged

Information on online activity: If you use our website, we may collect information about your online activity using technology known as 'cookies'. They can be controlled through our cookie consent banner. (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, so you may distinguish them from other categories). More information on Cookies can be found in our Cookie Policy available on our website.
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.

Marketing & Market Research - To directly contact you about our products and services: With your consent, we will let you know what products or services you might like, for example via direct marketing. You can select how you prefer to be contacted on our application forms or by contacting us, i.e. by phone, post, email, text or through other digital media. To help us improve and measure the quality of our products and services we undertake market research from time to time.

Schools Quiz: This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools' Quiz is open to entrants aged 4 to 13. Upon entry parent/legal guardians will be given further information and asked for their consent to the processing of their child's personal data. Where the person is below 16 then we ask that the parent/legal guardian provide the appropriate consent.

Website: If you use our website, we may collect information about your online activity using technology known as cookies. They can be controlled through our cookie consent banner. (Please note some cookies are essential for the website to operate and so your consent is not required for these).

To create and fulfil a Contract
This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you.

Administrative Purposes - Providing products and services: 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 may be necessary to obtain security such as a charge on your property or other personal assets. If applying for a Home Loan / Mortgage, we will engage the services of, and share your personal data with, a Solicitor.

Third parties: We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with data protection law.

Repayment of loans and collect outstanding debts: We monitor all loans and their repayments. When repayments are overdue, we may share your personal data with third parties to help us to recover these overdue repayments.

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, compliance, risk, learning and development, and insurance services to affiliated credit unions. As HSSCU Ltd. 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.

Processing of electronic payments services: For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), the Credit Union is a participant of PAYAC SERVICES CLG ("PAYAC"). PAYAC is a credit union owned, shared services company that provides electronic payment services for the credit union movement in Ireland. PAYAC is an outsourced model engaging third party companies to assist with the processing of payment data. For more information on PAYAC's privacy policy see the following link: https://payac.ie/privacy-policy/.

Debit Cards: If you have a debit card with us, we will share transaction details with companies which help us to provide this service.

Insurance: As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable). If you choose to take out a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

Credit Assessment: When assessing your application for a loan, the credit union will take a number of 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 Registrar

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.

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 the credit union 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. The credit union cannot in any way affect your bank account.

Member Service: We may use information about your account to help us improve our services to you.

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

Tax liability: We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction. Where a member is tax resident in another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions. Under the "Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008" credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013.
For the same reason, we will also hold the information about you when you are no longer a member.
We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection, Register of Beneficial Ownership, the Financial Services and Pensions Ombudsman Bureau of Ireland, and the appropriate Supervisory Authority if required under law.

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

Compliance with our anti-money laundering and combating terrorist financing 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 by Part 2 of the Criminal Justice Act 2013, the Criminal Justice (Money Laundering and Terrorist Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives). This will include filing 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.

Authorised third parties: As flagged, 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 or internal third party authority form. 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 on the Central Bank of Ireland's website.

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.

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. However, the Credit Union does so for loan applications of €500 or more. 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 and guarantor to the CCR.

For Guarantors: 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 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.

House Loans: 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 teams' family or a business in which a member of the Board /Management Team has a significant shareholding.

Protect your vital interests and those of others

We share information to protect you.
Sometimes we suspect that you and other members of the Credit Union may become victims of financial fraud. If this arises, we will share information with third parties to help prevent fraud and keep you protected.

In the public interest

Prevention of fraud and financial crime.
We may suspect that you or other Credit Union members may become victim of a financial fraud or identify activity that may lead to a financial crime. We will share information with third parties to help prevent fraud and financial crime.

Our 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

Capital Credit Union exists to provide savings and loans to our members. Our legitimate interests are to ensure that we provide you with the products and services that you need, manage the business efficiently and comply with all laws and regulations.

Manage the Credit Union on behalf of members: We review how our products and services are used to keep them up to date. We ensure that all data is held safely and securely by us with appropriate computer safeguards in place. We review and mitigate all known risks to maintain the most secure systems and procedures.

Conduct research with our members: We continually review our products and services and the satisfaction of our membership. We do this by collecting and analysing data to better inform us and help us the efficiently run the business. We may also share this data with third parties who assist us with research.

Improve our products and services: By collecting and analysing data, we can identify groups of members and trends in the wider market. Using the analysis described we enhance our products and services to continuously meet your needs. This can also allow us to provide a more personalised member service.

To develop strategy, undertake statistical analysis, and assess current and future Credit Union financial performance: As part of our commitment to making informed decisions about products and services, we utilise data analytics to analyse our common bond performance. 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.

We engage third party providers (RW Pierce (Ireland) Limited) to assist with our common bond analysis. 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 geolocation application, which transforms addresses into small area codes to prevent individual households from being identifiable. No analytics are carried out on data where individuals are identifiable. All data is anonymised before it is analysed.

Our providers may in-turn share this anonymised data with the Irish League of Credit Unions (ILCU) to facilitate the compilation of accurate statistical information of the overall Credit Union sector. This data would be used by the ILCU for national and regional analysis as well as in providing valuable sectoral information which could be used for advocacy purposes, such as when engaging with government on behalf of Credit Unions.

Prevent financial crime and protect our computer network and data: We continually monitor and analyse activity on our computer network to identify any possible financial crime threats and protect the data. We share information with third parties to help manage these risks and protect both our interests.

Know Your Customer, Anti-Money Laundering and Credit Referencing checks: To allow you to become a member and to offer loan products we musty validate your identity and your ability to repay a loan. We may share information with third parties to conduct checks and validate our information.

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 make contact with you and details of the indebtedness in order that they recover the outstanding sums. 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 may carry out searches using Vision-Net in order to assess your credit worthiness to repay a loan. 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, health and safety and the prevention and detection of fraud. 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 and to prevent and detect fraud.

Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, quality of service and training purposes - To ensure a good quality of service, to assist in training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes.

14. Direct marketing

We need your consent to make you aware of products and services which may be of interest to you. We may do this by telephone, post, email, text or through other digital media.

We analyse information that we collect through your use of our products and services and on our social media, apps and websites, as part of our direct marketing. This helps us understand your financial behaviour, how we interact with you and our position in a marketplace. This helps us to provide you with the most suitable products and services.

You may opt out from direct marketing at any time.

15. 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.

While these retention periods are our policy, they are also subject to legal, regulatory and business requirements, which may require us to hold the information for a longer period. This includes meeting minimum retention standards for our Anti Money Laundering requirements. External authorities may also require us to retain data for longer than our policy. We must do this to protect both of our interests.

We continuously assess and delete data to ensure it not held for longer than necessary.

Service / Document Type	Document	Retention Period
Membership Application and Account Opening	– Account Opening documents – Legal / Regulation Identification Documents – Account Records – Member Information – Member Complaints – Member Instructions – Member Communications – Deceased Accounts – Loan Protection / Life Savings (LPLS) Insurance Claims – Security Information – DIRT Information – Nomination Forms – Other forms, e.g. MDBI / Prize draw applications – Other Correspondence	Six years after account is closed
Telephone call recordings	– Recordings	Seven years
CCTV recordings	– Recordings	28 days
Credit Applications, Credit Approvals and Credit Control	– Credit Applications & Assessments – Supporting documentation – Credit Approvals – Credit Agreements – Credit Agreement Variations (such as loan reschedules) – Credit Control documentation & records	Six years after loan repayments completed

Service / Document Type	Document	Retention Period
	– Guarantees	
Declaration of Health	– Declaration of Health forms	Once loan is repaid. Note: Fully completed DOH forms are not retained by CCU, they are held by ECCU (as the data controller and provider of the insurance cover)
Transactions / Accounting Records / Income Tax Records	– Lodgement and Withdrawal dockets – Saving documentation	Six years after the transaction
	– Standing Order, Direct Debit and EFT mandates	Six years after account is closed
Other	– Health & Safety Reports – Legal Reports	Ten years

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

16. Sharing your information with third parties

Sometimes we share your information with third parties, in order to:

- provide products, services and information
- analyse information
- research your experiences dealing with us
- collect debts owed to the credit union
- prevent financial crime
- To engage professional services of third parties, who provide specialised services to us under contract, any such parties are bound by confidentiality
- assist with our common bond analysis. No analytics are carried out on data where individuals are identifiable. Our providers may in-turn share this data with the Irish League of Credit Unions (ILCU) to facilitate the compilation of accurate statistical information of the overall Credit Union sector. This data would be used by the ILCU for national and regional analysis as well as in providing valuable sectoral information which could be used for advocacy purposes, such as when engaging with government on behalf of Credit Unions.
- protect both our interests.

The third parties we may share information with may include:

- Credit reference agencies including the CRIF (http://www.crif.ie)
- Central Credit Register (https://www.centralcreditregister.ie)
- Providers of loan decisioning systems
- Fraud prevention agencies
- Company search databases
- Regulatory bodies, including the Data Protection Commissioner and the Central Bank of Ireland
- Companies we have a joint venture or agreement to work with

- Insurance companies
- Government bodies and other agencies, including Revenue and An Garda Siochana
- Cards/transaction processing banks
- Market research / common bond analysis companies
- Debt collection companies and agencies or other individuals who supply similar services
- External consultancy firms including Legal, Accountancy, Compliance and other Professional Services
- Any entity you request your data to be shared with.

We have contracts with third parties who provide sufficient guarantees that the necessary safeguards and controls have been implemented to ensure protection of your personal information.

We also must share information with third parties to meet any applicable laws, regulations or to meet lawful requests. When we believe we have been given false or misleading information, or we suspect criminal activity we must record this and inform law enforcement agencies.

17. Your rights in connection to your personal data

If you wish to exercise your data protection rights, please contact the Data Protection Officer by e:mail at DPO@capitalcu.ie, by telephone on 01-2990400 or by writing to the Data Protection Officer, Capital Credit Union, Main Street, Dundrum, Dublin D14 PD79.

When you contact us to ask about your information, we may ask you to identify yourself. This is to help us protect your information.

You have the right to obtain information, however this right cannot affect the rights and freedoms of others. We cannot therefore provide information on or about other people without their consent.

We will provide your personal data without charge. As permitted under the regulations however, where information requests are manifestly unfounded or excessive, we may either charge a reasonable fee or refuse to act on the request.

Your rights are detailed more fully in the next section.

Your Rights in connection with your personal data are to:

To find out whether we hold any of your personal data and if we do, **to request access** to that data or to be furnished with 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.*

You have **a right to complain** to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone +353 57 8684800 +353 (0)761 104 800 **Lo Call Number 1890 252 231** **Web Form: https://forms.dataprotection.ie/contact**	**Postal Address: Data Protection Commissioner** **21 Fitzwilliam Square South, Dublin 2, D02 RD28** **Ireland**

Please note that the above rights are not always absolute and there may be some limitations.

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 the Credit Union's Data Protection Officer in writing, by post or by email at dpo@capitalcu.ie.

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. If you wish to avail of either of these rights, please contact us at us directly, in person or by email.

18. Deleting your personal data (your right to be forgotten)

You may ask us to delete your personal data or we may delete your personal data if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or processed
- you withdraw your consent where there is no other legal ground for the processing
- you withdraw your consent for direct marketing purposes
- you withdraw your consent for processing a child's data
- you object to automated decision making
- the personal data have been unlawfully processed
- the personal data have to be erased for compliance with a legal obligation.

19. Updates to this notice

From time to time, we will update this notice if we change how we use your information, change our technology or change our products. The most up to date notice will always be on our website https://capitalcu.ie/privacy-policy/ .

20. Glossary of terms used in this notice

This glossary will help you to understand the data protection terms in this notice.

Anonymisation: process of turning data into a form which does not identify individuals and where identification is not likely to take place. The data once anonymised will no longer be personal data. The intention of anonymisation is that the data is irreversibly changed.

Automated Data: Information on computer or information recorded with the intention of or the ability of putting it on a computer. It includes information in any electronic format.

Automated Decision-Making (ADM): when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an individual.

Automated Processing: any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's economic situation.

Biometric Data: means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopy (finger print) data.

Consent: of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Data: means individual facts, statistics, or items of information regarding an individual. Data can refer to automated data and manual data.

Data Controller: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by EU or Member State law, the controller or the specific criteria for its nomination may be provided for by EU or Member State law.

Data Subject: means an identified or identifiable natural person (see Personal Data).

Data Processor: A Data Processor is a person who processes personal data on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of his/her employment.

Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the regulations. The DPO oversees how we collect, use, share and protect information.

EEA: the countries in the EU, and Iceland, Liechtenstein and Norway.

Explicit Consent: consent which requires a very clear and specific statement on the part of the Data Subject.

General Data Protection Regulation (GDPR): the General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.

Information and Records Management: the application of systematic policies and procedures governing the creation, distribution, maintenance, management, use and ultimate retention or disposal of records to achieve effective legal, economical, accountable, transparent and efficient administration.

Lawful basis: the processing of data must be performed under a lawful basis. Personal data may be processed:

- On the basis that the data subject has provided consent to do so
- On the basis that it is necessary in order to enter into or perform a contract
- On the basis that there is a legal obligation for the processing
- Where Capital Credit Union has a legitimate interest in processing the data
- In order to protect the vital interests of the data subject
- In the public interest.

Personal Data: means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing or Process: means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Records: documents in every format created and received by individuals or organisations in the course of conduct of affairs and accumulated as evidence of these activities.

Relevant Filing System: Is any set of information that, while not computerised, is structured by reference to individuals, or by reference to criteria relating to individuals, so that specific information is accessible.

Special Categories of Personal Data: information revealing:

- Personal data revealing racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data and biometric data processed for the purpose of uniquely identifying a natural person
- Data concerning health
- Data concerning a natural person's sex life or sexual orientation.

Supervisory Authority: means the national independent authority responsible for upholding the fundamental right of individuals in the EU to have their personal data protected. The Office of the Data Protection Commissioner (ODPC) is the Irish supervisory authority for the Data Protection Acts 1988-2018, the General Data Protection Regulation (GDPR). It also has functions and powers related to the Irish ePrivacy Regulations (2011) and the EU Law Enforcement Directive.