Privacy Notice of Mallow Credit Union Limited – Mortgage

Version 1.0 – July 2025

Mallow 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 above-mentioned objectives. This notice provides you with information around the use of your data for mortgage lending and administration purposes.

Our contact details are:
Mallow Credit Union - Head Office
Address: 135 Bank Place, Mallow, Co. Cork.
Phone: (022)21121
E-mail: info@mallowcu.ie

Data Protection Officer:
Phone: (022)21121
Contact: dpo@mallowcu.ie

Mallow Credit Union is committed to protecting the privacy and security of your personal data and to complying with enhanced legal obligations and responsibilities under the General Data Protection Regulation (GDPR) and the Data Protection Acts 1988 – 2018. 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, retain, store, and use the following categories of personal data about you:

- Your personal details (name, previous names, address, previous address, title, date of birth, gender, nationality, residency), your contact details (email, phone), financial data, member number, status and history, transaction data, contract data,; tax residency, Tax Identification/PPSN numbers, politically exposed status, , employment details (employer, salary, occupation), certified financial accounts, business ownership, directorship held(if applicable), pension details, retirement age; family details and relationship with joint borrower (spouse, partner, dependents, accommodation status), outgoings and financial commitments (mortgage, finance, bank loans details), credit history, transaction history, details of products and services you hold with us, identification verification documents (photo id, address verification, PPSN verification, birth, marriage certs, separation agreement, Divorce Decree if applicable), , first time buyer, criminal sanctions; signature (wet signature and/or digital signature and/or electronic signature), interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone recordings, nomination details.

We may also collect, store and use "special categories" of more sensitive personal data, e.g. information about your health, including any medical condition, health and sickness (See Insurance for further details).

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 mortgage application and determining your creditworthiness.
- Verifying the information provided by you in the application.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering the mortgage, including where necessary, to take steps to recover the mortgage or enforce any security taken as part of the mortgage.

- We may use credit scoring techniques and other automated decision-making systems to either partially or fully assess your 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 (based on your explicit consent).
- To comply with our obligations under the Criminal Justice Act 2018.
- To administer house insurance details in connection with your mortgage application.

We need all the categories of information in the list above to allow us to; identify you and contact you and in order that we perform our contract with you.

We also 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.

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 will use certain "special categories" of data as follows:
• To administer life insurance details in connection with your mortgage application

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 as specified by National or European Union Law (where applicable), and in line with our data protection policy.
3. Where it is needed in the substantial public interest as authorised by National or European Union Law, and in line with our data protection policy.
4. Where we require to process it for purpose of insurance on a loan.

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.

How we keep your personal data safe?
We use a variety of technical controls and organisational security measures to protect your personal data from unauthorised access or misuse including identification and authentication control mechanisms, firewalls, password security measures, intrusion detection systems, strong security facilities and systems.

Please note that Mallow Credit Union facilitates remote working for its employees. In this regard, your data and all processing related to it may be accessed by an employee working from home. The data processed, and how it is processed, remains the same as when the employee is working within MCU offices, and all relevant and necessary security measures remain in place to ensure the integrity and confidentiality of your data.

Sharing Your Personal Data
Where you have given your explicit consent and authorisation, we may share your personal data with your authorised personal representative(s) for the purpose of administering your account(s). We may share your personal data with national regulatory and law enforcement authorities but only where we have a legal obligation to do so.

We may share personal and anonymous information with agents, subsidiaries, affiliates, partners and other third parties that perform functions on our behalf, such as hosting, billing, content management tools, customer service, fraud

protection and legal as applicable. These entities have access to the personal information needed to perform their functions and are obligated to maintain the confidentiality and security of that personal information. The service providers are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services, for example:

a. our legal and professional advisers such as auditors and external legal counsel;
b. trade / representative bodies;
c. any sub-contractors, agents or service providers engaged by Mallow Credit Union (including our employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, outsourced shredding company and suppliers of other back office functions;
d. credit reference, debt recovery or fraud prevention agencies;
e. payment recipients and other financial institutions;
f. guarantors;
g. joint account/loan holders;
h. In relation to marketing, we may use the following third-party service providers named below to process and store your data: - SensorPro (Narragansett Technologies), which we use to manage email marketing subscriber lists and send emails to our subscribers. Read their privacy policy here https://sensorpro.net/privacy/- Google LLC, we use Google Analytics service to measure the performance of our website. Read their Privacy Policy here https://policies.google.com/privacy - WordPress.org whose WordPress software (and associated add-ons) we use to manage the content of our website. Read their Privacy Policy here https://wordpress.org/about/privacy/ We will not share your personal information with or sell it to third-party marketers.
i. We may also share your personal information with any third parties to whom you have instructed us to share your information with.
j. We are required to co-operate by law with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, the courts, fraud prevention agencies or other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting.

k. We share your information with our Current Account Services providers. PAYAC Services CLG are the appointed coordinator and programme manager for participant credit unions
l. If you apply for a mortgage, then your data will be shared with the following data processors: Wellington IT, BCM Global ASI Limited and Credit Logic for the loan decisioning credit assessment.

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. 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.

We only use third-parties with whom we have a binding contract and this contract contains specific clauses in relation to protecting your personal data, these include:
Confirmation that the third-party agrees that:

- All personal data received from us shall be stored securely.
- Appropriate technical and organisational measures are in place to protect the data it stores and processes.
- Data shall only be accessed by authorised personnel who are bound by a duty of confidentiality.
- The data will not be shared with any unauthorised outside third parties.
- No sub-processors shall be engaged to process the data without us being notified in advance and giving our consent.
- It will only process data as per our instructions and for specific purposes outlined in our agreement.
- In the event of an incident occurring that has a material impact on the data, it shall notify us immediately upon becoming aware. It shall, at all times, cooperate with us with regard to such incidents.

- Upon completion of the specific processing instructed by the Data Controller, specific retention periods apply that must be complied with.
- At our request by, it shall make available all information required to demonstrate compliance with its obligations under data protection legislation.

Third Parties
To meet our obligations under the law in this regard, we will ensure that we have a contract in place with includes "Standard Contractual Clauses" approved with the European Commission, in place prior to the transfer of any data. This ensures an adequate level of protection of your personal data in a way that is consistent with and which respects the EU laws on data protection.

The credit union utilises a third party Outsourced Service Provider, **BCM Global ASI Limited and Credit Logic Limited,** who carry on the business of, inter alia, servicing, administering and managing mortgage loans secured on residential properties in Ireland. This business will support the credit union in the processing, fulfilment and special servicing (arrears management) of residential mortgages based on a standardised consistent and reliable methodology and is therefore of ultimate benefit to its member.

For this service **Mallow Credit Union Limited** is the data controller and BCM Global ASI Limited are a data processor for the purposes of data protection legislation.
The BCM Global privacy notice can be viewed at https://www.bcmglobal.com/privacy-notice/
The Credit Logic Limited privacy notice can be viewed at https://creditlogic.com/privacy-policy/

The credit union utilises a third party valuation management solutions company, **VMS,** who provide, inter alia, valuation management services on residential properties in Ireland. This service will ensure that valuations are carried out by professional valuers and that the valuations follow mandatory valuation standards and is therefore of ultimate benefit to its members.
For this service **Mallow Credit Union Limited** is the data controller and VMS are a data processor for the purposes of data protection legislation.
The VMS privacy statement may be viewed at https://www.vmsireland.ie/termsandconditions.html

BCM Global ASI Limited stores data on physical servers with a third party storage solution company, **Kefron Limited**, to ensure safe, secure storage of Title Deeds and security documents and is therefore of ultimate benefit to its members.
The Kefron Limited privacy statement may be viewed at https://kefron.com/privacy-statement/

The credit union provides your information to insurance companies for the purpose of insuring the loan.

Planned data transmission to third countries
There are no plans for a data transmission to third countries.

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 loans assessment and anti-money laundering purposes and compliance with our legal duties in that regard. We may also carry out profiling to tailor our marketing to you by e-mail, on-line, SMS and communication which we will obtain your prior consent before doing so.

Joint Mortgage
Where you hold a joint mortgage, it may result in your personal data being shared with the other joint mortgage party. Where a joint mortgage holder explicitly authorise a third party to administer the mortgage account on their behalf, it may cause your personal data to be shared with that third party.

Personal Data Relating to others
In certain cases, you may provide us with personal data relating to other individuals, this may include, without limitation,

any employees, agents, spouses, partners and personal representatives of the applicant. In providing this information to us, you warrant that you are acting in accordance with the requirements of data protection legislation.
In turn we confirm that we will only process this information for the purposes of processing your mortgage application, administering your mortgage account at any stage, and for any other purposes as have been disclosed to you by us prior to you providing such personal data.

Registering online
We offer our members an online service, this service is optional. We collect some additional information about you when you register your account online. Prior to registering your account, we advise you to read our Website Terms and Conditions, our Cookie Policy, and our Privacy policy. The additional data we will need to collect include a username, email address and contact number. Our legal basis for doing this is legitimate interest.

All information you provide to us through CU Online is stored on secure servers. Any payment transactions undertaken by CU Online are encrypted with TLS technology. Most of the information you submit to CU Online is already held by the credit union except for your unique username and security questions and answers. Your password and PIN are not available to the credit union or the service provider.
The use of the Internet, by its nature, is not always secure. As a result, while we have reasonable IT security measures in place, we cannot guarantee the security or privacy of communications made over the internet including any related to CU Online, the Online Services or your Online Account. For this reason, we cannot ensure or warrant the security of any information you transmit to us, and you transfer the data at your own risk.
You are responsible for providing all you require to access and use CU Online and the Online Services including a computer, an internet connection and security software safely and properly.

If you fail to provide personal data
If you fail to provide certain information when requested, which is necessary for us to consider your mortgage application, we may not be able to process your application successfully. For example, if we require a credit check and you fail to provide us with relevant details, we may not be able to take your loan application further.

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.

Change of circumstances
You agree to notify Mallow Credit Union without delay in the event of any change in your personal circumstances, to enable us to comply with its obligations to keep information up to date.
Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
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.

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.mallowcu.ie or you can ask us for a copy.

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 and 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 is documented in our Records Management and Retention Policy. Once the retention period has expired, the respective data will be permanently deleted/destroyed. Please see some of our main retention periods below:

- Mortgage information is retained for a period of **seven years** from the date of discharge, final repayment, transfer of the loan.
- Letters of offer and credit agreements are **contracts** and as such the credit union retains them for **seven years** from date of expiration or breach, and twelve years where the document is under seal.
- **Mortgage applications** form part of your credit agreement and as such we retain them for **seven years** from the date of discharge, final repayment, transfer of the mortgage.
- **Guarantee information** is retained for **seven years** from the date of default of the borrower or date of demand (**twelve years** under seal).
- **Central Credit Register** enquiry we retain for **five years.**
- Mallow Credit Union utilise Gemview 10 & 10 Touch Tablets (Digipads) which capture digital signatures on forms and documents. Once digitally signed, these documents will automatically be stored in electronic format on your account in line with our retention schedule outlined above.
- **CCTV** footage which is used in the normal course of business (i.e., for security purposes) for **30 days**.
- **Telephone** recordings **1 month.**

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.

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.

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 laws. Due diligence and security assessments are undertaken and third parties are bound by data processing agreements.

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 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): The Savings Protection Scheme (SPS) is a discretionary scheme funded by credit unions affiliated to the ILCU. The scheme is operated by the ILCU and may intervene to provide support to an affiliated credit union which finds itself in difficulty. 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 Services CLG – Payac Services CLG are the programme coordinators for the provision of Current Account Services to members of Mallow Credit Union Ltd and the processor of electronic payments services on your account (such as credit transfers, standing orders and direct debits). If you use our electronic payment services to transfer money into or out of your credit union account or make payments through your debit card into your credit union account, we are required to share your data with our electronic payments service provider. We have a contractual obligation to provide personal data to Payac & Intesa Sanpaolo, the payments services provider to the credit union.

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

Insurance – Life Savings/Loan Protection: 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.

Certain Loan Types: for certain loan types, such as mortgages, the Credit Union may need to share your details with other 3rd party software providers or service providers but will only do so to enable it to fulfil our contract with you.

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.

Online Loan Applications and Issuance: If you apply for a loan from the credit union, then the data will be shared with the following data processors:

- Wellington IT
- BCM Global ASI Limited
- Credit Logic

These organisations are processing the data under the instruction of the credit union and the credit union remains the data controller for the submitted data and all other related data records. Retention rules are in line with previously stated retention rules for loans.



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 obligations under the Credit Union Act 1997(as amended) and other financial services legislation and codes of practice and to comply with our legal obligations to 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 and make checks 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, the Financial Services and Pensions Ombudsman Bureau of Ireland, the appropriate Supervisory Authority if required under law.

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 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 Act"), 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.

ISBAR: We are obliged, under the Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR), to submit information in relation to accounts identifiable by IBAN, and Safe Deposit Boxes to the Central Bank of Ireland. This information relates to account owners and persons who are authorised to provide instructions regarding that account on behalf of the account holder as well as information in relation to safe deposit boxes offered by credit institutions. In line with legislation this information may be further accessed by the Financial Intelligence Unit within An Garda Síochána, the Criminal Assets Bureau (CAB), other branches of An Garda Síochána and Revenue Commissioners. There will be no public access to ISBAR.

CESOP (EU cross-border payments reporting): We are obliged, as a Payment Service Provider, to collect and report data on cross border payment transactions. This means that we are required to keep a record of payment transactions and report them to the tax authorities. The services that are within scope include, Card payments (debit and credit cards) (card present and non-card present), Credit and bank transfers (including swift), Direct debits (SEPA and non SEPA), E-money payment, Money remittance transactions. We are required to retain these records in an electronic format for a period of 3 years (from the end of the calendar year of the date of the payment). This data will be aggregated within CESOP and made available to designated staff within each tax administration.

PEP: The 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), ("the Act") places legal obligations on Financial Institutions including Credit Unions to take steps to determine whether or not a member or a beneficial owner connected with a member; is a Politically Exposed Person (PEP) or an immediate family member or a close associate of a Politically Exposed Person. We are obliged by law to record and retain Politically Exposed Person details.

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/overdraft 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/overdraft 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 the guarantor to the CCR. Mallow Credit Unions credit policy stipulates that a credit report is run on any unsecured loan over €500 and any secured loans over €2,000. For all mortgage applications, we are obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a mortgage is granted, we are obliged to report both personal details and credit details of the borrower to the CCR.

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 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.



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 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.

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 to determine your suitability for the loan applied for. When using the services of the Central Credit Register, we will pass them your personal details and details of your credit performance.

Please review the CCR Data Protection Statement which is available at https://www.centralcreditregister.ie/borrower-area/data-protection-statement/

Personal Data from Others

Where you provide to your credit union personal data relating to individuals (which for these purposes shall

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

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	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 / overdraft application in order that they contact you and details of the indebtedness in order that they recover the outstanding sums.	**Our legitimate interest:** The credit union will take appropriate steps to protect the assets and equity of the credit union and its members. We will ensure that outstanding debts are recovered to maintain financial and organisational stability and to provide the credit union with an effective and consistent debt recovery remedy.
Judgements Searches: We carry out searches in Stubbs Gazette 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.	**Our legitimate interest:** To ensure that the credit union for its own benefit and therefore the benefit of its members engage in responsible and prudent lending practices. To facilitate a case by case approach to our lending and to provide a complete financial position to facilitate proper evaluation of your ability to repay the loan.
CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security, public safety and the prevention and detection of crime. About 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 crime.	**Our legitimate interest:** To secure and monitor our property and offices to protect our staff, volunteers, members & visitors. To assist in the prosecution of offenders, for the purpose of crime prevention and detection, to identify accidents and incidents and to assist in the resolution of disputes in relation to over-the-counter financial transactions.
Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information and quality of service.	**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 and to resolve any disputes quickly and accurately.
Email: We use email to send, transmit and receive general information, personal information, financial information, special category data or sensitive category personal data.	**Our Legitimate Interest:** To provide the credit union and our members with a safe, secure, reliable, and effective transmission and communication facility for general, personal, financial, sensitive, and special category data.
Operational Emails: We will send operational emails to members that are directly affected by a change in the operations of products or services that they hold.	**Our legitimate interest:** The Credit Union, where appropriate, needs to communicate operational information direct to affected users of products and services if the operational change impacts on the members ability to use the service. This is limited to instances that materially affect the user and will not contain any marketing messages.

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

Marketing and Market Research

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may include using the Irish League of Credit Unions and/ specialist market research companies. See section on Your Marketing Preferences. In addition, we may wish to contact our members and inform them of new products, further services, loans, or promotional notices that may be of interest. Under the General Data Protection Regulation (GDPR) we must have your consent to contact you or send you marketing material or promotional notices. Should you wish to receive such notifications you will be required to complete the "Consent to Contact" form available at our offices, we will stop processing your personal data once you inform us that you wish to withdraw your consent to marketing.

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 Policy' published on our website. (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 Policy' web page so you may distinguish them from other categories). For more information on how to manage cookies, including how to disable cookies please visit: www.allaboutcookies.org.

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 that to be 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.

You have the right to object to automated processing, including profiling.



Request the restriction of processing of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances, e.g., direct marketing Opt-Out request



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**.



Right of Data Portability. You have the right to 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 (01)765 0100 **Lo Call Number 1800 437 737** **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 Data Protection Officer in writing. Please see the contact details on the first page.

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 Mallow Credit Union, 135 Bank Place, Mallow, Co. Cork. Phone (022)21121 or info@mallowcu.ie