Privacy Notice of Mallow Credit Union Limited – General

Version 2.6 – January 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 Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes and further processing that may be necessary.

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, depending on the product / service we provide to you:

- Your personal details (name, address, date of birth, PPSN), your contact details (email, phone), financial data, tax residency, politically exposed status, credit checks, employment details (employer, salary, occupation), family details (spouse, dependents, accommodation status), financial commitments (mortgage, finance, bank loans), transaction history with ECU, details of products and services you hold with us, identification verification documents (photo id, address verification, PPSN verification, birth and marriage certs), photograph (digital onboarding), signature (wet signature and/or digital signature and/or electronic signature), CCTV footage, telephone recordings, nomination details, current or past complaints, certified financial accounts (if applicable), interactions with credit union staff and officers on the premises, Primary Account Number relating to provision of current account services (PAN is masked for the credit union), certain information relating to specific loan products (further detailed in our lending privacy statement).

We may need some or all the above-mentioned categories of information. 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).

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

1. In limited circumstances for a specific purpose, 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 necessary for substantial public interest as authorised by National or European Union Law, and in line with our data protection policy.
4. Where we are required 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 necessary to protect your vital interests (or someone else's vital interests) and you are not capable of giving your consent, or where you have already made the special category information public.

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

- To identify you and verify the information provided by you in your application for membership or application for a loan.
- To open, maintain and administer an account(s) for you.
- To process, administer and maintain membership of an account for a child (*under 16*).
- To contact you about your account, to perform our contract(s) with you and to respond to requests you may make to us.
- To facilitate and administer credit union products and services you have requested from us.
- To provide updates on our loan products and services by way of directly marketing to you (with your consent).
- To comply with Central Bank Regulations, to determine whether you are a connected borrower or related party borrower.
- To comply with our legal obligations for example, Anti-Money Laundering legislation and beneficial ownership reporting obligations.
- To meet our legal and compliance obligations under the Credit Union's Standard Rules.
- To purchase loan protection and life savings protection from ECCU and when acting as an insurance intermediary.
- To conduct credit searches and make submissions to the Central Credit Register.
- To assess your loan application and determine your creditworthiness for a loan.
- Verifying your financial data using Open Banking and/or by you supplying supporting documentation in order to process your loan application.
- We may use credit scoring techniques and other automated decision-making systems to either partially or fully assess your loan application. Any fully automated decision making process will be processed under the legal basis of performance of a contract and your explicit consent.
- To administer your loan and where necessary, take steps to recover the loan and enforce any security taken as part of the loan.
- Where you have been nominated by a member of Mallow Credit Union Limited to receive the property of the credit union account of that member.

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 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 holders;
h. For agri loans, we share information with our third party suppliers Collaborative Finance CLG and Visualyse.
i. 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.
j. We may also share your personal information with any third parties to whom you have instructed us to share your information with.
k. 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.
l. Other banks or payment service providers, payment schemes or systems (e.g. SWIFT, VISA or MasterCard), digital wallet providers, merchant acquirers and providers of payment processing services
m. We share your information with our Current Account Services providers. PAYAC Services CLG are the appointed coordinator and programme manager for participant credit unions, FIS Global provide a card issuing and transaction processing service for the issuance of debit cards, FIS also engage sub processors – Gemalto are card manufacturers. Transact Payments Malta Ltd are the Bank Identification Number (BIN) sponsor. 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.
n. If you apply for a loan, then your data will be shared with the following data processors: Wellington IT, Metamo, Fern IT for the automated loan decisioning and Plaid B.V. for the purpose of credit assessment through Open Banking services.

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.

Planned data transmission to third countries
We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with relevant data protection legislation. Where we authorise the processing / transfer of your data to the UK (which is a third country), the data is transferred based on an adequacy regulation by the EU in respect of the UK. Where we authorise the processing / transfer of your data to a country where the European Commission has not made an adequacy decision, we require your personal information to be adequately protected using standard data protection contract clauses that have been approved by the European Commission.

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/Group Accounts and/or Joint/Group Loan Accounts
Where you hold, open, or operate a joint/group account and/or a joint/group loan account, it may result in your personal data being shared with the other joint/group account holder(s) or joint/group loan account holder(s). Where a joint /group account holder(s) or joint/group loan account holder(s), where permitted, explicitly authorise a third party to administer the account/loan account on their behalf, it may cause your personal data to be shared with that third party.

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 relevant personal information when requested, we may not be able to perform the contract we have entered with you or we may be prevented from complying with our legal obligations and as a result we may be obliged by law to cease providing our services to you.

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.

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/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:

- A**ccounting** records required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than **six years** from the date to which it relates.
- The **money laundering** provisions of anti-money laundering legislation require that certain documents must be retained for a period of **five years** after the relationship with the member has ended.
- We keep **income tax** records for a period of **six years** after completion of the transactions to which they relate.
- **Membership Applications** and all associated supporting documentation relating to our share accounts is retained for a period of **seven years** after the relationship with the member has ended.
- Records evidencing the **history of services and transactions** carried out in relation to you will be retained for a period of **seven years** from account closure.
- **Members Nominations** are retained for **seven years** after the relationship with the member has ended.
- Documentation relating to the provision of our **current account and debit card** services will be retained for **seven years** from termination of members relationship with us.
- Further to the Credit Union Act 1997 (as amended) Member **counter transaction dockets** must be retained for not less than **five years** from the date to which it relates.
- **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.
- **Loan/overdraft** information is retained for a period of **seven years** from the date of discharge, final repayment, transfer of the loan / cancellation or termination of the overdraft.
- **Loan/overdraft 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 loan / cancellation or termination of the overdraft.
- **Guarantee information** is retained for **seven years** from the date of default of the borrower or date of demand (**twelve years** under seal).
- **Declaration of Health** forms are retained until a loan is repaid or a new DOH completed and approved.
- **Central Credit Register** enquiry we retain for **five years.**
- **CCTV** footage which is used in the normal course of business (i.e., for security purposes) for **30 days**.
- **Telephone** recordings **13 months.**
- **e-AGM recording, attendance list and online poll results** are retained for **3 months after the AGM or until AGM Minutes are finalised whichever is the latest.**
- Member **complaints** are retained for **six years** after the complaint has been resolved.
- 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.

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 legal basis is appropriate when processing is necessary to facilitate, administer and manage your account(s), loans and credit union services and products you have with us or have requested from us

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 and to facilitate processing your membership and any other applications you make with us. We will use it to maintain and administer any accounts you have or may have with us, to process applications for products and services you have or request from us. We will use it to process and facilitate your entry for the competitions organised by the credit union and to access and facilitate any loan / overdraft applications you make or request from us.

Security: If you apply for a loan with us 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.

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 must 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.

Credit Assessment: If you apply for a loan or overdraft with us, the credit union will take several factors into account and will utilise personal data provided from:

- your application form including your loan supporting documentation,
- your existing credit union file and account history,
- credit reference agencies such as the Central Credit Register (CCR) managed by CRIF on behalf of the Central Bank of Ireland.

Open Banking, services provided by Plaid B.V. Plaid B.V. is registered in the Netherlands and is regulated by the Dutch Central Bank to provide AISP (Account Information Service Provider) services within member countries in the European Economic Area. Please note that Plaid B.V. is a data controller and maintains a controller-to-controller relationship with the credit union. Plaid collects end user data, i.e. member account related information directly from the member's bank or other account provider based on the explicit consent of such member. Please refer to Plaid's privacy policy available at this link: https://plaid.com/legal/#end-user-services-agreement-eea

The credit union then utilises this information to assess your credit application in line with the applicable legislation and the credit unions lending policy.

Automated Loan Decisioning: We may use automated decision making as part of our loan/credit decision process, and which involves assessing your application for a loan, taking account of your current circumstances and evaluating your ability to meet the required repayments on the loan. The automated decision process involves different types of information, such as information included in your loan application – as to the amount requested, the repayment period, your income, employment details, other loans or overdrafts etc. – as well as information provided to us with your explicit consent as to any account(s) held by you with any other financial institution, and your credit history with the Central Credit Register. The Credit Union uses this information to apply internal credit assessment rules in a consistent manner, and ensures that your application for a loan is treated fairly and efficiently and what is believed to be consistent with your repayment capacity.

Certain Loan Types: for certain loan types, either determined now or to be determined at any time in the future, 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: We may use information about your account and interactions with us 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
- Metamo
- Fern IT

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 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 (CRS) as provided for by Section 819F of the Tax Consolidation Act 1997. 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.

Purpose of the loan: If you apply for a loan with us, we are obliged to ensure that the purpose of the loan or any loan approved by us falls into one of our approved categories of lending.

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 Owners, the Financial Services and Pensions Ombudsman Bureau of Ireland, the appropriate Supervisory Authority if required under law.

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 Payment Reporting (“CESOP”), the Central Register of Beneficial Ownership of Trust (“CRBOT”) and the Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR). This reporting obligations require 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.

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.

Incapacity to Act on your account: The Decision Support Service (DSS) is a public body established within the Mental Health Commission by the Assisted Decision-Making (Capacity) Act 2015. Following commencement, it will keep a searchable register for the following types of arrangements:

- Co-decision-making agreements
- Decision-making representation orders
- Enduring powers of attorney

Approved professionals and organisations including credit unions will be able to search the register to:
- Confirm that an arrangement exists and is active
- See the details of the arrangement
- Get a copy of the arrangement

Credit union will have the right to search the register should it become evident that the relevant person may not have the full capacity to make decisions on their financial affairs. For further information please view DSS Data Protection Statement available at https://decisionsupportservice.ie/data-protection-statement.

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 guarantor to the CCR. Mallow Credit Unions lending policy stipulates that a credit report is run on any unsecured loan over €500 and any secured loans over €2,000.

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.

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.

e-AGM recording: As provided by Section 81(6) of the Credit Union Act 1997 (as amended) the secretary must keep minutes of all general meetings of the credit union. Mallow Credit Union records the e-AGM meetings, including attendants listing and poll results in order to assist us in preparation of the AGM Minutes.

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 must tell you what that is.

Credit Assessment and Credit Reference Agencies: When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from credit referencing agencies such as the Central Credit Registrar (see legal duty).

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/

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

Our Legitimate Interest: To provide the credit union and our members with a safe, secure, reliable, and effective

information, special category data or sensitive category personal data.	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.
Winners Details: Where you are a winner in our competitions, we publish your details which may include a photograph of the winner's presentation on our website, Facebook page, credit union newsletter and other media outlets.	**Our legitimate Interest:** To inform our members of the winning results, to ensure the draw results are open and transparent. To ensure the continuing integrity of the members competitions by making public the winning results.

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/or 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.

Art Competition

This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information and asked for your consent to the processing of personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Schools Quiz

This credit union is involved in the Schools Quiz in liaison with the ILCU. The School 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. This information is processed only where consent has been given. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms.

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.

Prize Draw

This credit union may organise occasional free of charge prize draws for its members as a reward for being an active member and/or using our products/services. The members might be automatically included in draws subject to each draw specific terms and conditions. No consent may be required to participate, and winning members may be contacted directly to be notified about the draw results.

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 data. 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 data. 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 data, object to the processing of your personal data, or request that we send you a copy/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 data. 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