Privacy Notice of Mallow Credit Union Limited – Guarantors

Version 1.1 – February 222

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

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, store, and use the following categories of personal data about you:

Data Category	Data	Example of how we use it
Contact and Identifying Information	Name, address, Eircode, telephone number, email, proof of identity, photographic identification/passport details, proof of address documents, proof of PPSN documents, signatures, account number and membership of other credit unions	We use this information to verify your identity, to send you information and process application(s) for membership, products or services. We use it to respond to your queries, to send you AGM notices, to comply with our legal obligations and regulatory requirements.
Demographic details	Age, date of birth, gender, Eircode	We use this information to verify your identity, to send you information and process application(s) for membership, products, or services. We use it to respond to your queries, to send you AGM notices, to comply with our legal obligations and regulatory requirements.
Personal Data	Tax Identification Number/PPS, tax residency, accommodation status, mortgage details, details of credit union products you hold with us.	We use this information to process application(s) for membership, products, or services, to respond to your queries, to comply with regulatory requirements and legal obligations including our obligations under anti-money laundering legislation.

Financial Data	Bank account details/statements, transaction data, account balance, payments information debit/credit, personal bank statements, credit card statements, occupation, employment status, income and outgoings details, salary, other income, other financial commitments, source of wealth, source of funds,	We use this information to assess application(s) for products or services, to process your transactions with us, to monitor and analyse transactions and financial behaviour, to comply with our legal obligations, to detect and prevent financial crime and cyber-attack. We share information with third parties to prevent financial crime, report fraud and manage risks.
Searches	Information obtained from other parties such as credit reference agencies, the Central Credit Register, other joint account holders and guarantors' details.	We use this information to assess your application(s) for products and services, to comply with our reporting obligations, and for loan related purposes.
Personal Information	Emails, telephone messages and telephone call recordings, IP address, online identifiers (i.e. cookies).	We use this information to keep a record of your interactions with us, respond to your queries and for training and quality purposes and to respond to any disputes quickly and accurately.
Personal Data	Images from CCTV footage in and around the credit union premises.	We use CCTV for security purposes, and to assist in the prevention and detection of crime.

Purpose for which we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union;
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/ member getting into arrears;
- Collection of the debt; and
- Conduct due diligence/credit checking;
- In order to meet reporting obligations to the Central Credit Register.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

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, considering any legal/contractual obligation to keep it. We document the reasons for our retention periods and where possible the retention periods themselves in our Retention Policy. Your details will be held for seven years following default of the borrower, date of demand, discharge, transfer or repayment of the loan.
Once the retention period has expired, the respective data will be permanently deleted If you require further information, please contact us.

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.

How we may share the information

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU)[1] and our advisers such as solicitors, debt collectors or auditors. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal data with our regulator the Central Bank of Ireland as required to comply with the law. The Privacy Notice of the ILCU is available at www.creditunion.ie.

Under the Credit Reporting Act 2013 lenders are required to provide personal and credit information for credit applications and credit agreements of €500 and above to the Central Credit Register. This information will be held on the Central Credit Register and may be used by other lenders when making decisions on your credit applications and credit agreements. Guarantors who provide guarantees or indemnities in respect of other loans will also be included at a future date. The Central Credit Register is owned and operated by the Central Bank of Ireland. For more information see www.centralcreditregister.ie

Data we provide to the Central Credit Register (CCR) in respect of your loan will now be shared with the Central Statistics Office (CSO). (The Statistics Act 1993 provides that the CSO may obtain information from public bodies including the Central Bank).Personal data held on the Central Credit Register includes your name, date of birth, address, gender, telephone number and personal public service number (PPSN). Your PPSN, Eircode and contact telephone number is not transferred to the CSO. The Central Bank is the data controller for the Central Credit Register and the obligations of the GDPR and general and data protection law apply to them. Please refer to the www.centralcreditregister.ie for more information.

The Central Statistics Office, (CSO) is the data controller for the information when it is transferred to them and the obligations of the GDPR and Data Protection law apply then to the CSO. More information in relation to the CSO is available at www.cso.ie

Cookies

We may obtain information about your general Internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can "remember" you on your return visit. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate. For more information on how to manage cookies, including how to disable cookies please visit: www.allaboutcookies.org

Our use and your information

Our legal basis for processing personal data supplied by you for the purpose of this guarantee is in furtherance of this contract and legitimate interest if we conduct a credit search with our credit referencing agencies or if due diligence is conducted for e.g., photo identification and address verification.

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 on the basis of 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

[1] The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring (audit) services to affiliated credit unions. We may disclose information in the guarantee form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

require your personal information to be adequately protected using standard data protection contract clauses that have been approved by the European Commission.

Complaints

Mallow Credit Union endeavors to meet the highest standards when collecting, using, storing and destroying your personal information. We urge you to notify us if you think that our processing activities are unfair, misleading, or inappropriate. We also welcome any suggestions for improving our procedures. This guarantor privacy notice aims to provide you with comprehensive detail of all aspects of our data processing. However, we are happy to provide any additional information that may be necessary. All complaints, queries or suggestions should be addressed to the Data Protection Officer at the Contact details set out above.

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	**Postal Address: Data Protection Commissioner**
Lo Call Number 1800 437 737	**21 Fitzwilliam Square South, Dublin 2, D02 RD28**
Web Form: https://forms.dataprotection.ie/contact	**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