Privacy Notice of Mallow Credit Union Limited - Nominations

Version 1.2 – February 2024

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

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 information. This privacy notice describes how we collect and use personal information about you before and after the nomination process.

Nominations

- The ability of a member aged 16 and over to nominate individuals to receive property in their credit union account on their death is a unique facility available for credit union members under the credit union legislation by which we operate. The nominated property does not form part of a deceased person's estate.
- The member may nominate a person(s) of choice to receive their property (i.e., shares) in the credit union presently up to a maximum value of €27,000. Any amount in excess of this balance forms part of the member's estate and must be dealt with in accordance with the law.
- The information relating to you as nominee has been provided to us by the member during their lifetime.
- A member may change the details of their nomination as often as they like during the course of their membership with the credit union. In addition, there may be instances where a nomination is revoked through marriage or civil partnership, or the death of the nominee before the nominating member. There is therefore no guarantee that a nomination will be valid until the member has passed away and the validity of the nomination is confirmed by the credit union. As such, we are unable to contact individuals directly to advise them that we are processing their information.
- Where a member makes a nomination, we are required under the credit union legislation by which we operate to keep a record of all persons nominated (along with any revocation or variation of any nomination).
- As this is the first time we have communicated with you in relation to the nomination, we are required under data protection legislation to provide you with the information contained within this privacy notice.

Why we collect the information and how we use it

We may collect, retain, store, and use the following categories of personal data about you, depending on the product / service we provide to you:

Data Category	Data	Example of how we use it
Contact and Identifying Information	Name, address, Eircode, telephone number, proof of identity, photographic identification/passport details, proof of address documents, signatures	We use this information to record your details in our register of nominations, identify you, to contact you and then upon order upon the passing of the member, to process the nomination (subject to a valid nomination) and transfer any nominated

		property to you, the nominee(s), to comply with our legal obligations and regulatory requirements.
Financial Data	Bank details	We use this information to process payment / transfer of nominated property.
Family and Beneficiary Data	Relationship to member	We use this information to facilitate and process payment/transfer of nominated property and to comply with our legal obligations and regulatory requirements and to provide you with credit union services and to facilitate the administration of members' accounts.

How we collect the information

We collect personal information about nominees from the following sources:

- Nomination form completed by the member.
- ID&V and bank details provided by you, the nominee(s).

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as the Irish League of Credit Unions (ILCU)[1] and our professional advisers such as solicitors 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 information with our regulators or other third parties (such as persons administering the deceased estate) as required to comply with the law.

Data Retention Periods

We will retain permanently, your name in our Deceased Members Book. Member nomination forms (and any other documentation related to the nomination will be retained for a period **seven** years after the relationship with the member has ended (e.g., the member passing away).

Once the retention period has expired, the respective data will be permanently deleted If you require further information, please contact us.

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.

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 at any of our offices.

[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 services to affiliated credit unions. We may disclose information in the nomination form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

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 Commission** **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