

Affinity Credit Union Limited, Main Street, Cashel, Co. Tipperary. E25 CX21. Telephone 0818 222 919. E-Mail info@affinitycu.ie.
Data Protection Officer: Telephone 0818 222 919. E-Mail: dpo@affinitycu.ie.

Affinity 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 during and after your relationship with us.

This Privacy Notice provides you with information on the processing of information about you for account related purposes and other general purposes. If you apply for a loan with us, you will be provided with our Lending Privacy Notice to take account of further processing that may be necessary.

Purpose of Data Collection, Processing or Use

A credit union is a member-owned financial cooperative, operated for the purpose of providing credit at competitive rates, promoting thrift, 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.

Personal Data Used

We may collect, store, and use the following categories of personal information about you:

☒ *Your name, address, date of birth, email, telephone financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings.*

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

Why we process your personal data

We process your personal data to

- ☒ open and maintain an account for you;
- ☒ meet our obligations to you under the Credit Union's Rules
- ☒ contact you in respect of your account and any product or service you avail of; and to
- ☒ comply with our legal obligations, for example anti-money laundering, to identify connected borrower.

We may also collect, store and use "special categories" of more sensitive personal information including 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 information. We may process special categories of personal data in the following circumstances:

- ☒ in limited circumstances, with your explicit written consent;
- ☒ where we need to carry out our legal obligations and in line with our data protection policy;
- ☒ where it is needed in the public interest, and in line with our data protection policy.

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.

Security of 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.

Failure to Provide Personal Information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.

Change of Purpose

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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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 anti-money laundering purposes and compliance with our legal duties in those regards.

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 information is documented in our retention periods, as set out below. Once the retention period has expired, the respective data will be permanently deleted.

- ⊗ **Accounting records**, further to the Credit Union Act 1997, as Amended, must be retained for not less than six years from the date to which they relate.
- ⊗ **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.
- ⊗ **Income Tax** records are required to be retained for a period of six years after completion of the transactions to which they relate.
- ⊗ **Loan application** information is retained for a period of six years from the date of discharge of the loan
- ⊗ **CCTV Footage** which is used in the normal course of business (i.e. for security purposes) is retained for one month.
- ⊗ **Telephone Recordings** are retained for one month.

Planned Data Transmission to Third Countries

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

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. We will notify you of changes where appropriate.

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, to assess this application, to process applications you make and to maintain and administer any accounts you have with the credit union.

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 do so with respect for the security of your data and will be protected in line with data protection law.

Insurance: We purchase insurance from CMutual, an insurance specialist for Credit Unions, Building Societies and mutual lenders. To administer these insurances we may pass your information to CMutual.

Electronic Payments: 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 share your personal data with our electronic payment service provider Intesa Sanpaolo.

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.



Legal Duty

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

Tax liability: We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction. Where a member is tax resident in another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions.

Under the "Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) (Amendment) Regulations 2015" credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.

Regulatory and Statutory Requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will hold the information about you when you are no longer a member. We may also share information with statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland if required by law.

Compliance with Our Anti-Money Laundering and Combating Terrorist Financing Obligations: The information provided by you will be used for compliance with our member 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.

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external auditor. We will allow the 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 Credit Union Act 1997 (as amended) provides, in the circumstances where you become unable to transact on your account, due to a mental incapability and no person has been legally appointed to administer your account, that the Board may allow payment to another who it deems proper to receive it, where it is just and expedient to do so, in order that the money be applied in your best interests. In order to facilitate this, medical evidence of your incapacity will be required which will include data about your mental health. This information will be treated in the strictest confidentiality.



**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.

CCTV: We have CCTV recording installed on the premises with clearly marked signage. The purpose of this is for security.

Our legitimate interest: With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff /volunteers/members or visitors to the credit union.

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 ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes.

**Your consent**

We will only carry out processing which is based on 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 specialist market research companies.








Your Marketing Preferences

As part of improving our service to you, from time to time, we would like to inform you of goods, services, competitions and/or promotional offers available from us. We may wish to use different means when sending such marketing communications.

You have a right to notify us free of charge at any time that you wish to refuse such marketing by writing to us at our address at the top of this document or by using the "opt-out" options in any marketing message we send you.

Please contact us directly should you wish to change or withdraw your consent.



Your Rights The following are your rights in connection with your personal data.	
	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.
	Request the restriction of processing of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances.
	Where we are processing your data based solely on your consent you have a right to withdraw that consent at any time and free of charge.
	Request that we: a) provide you with a copy of any relevant personal data in a reusable format ; or b) request that we transfer your relevant personal data to another controller where it's technically feasible to do so. <i>Relevant personal data</i> 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 in respect of any processing of your data at		
Post Data Protection Commissioner Canal House Station Road Portarlington R32 AP23 Co. Laois	Telephone +353 (0)57 868 4800 +353 (0)761 104 800 1890 252 231	E-mail info@dataprotection.ie

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 our Data Protection Officer in writing using their contact details above.

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 straight away if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us using our contact details at the top of this document.

