

DATA PRIVACY NOTICE

ST PAUL'S GARDA CREDIT UNION

We understand that the security of the personal data that you entrust to St Paul's Garda Credit Union is of paramount importance to you. We take this responsibility seriously and have put in place controls and security measures to protect your data and your privacy throughout the timeframe that we control this data.

CONTACT DETAILS

If you have any queries on how we manage your personal data then please contact us

Data Protection Officer
St Paul's Garda Credit Union
Floraville, Boreenmanna Road, Cork

enquiries@stpaulscu.ie

021-4313555

You also have the right to complain to the Data Protection Commission or another supervisory authority. You can contact the Office of the Data Protection Commissioner, Canal House, Station Road, Portarlinton, Co. Laois. R32 AP23 Telephone: +353 (0)761 104 800 or 1800 437 737 E-mail: info@dataprotection.ie

COLLECTION AND USE OF PERSONAL DATA

St Paul's Garda Credit Union collects personal data from members, obtains personal data about members from third parties and shares personal data with third parties. The collection and processing of the data is required by St Paul's Garda Credit Union to supply products and services to members and to meet St Paul's Garda Credit Union's legal obligations

FUNCTIONS

The core functions of St Paul's Garda Credit Union are:

- Provision of financial Products and Services to its members including:
 - Account Management
 - Counter Services
 - Credit Control
 - Lending
 - Marketing & business development

- Membership
- In addition to these member facing services the credit union has support services that may involve the processing of member personal data including:
 - Human Resources, Complaint handling and Health & Safety
 - Information technology
 - Risk, Compliance, Internal Audit and Anti Money Laundering
 - Shared services including
 - Payment services including Electronic funds transfer, debit cards and online banking
 - Legislative/regulatory reporting
 - Loan Book and credit analysis
 - Mobile messaging
 - Marketing

The types of personal data processed by St Paul's Garda Credit Union are outlined in detail below

PROCESS

We collect and process your personal information for a variety of reasons and rely on a number of different legal bases to use that information, for example, we use your personal information to process your membership application, to help administer your products and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations.

EXPLANATION OF TERMS

St Paul's Garda Credit Union processes your data based on particular reasons or authorisations and the following section outlines these.

TO COMPLY WITH A LEGAL OBLIGATION

We are required to process your personal information to comply with certain legal obligations, for example:

- to report and respond to queries raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland and An Garda Síochána;
- to comply with tax regulations that require us to report the tax status of our members;
- to verify the personal information provided to us and meet our legal and compliance obligations. To comply with obligations to prevent money laundering, tax avoidance, financing terrorism and fraud, certain personal data in relation to you, such as your name, date of birth and correspondence address will be shared with Stubb's Gazette;
- to perform credit checks in the event you apply for a loan and to supply information to the Central Credit Register and to use the Central Credit Register when considering loan applications to determine your borrowing options and repayment capacity and/ or facilitate other lending institutions to carry out similar checks;
- to cooperate and provide information requested in the context of legal and/or regulatory investigations or proceedings;
- to keep records of communications and member account activities;
- to maintain a register of members of the Credit Union;

- to administer our internal operational requirements (including credit, compliance and risk management, system development, staff training, accounting and for audit purposes);
- to communicate with you through certain mandatory service communications such as providing notice of the AGM; and
- to undertake systems testing, maintenance and development and in order to ensure network and information security.

TO ENTER INTO AND PERFORM A CONTRACT WITH YOU FOR THE SERVICES OR PRODUCTS WHICH YOU REQUIRE

In order to consider your application for membership of St Paul's Garda Credit Union and to process any product/service applications which you may make, we have to gather some personal information, for example

- the administration of accounts
- payments,
- deposits,
- lending, and credit decisions.

As part of this process, St Paul's Garda Credit Union may be required to share personal information to an intermediary or counterparty

All sharing of data is subject to protocols and controls to mitigate the risk to your data and maintain your data subject rights

LEGITIMATE INTERESTS

In certain circumstances, St Paul's Garda Credit Union processes your personal information on the basis of the legitimate interests of the Credit Union. In doing so, St Paul's Garda Credit Union ensures that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of St Paul's Garda Credit Union and your privacy rights, for example:

- to collect due and outstanding debt which may involve passing your personal information to debt collection agencies;
- to keep records of communications, including telephone lines, if required in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- to perform research and analysis aimed at improving St Paul's Garda Credit Union's products, services and technologies; and
- to establish, exercise and safeguard St Paul's Garda Credit Union rights, including where necessary to take enforcement action) and to respond to claims made against St Paul's Garda Credit Union.

CONSENT

St Paul's Garda Credit Union uses your personal information to make you aware of products and services which may be of interest to you.

St Paul's Garda Credit Union will only communicate from a marketing perspective where you have expressed explicit consent for St Paul's Garda Credit Union to do so and the manner of this communication will be in accordance with your preferences.

St Paul's Garda Credit Union processes your personal information in the Irish Life Referral process. This is based on your consent and requires us to document this consent and only share the data required to enable Irish Life to contact you. Documented consent will be retained for 6 years.

You can at any time withdraw that consent.

Where consent is required for a process St Paul's Garda Credit Union will outline what the effect of refusal of consent will imply with respect to the particular product or service being offered.

DATA PROTECTION

All personal data that is entrusted to St Paul's Garda Credit Union is subject to protocols and controls that manage the safety and security of the data.

RECORD MANAGEMENT

The controls and practices in place in St Paul's Garda Credit Union manage your data from the time it enters into St Paul's Garda Credit Union until it is destroyed. Aspects of these processes include:

- why the data is collected so that St Paul's Garda Credit Union only collects the necessary amount of personal data
- what risks to your data St Paul's Garda Credit Union needs to manage
- the training of staff in protecting your data and only using it for the documented purpose
- how long St Paul's Garda Credit Union will keep/retain the data and how it will be destroyed
- **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 Policy. Once the retention period has expired, the respective data will be permanently deleted.

- Member data will be destroyed in line with the following retention rationale
- Where transactions are conducted in a particular year they will be retained for an annual audit cycle unless a legal requirement requires a longer period e.g.
- Accounting 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 at least a period of five years after the relationship with the member has ended (Anti Money Laundering Act 2010 Section 55)
- We keep income tax records for a period of six years after completion of the transactions to which they relate (Companies Acts and Taxes Consolidation Act, 1997)
- Credit agreements, Loan applications and any supporting documentation may be held indefinitely based on current judicial requirements
- Health & Safety accident reports are retained for 10 years (Safety health and Welfare at Work (General Applications Regulation 1993, section 60)
- Accounting 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.

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

Consent documentation for sharing your contact data in the Irish Life Referral process will be retained for 6 years from date of sharing

All aspects of the life of your data while it's entrusted to St Paul's Garda Credit Union are documented and managed

INFORMATION SECURITY

St Paul's Garda Credit Union has put security controls in place to minimise the potential for your data to be unintentionally released. Aspects of these controls include:

- How St Paul's Garda Credit Union protects paper records and access to these records
- How St Paul's Garda Credit Union protects the computer infrastructure where personal data resides in electronic form
- How St Paul's Garda Credit Union ensures that where data is shared with others then there are similar or greater controls in place so your data security is maintained

While St Paul's Garda Credit Union will do all it can to secure your data if, in the unlikely event that, a breach of data occurs St Paul's Garda Credit Union will notify any affected parties as soon as possible and that St Paul's Garda Credit Union's breach management process will be enacted

DATA SHARING

St Paul's Garda Credit Union must share personal data in order to comply with legislative requirements and to enable the credit union to provide products and services to members.

Where St Paul's Garda Credit Union shares data with a third party then this will be subject to a defined process. Aspects of St Paul's Garda Credit Union process include

- How St Paul's Garda Credit Union assesses third parties and their data protection practices
- How St Paul's Garda Credit Union monitors the performance of the third party; and
- How St Paul's Garda Credit Union transfers the data to the third party in a manner that reduces risk

Your data will be shared with the following organisations if you elect to take the following products/services

- If we issue you a debit card, Transact Payments 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 here
 - <http://currentaccount.ie/files/tpl-privacy-policy.pdf>
- If you partake in the Irish Life Referral service then the data controller for all aspects of the relationship following the referral process will be Irish Life.

- 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 here
- <https://www.irishlife.ie/ilfs-privacy-notice/>

It is St Paul's Garda Credit Union's policy that any member data transferred to another organisation should be subject to at least the same level of protection and controls as if it stayed within St Paul's Garda Credit Union

YOUR RIGHTS

If your personal data is processed by St Paul's Garda Credit Union, you have certain rights in relation to that data, which are outlined in summary form below. St Paul's Garda Credit Union may require further information from you before we can respond to your request. The scope of certain rights may be subject to certain restrictions or exceptions provided for under data protection legislation.

If you have any queries in respect of how St Paul's Garda Credit Union manages and protects your personal data then please contact our Data Protection Officer (dpo@stpaulscu.ie)

RIGHT OF ACCESS

You have the right to receive a copy of the personal data St Paul's Garda Credit Union holds about you as well as information about how it is used.

APPLICABILITY

This right is applicable at all times when St Paul's Garda Credit Union holds your personal data.

RIGHT TO RECTIFICATION

You have the right to ask St Paul's Garda Credit Union to correct personal data we hold about you where it is incorrect or incomplete.

APPLICABILITY

This right is applicable at all times when St Paul's Garda Credit Union holds your personal data.

RIGHT TO ERASURE

This right entitles you to require the erasure of your personal data from St Paul's Garda Credit Union's systems and records. However, this right applies only in certain circumstances (e.g. where St Paul's Garda Credit Union no longer needs the personal data for the purpose for which we collected it or where you withdraw consent to our use of your personal data and where there is no other legal basis for continuing to use it).

APPLICABILITY

This right does not apply where personal data is required for the purpose of compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official

authority. Therefore, this right is not applicable in respect of much of the personal data held by St Paul's Garda Credit Union in the performance of its statutory functions.

RIGHT TO RESTRICT PROCESSING

This right entitles you to restrict the processing of your personal data by St Paul's Garda Credit Union. Where this right is exercised, St Paul's Garda Credit Union is still permitted to store your personal data but other use of the data is prohibited, save in certain limited circumstances.

APPLICABILITY

You can exercise this right if one of the following applies:

- You contest the accuracy of the personal data held about you and St Paul's Garda Credit Union is verifying the accuracy of the data
- The personal data has been processed unlawfully and you oppose erasure and request restriction instead
- St Paul's Garda Credit Union no longer needs the personal data but you need the data in connection with a legal claim
- You have objected to processing and St Paul's Garda Credit Union is considering whether its legitimate grounds override your rights and interests.

RIGHT TO DATA PORTABILITY

This right allows you to obtain your personal data in a format that enables you to transfer that personal data to another organisation where St Paul's Garda Credit Union is processing your personal data on the basis of consent or on the fulfilment of a contract and if processing is carried out by automated means. You may have the right to have your personal data transferred by us directly to the other organisation, if this is technically feasible.

APPLICABILITY

This right does not apply where personal data is required for the purpose of compliance with a legal obligation or for the performance of a task carried out in the public interest or in the exercise of official authority. Therefore, this right is not applicable in respect of much of the personal data held by St Paul's Garda Credit Union in the performance of its statutory functions.

RIGHT TO OBJECT

You have the right to object to St Paul's Garda Credit Union's use of your personal data in certain circumstances. However, St Paul's Garda Credit Union may continue to use your personal data, despite your objection, where there are compelling legitimate grounds to do so or we need to use your personal data in connection with any legal claims.

APPLICABILITY

This right applies where St Paul's Garda Credit Union processes your personal data for the performance of a task carried out in the public interest or in the exercise of official authority or in pursuance of its legitimate interests.

RIGHT RELATING TO AUTOMATED DECISION MAKING AND PROFILING

You have the right not to be subject to a decision based solely on automated processing (without human involvement) where that decision produces a legal effect or otherwise significantly affects you.

APPLICABILITY

As St Paul's Garda Credit Union currently does not make any automated decisions, this right is not applicable.

RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent to the processing of your personal data by St Paul's Garda Credit Union at any time. This will not affect the lawfulness of our processing before the withdrawal.

APPLICABILITY

This right only applies where the sole legal basis for processing your personal data is your consent.

RIGHT TO COMPLAIN TO DATA PROTECTION COMMISSIONER

You have the right to lodge a complaint with the Data Protection Commissioner if you think that St Paul's Garda Credit Union has not processed your personal data in accordance with data protection legislation.

APPLICABILITY

This right applies at any time.

EXERCISING YOUR DATA SUBJECT RIGHTS

If you wish to exercise any of your data subject rights, then please use St Paul's Garda Credit Union 's standard Data Subject Rights Request form. This form is available from any of St Paul's Garda Credit Union's office or from our website

All completed Data Subject Rights Request forms can be submitted to

Data Protection Officer

St Paul's Garda Credit Union

Floraville, Boreenmanna Road, Cork

dpo@stpaulscu.ie

UPDATES

This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be displayed on our website.

(23rd Sept 2021)