

## Privacy Notice of St. Paul's Credit Union Limited – General

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 facilitating the abovementioned 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 if you apply for a loan with us.

Our contact details are:

Head Office

Address: Boreenmanna Road, Cork, T12 TN67.

Phone: (021) 4313355

E-mail: [enquiries@stpaulscu.ie](mailto:enquiries@stpaulscu.ie)

Data Protection Officer.

Contact: [dpo@stpaulscu.ie](mailto:dpo@stpaulscu.ie)

St. Paul's Credit Union is committed to protecting the privacy and security of your personal data. 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:

- 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, online identifiers (i.e. cookies)

### The credit union will use your personal data to assist it in carrying out the following:

- open and maintain an account for you.
- To meet our obligations under the Credit Union's Standard Rules.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligation for example anti-money laundering obligations.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- In order to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Verifying your financial data using Open Banking and/or by you supplying supporting documentation.
- Using credit scoring techniques and (as applicable) other automated decision-making systems to assess your loan application
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.

- We may use credit scoring techniques [and other automated decision-making systems] to either partially or fully assess your application. Any fully automated decision making process will be processed under the legal basis of performance of a contract & your explicit consent.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and services by way of directly marketing to you.
- When acting as an insurance intermediary, to meet our obligations.

For Mortgage Applications, Supplementary information may be required.

We may also collect, store and use the following “special categories” of more sensitive personal data:

- Information about your health, including any medical condition, health and sickness (See Insurance for further details)

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

We also need your personal identification data to enable us to comply with legal obligations. 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 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, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. Where it is needed in the public interest, and in line with our data protection policy.

Less commonly, 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.

#### **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 Joint Data Controllers in the specific process<sup>1</sup>. 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.

#### **If you fail to provide personal data**

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.

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<sup>1</sup> As a joint data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.

### **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.

### **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.

### **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 Policy. Please see our data retention schedule below

Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- 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 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.
- Loan application information is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.
- CCTV footage which is used in the normal course of business (i.e. for security purposes) for one month.
- General telephone recordings which are used for information and training purposes, and such recordings are held for up to 12 months. Certain calls, if forming part of another process, may be retained for longer periods in line with the retention requirements of the underlying process.
- 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.
- 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)
- Consent documentation for sharing your contact data in the Irish Life Referral process will be retained for 6 years from date of sharing

### **Planned data transmission to third countries**

There are no plans for a data transmission to third countries

### **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

### **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, for the purpose of assessing this application, processing applications you make and to maintain and administer any accounts you have with the credit union.

**Security:** In order 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 law.

**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 will 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):** 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](http://www.creditunion.ie)

For the processing 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 payment service provider. We have a contractual obligation to provide personal data to Payac, Intessa Sanpaolo Bank & Nexi, the payments services providers to the credit union.

**Debit Card:**

If we issue you with 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 on <https://currentaccount.ie/files/tpl-privacy-policy.pdf>

**Insurance:** 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:** When assessing your application for a loan, the credit union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing credit union file,
- credit referencing agencies such as the Central Credit Registrar (CCR) managed by CRIF on behalf 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 loan 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.

**Member Service:** We may use information about your account 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 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) 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.

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

**Purpose of the loan:** We are obliged to ensure that the purpose of the loan falls into one of our categories of lending.

**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 Act”) (and any subsequent AML legislation)

**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 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.

**Credit Reporting:** Where a loan 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 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 shortly to the CCR.

**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.

**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 team’s family or a business in which a member of the Board /Management Team has a significant shareholding.

**ISBAR:** We are obliged to 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



**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.

**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 in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency, we will pass them your personal details and details of your credit performance.

<p><b>Debt Collection:</b> 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 application in order that they make contact with you and details of the indebtedness in order that they recover the outstanding sums</p>	<p><b>Our legitimate interest:</b> The credit union, where appropriate will necessary take steps to recover a debt to protect the assets and equity of the credit union</p>
<p><b>Judgements Searches:</b> We carry out searches in order to assess your credit worthiness to repay a loan.</p>	<p><b>Our legitimate interest:</b> The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit history 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</p>
<p><b>CCTV:</b> 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 fraud.</p>	<p><b>Our legitimate interest:</b> 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 and to prevent and detect fraud.</p>
<p><b>Voice Recording:</b> We record phone conversations [both incoming and outgoing] for the purpose of verifying information and quality of service. These calls are managed via zoom plc &amp; service cloud</p>	<p><b>Our legitimate interest:</b> 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 quickly and accurately resolves any disputes</p>
<p><b>Member Relationship Management:</b> We track and manage contacts initiated by members to ensure allocation of resources effectively and</p>	<p><b>Our legitimate interest:</b> To ensure a good quality of service - member initiated calls and emails are tracked via our Service Cloud relationship management tool. This is to allow for improved service responsiveness and allocation of internal resources.</p>



responsiveness to member queries, requests and instructions.	
<b>Operational Emails:</b> We will send operational emails to members that are directly affected by a change in the operations of products or services that they hold	<b>Our legitimate interest</b> 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
<b>Limited Direct Marketing:</b> We may send directed marketing messages to members if they meet the criteria laid down by the data protection commissioners rules for electronic and direct marketing	<b>Our legitimate interest</b> The Credit Union, where appropriate, will communicate marketing messages electronically to members provided the message & the recipient member meet the criteria laid down by the Data Protection Commissioner <a href="https://www.dataprotection.ie/en/organisations/rules-electronic-and-direct-marketing">https://www.dataprotection.ie/en/organisations/rules-electronic-and-direct-marketing</a>



**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/ specialist market research companies. See Marketing Consent Form.

### 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.

### Irish Life Referral:

If you wish to use the Irish Life Referral process, then the CU will, given your explicit consent, share your contact data with Irish Life Ltd. Irish Life are Joint Data Controllers in this process and their privacy notice is available at <https://www.irishlife.ie/ila-privacy-notice/>

### 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](mailto:dpo@stpaulscu.ie))

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.

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



**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.

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



**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).

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



**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.

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.



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.**

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



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 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.

This right applies at any time.

**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 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 straightaway if there are any changes to your personal information.

**St. Paul's Credit Union Limited is regulated by the Central Bank of Ireland**

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

**(17<sup>h</sup> February 2025)**