

Privacy Notice of Nenagh Credit Union Limited Guarantors

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 abovementioned objectives.

Our contact details are:

Address: Credit Union House, Kickham Street, Nenagh, Co. Tipperary

Phone: 067 34444

Email info@nenaghcu.ie

Data Protection Representative Contact: dataprotection@nenaghcu.ie

Nenagh 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, relationship with the borrower for whom you are providing the guarantee, verification of income / employment, confirmation of tax affairs, bank statements, credit card statements, loan statements, financial accounts, social welfare pay-slips, overdraft statements, 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, 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.

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. 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.nenaghcu.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

¹The 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

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.

Our use 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 a credit search /due diligence is conducted.

Purpose for which we process your personal data



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

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.

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.

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 and (in due course) the guarantor. 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 (in due course) to the CCR. Where a loan is applied for in the sum of €500 or more, the credit union reserves the right to make an enquiry of the Central Credit Register (CCR) in respect of the borrower, and in due course of the guarantor in line with our Loan Policy.

Connected 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.



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 suitability as guarantor, the credit union also utilises credit data from credit referencing agencies such 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 information in order to determine your suitability as guarantor. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance.

Please review Central Credit Register Fair Processing Notice which is available <https://www.centralcreditregister.ie/borrower-area/data-protection/>It documents who they are, what they do, details of their Data Protection Officer, how they get the data, why they take it, what personal data they hold, what they do with it, how long they retain it, who they share it with, what entitles them to process the data (legitimate interests), what happens if your data is inaccurate and your rights i.e. right to information, right of access, right to complain, right to object, right to restrict, right to request erasure and right to request correction of your personal data.

Debt Collection: 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.

Our legitimate interest: The credit union, where appropriate will necessary take steps to recover a debt to protect the assets and equity of the credit union

Judgements Searches: We may carry out searches in Stubbs Gazette in order to assess your credit worthiness to repay a loan.

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. In carrying out such a search we can better determine your overall financial position in order to lend to you.

CCTV: 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.

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 and to prevent and detect fraud.

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. We will use the information to contact you in relation to the guarantee and in the event of the loan going into arrears or any other adverse issues on the loan.

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.

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.

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

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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.



Request the restriction of processing of your personal data. 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. '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 57 8684800 +353 (0)761 104 800 Lo Call Number 1890 252 231 E-mail info@dataprotection.ie	Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois
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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 our data protection representative 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 data. If you wish to avail of either of these rights, please contact us at dataprotection@nenaghcu.ie