

St. Raphael's Garda Credit Union Limited

DATA PRIVACY NOTICE

This Data Privacy Notice is effective as and from 23 May 2023

1. Introduction

The purpose of this Data Privacy Notice is to explain how St. Raphael's Garda Credit Union limited (the "Credit Union", "we", "us" and "our") may process your personal information.

A Data Privacy Notice is a document that every organisation who controls and processes personal information must make available. This Data Privacy Notice (together with our Cookies Policy) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It details how we collect, use, disclose, transfer and store your personal information.

This Data Privacy Notice may be updated from time to time and the current version of this Data Privacy Notice shall be displayed on our website. Such amendments will not be made retrospectively.

We will always comply with the General Data Protection Regulation 'GDPR' when dealing with your personal data. Further details on the GDPR can be found at Office of the Data Protection Commissioner's dedicated GDPR website (gdprandyou.ie).

For the purposes of the 'GDPR', we will be the "controller" of all personal data which we hold about you. You can find our contact details at the end of this Data Privacy Notice.

If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this Data Privacy Notice before their personal information is shared with us (e.g. minors).

2. Why do we collect and use your personal information?

We gather and process your personal information for a variety of reasons and rely on a number of different legal basis to use that information. For example, we use your personal information to process your membership application, to help administer your accounts 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, further details are set out in this document.

2.1. 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 in order to meet our legal and compliance obligations, including to prevent money laundering, tax evasion, financing of terrorism and fraud;
- to supply information to the Central Credit Register and in the event you apply for a loan, to perform credit checks with the Central Credit Register to determine your borrowing options and repayment capacity;
- to supply information to the Ireland Safe Deposit Box and Payment Accounts Register (ISBAR);
- to co-operate with and provide information requested to legal and/or regulatory authorities in the context of 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 certain information to you such as providing notice of the AGM;
- to undertake systems testing, maintenance and development in order to ensure network and information security.

2.2. To enter into and perform a contract with you for the services which you require

In order to consider your application for membership of the Credit Union and to process any product/service applications you may make, we have to gather and process some personal information.

Examples of processing include the administration of accounts, payments, deposits, lending and credit decisions. As part of this process, we may be required to pass some personal information to an intermediary or counter-party (e.g. if you perform a payment transaction, we pass information on the transaction to the payee concerned).

2.3. To enable the Credit Union to function as a business

In certain circumstances, we process your personal information on the basis of the legitimate interests of the Credit Union. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of the Credit Union and your privacy rights.

Examples of situations in which your personal information is processed based on our legitimate interests, include:

- to keep records of communications and record telephone calls in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- to tell credit reference and credit registration agencies about your dealings with us including details of your credit facilities and your credit history with us. To search for details of your credit history and information at credit bureaus/ agencies;
- to perform research and analysis aimed at improving our products, services and technologies;
- to establish, exercise and safeguard our rights, including where necessary to take enforcement action and to respond to claims made against the Credit Union;
- to collect due and outstanding debt which may involve passing your personal information to debt collection agencies;
- to inform you about services, products or special offers we may introduce from time to time. You can opt out of receiving this information by contacting us in writing at the below address.

2.4. Where you have provided consent

In the event that you apply for a loan, we may require certain sensitive personal information on your health. You will be asked for your consent to process this type of sensitive personal information. You do not have to provide this information but it may not be possible to provide you with the loan requested if you do not.

3. What personal information we collect about you

The information we hold about you can vary depending on the accounts and services you use. This includes personal information which you give to us when you are applying for membership or applying for a new account or service. It also includes personal information we collect automatically, for instance, your IP address, the date and time you access our services when you visit our website, and personal information we receive from other sources like credit referencing agencies. The personal information we collect about you may include:

- home address, eircode, date of birth, full name, marital status, place of birth, identification documents, garda number, number of dependents, home ownership status, telephone number, email address, signature, eligibility for membership, details of income and source of wealth, nationality and tax identification number;
- details of employment status and occupation;
- sensitive personal information concerning your health;
- information on power of attorney or wardship appointments;
- information obtained from third parties such as credit reference agencies or business information providers;
- information that we gather from publicly available sources such as biographies held on the Internet;
- recordings of calls between you and employees of the Credit Union;
- closed circuit television may be used in and around our premises for the purposes of security and preventing crime, therefore we may have images of you captured by our CCTV cameras;
- information relating to member transactions (such as dates, amounts, currencies, payer and payee details);
- information we learn about you from the way you operate our services and use our website.

4. How the personal information is collected

We collect personal information from a number of sources, including:

- information we receive directly from you or from a person acting on your behalf;
- information we obtain from third parties such as credit reference, debt recovery or fraud prevention agencies, which may have originated from publicly accessible sources;
- information that we gather from publicly available sources such as the Internet.

5. How we use Cookies

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can "remember" you on your return visit. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate. For more information on how to manage cookies, including how to disable cookies please visit: www.aboutcookies.org.

6. Who we share your personal information with

We share your personal information with trusted third parties who perform important functions for us based on our instructions and apply appropriate confidentiality and security measures, for example:

- a. our legal and professional advisers such as auditors and external legal counsel;
- b. any sub-contractors, agents or service providers engaged by the Credit Union (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- c. credit reference, debt recovery or fraud prevention agencies;
- d. payment recipients and other financial institutions, including insurance providers;
- e. guarantors;
- f. joint account holders.

We may also share your personal information with any third parties to whom you have instructed us to share your information with.

We are required to co-operate by law with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, An Garda Síochána, the courts, fraud prevention agencies or other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting, CRS and FATCA purposes.

We may disclose personal information relating to our members to any third party in the event of a transfer or merger (or potential transfer or merger) of the Credit Union.

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the laws in Ireland. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient or it may require the recipient to subscribe to international data protection frameworks. The Credit Union will always ensure safeguards (i.e. appropriate contractual clauses) are in place transferring any personal data to third countries. For more information about the European Commission's decision on the adequacy of the protection of personal information in countries outside the EEA, please visit: https://ec.europa.eu/info/law/law-topic/data-protection_en

7. Is providing your personal information obligatory?

We are unable to enter into or administer the relationship with you without some personal information about you. In cases where providing your personal information is optional we will make this clear.

8. Updates to your personal information

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us. Our contact details are below.

9. How long we keep your personal information for

We need to keep/store your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above). Even when you close your account with us, we must retain some of your personal information in order to comply with legal and regulatory requirements. The criteria we use to determine data retention periods for your personal information includes the following:

- retention in accordance with legal and regulatory requirements. We will retain some of it after our agreement with you has come to an end, based on our legal and regulatory requirements;
- retention in case of queries. We will retain some of it in case of queries from you (for instance, if you submit an application for a product or service and if that is unsuccessful);
- legal disputes or some other type of dispute with another person or each other.

10. Your rights under data protection laws

You have several enhanced rights in relation to how we use your information including the right to:

- be informed how we use your personal information, access your information and receive copies of your information;
- request that inaccurate/incomplete information is corrected and updated;
- in certain circumstances have your information deleted or our use of your data restricted;
- withdraw consent at any time where processing is based on consent. If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before it is withdrawn;
- exercise the right to data portability (e.g. obtain a copy of your information which we hold and transfer to another provider);
- object to use of your personal data for direct marketing purposes.

In addition, you have the right to complain to the Office of the Data Protection Commissioner which has enforcement powers and can investigate compliance with data protection laws. If you wish to exercise any of these rights you can contact us using the details below.

11. Updates

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

How to Contact Us

If you have any questions about this privacy notice or your personal information, please contact:
Data Protection Officer, St. Raphael's Garda Credit Union Limited, 1-2 Fox & Geese, Naas Road, Dublin 22 or
enquiries@straphaelscu.ie