



WHAT IS GDPR?

GDPR is General Data Protection Regulation which comes into effect on 25th May 2018. The objective of GDPR is to strengthen the protection of personal data for EU citizens, and to standardize the regulations across the EU.

WHO ARE HSSCU?

Health Services Staffs Credit Union Ltd. are one of the largest credit unions in Ireland. We are affiliated with the Irish League of Credit Union (ILCU). Our offices are in the following locations:

Dublin

- HSSCU, 5 High St., Christchurch, Dublin 8
- HSSCU, Phoenix View, 144-150 James's Street, Dublin 8
- HSSCU, 5-6 The Triangle, Ranelagh, Dublin 6

Cork

- HSSCU, St. Gabriel's Branch, 34 St. Patrick's Quay, Cork

Galway

- HSSCU, Mayoralty House, Merchants Road, Galway

Limerick

- HSSCU, 7 Sexton Street, Limerick

Email: info@hsscu.ie | TEL: 016778648 | www.hsscu.ie

DATA PROTECTION OFFICER

Our Data Protection Officer oversees how we collect, use, share and retain personal data to ensure that we abide by our legal obligations. You can contact our Data Protection Officer at dpo@hsscu.ie or by writing to them at Data Protection Officer, Health Services Staff Credit Union, St Gabriel's Branch, 34 St. Patrick's Quay, Cork.

WHAT PERSONAL DATA DO WE COLLECT?

Personal data is any information relating to a living individual which allows either directly or indirectly the identification of that individual. Personal Data can include a name, address or any other detail(s) that is specific to that individual and that would allow the individual to be identified or identifiable.

We collect personal information from you at different stages of your engagement with us e.g. when you open an account, apply for a loan, complete a Nomination Form. We also collect information through other means such as our website, apps, telephone and CCTV recordings.

The following categories of personal data may be collected, retained and processed by HSSCU, including in some cases verification of the personal data:

Name, Address, Previous Addresses, EIR Code, Date of Birth, Email, Phone number, PPSN or Tax Identification Number, Identification documents such as passport/driver's licence and proof of address, Nationality, Country of residence, Staff Number, Signatures including e-signature, Tax Residency, Politically Exposed Status; Financial Data such as accommodation status/mortgage details, payslips, salary information, source of wealth and source of funds; details of the credit union products you hold with us including transaction data and history; interactions with credit union staff and officers in premises, by phone and email, complaints, CCTV footage and telephone voice recordings, nominations, spouse/partner details (by consent) and relationship to existing HSSCU member (when joining as a family



member of). When you apply for a loan online, we collect additional personal data such as username or log data such as time and date of loan applications.

Additional Information required for home loans as follows: Valuation reports, Land Registry folio, Certificate of Title, Life Assurance cover documents – these documents contain the following information – Name, Address, date of birth, property value, member’s solicitor’s name, address and contact details and medical data. Source of Funds. Personal legal documents such as Separation/Divorce Agreements (if applicable), Confirmation of Gift letter (if applicable). Salary certificate completed by Employer. Where self-employed, tax clearance certification, audited accounts, Revenue Notice of Assessments, Business bank account statements.

WHAT SPECIAL CATEGORIES OF DATA DO WE COLLECT?

“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.

As part of our service to members, we provide insurance which we purchase from ECCU Assurance DAC, (“ECCU”). This is a life insurance company, wholly owned by ILCU. This includes Life Savings (LS), Loan Protection (LP). If you chose to take 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. If you opt for Loan Repayment Protection Insurance, we will be required to share your information with CMutual Group Services (Ireland) (“CMutual”) also. This information will be shared with CMutual to allow it deal with insurance underwriting, administration and claims on our behalf.

WHAT LAWFUL BASIS DO WE HAVE FOR PROCESSING PERSONAL DATA?

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 such as membership, the provision of loans, the provision of mortgages, electronic transfers and insurance.

- **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. This includes circumstances where a borrower either defaults or indicates risk of default on their loans. If this should occur with you, we and/or agents will engage to assist you in re-establishing adherence to an agreed arrangement. Changes to the contract may have a bearing to the overall cost of credit and credit reporting and this will be discussed with you as part of the process.



➤ **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. **This will be a requirement on a mortgage loan.** To maintain and administer home loans, we may need to share your information with our solicitors, Piers Fitzgibbon Solicitors.

➤ **Third parties:** We may appoint external third parties to undertake operational functions on our behalf e.g. service providers of fraud detection software and support services who may use that information to monitor and help identify potential fraud. 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.

➤ We engage third party providers (RW Pierce) to assist with our common bond analysis. No analytics are carried out on data where individuals are identifiable. All data is anonymised before it is analysed. Our providers may in-turn share this data with the Irish League of Credit Unions (ILCU) to facilitate the compilation of accurate statistical information of the overall Credit Union sector. This data would be used by the ILCU for national and regional analysis as well as in providing valuable sectoral information which could be used for advocacy purposes, such as when engaging with government on behalf of Credit Unions.

➤ **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 HSSCU Ltd. 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

➤ **Credit Assessment:** When assessing your application for a loan or overdraft, the credit union will take a number of factors into account and will utilise personal data provided from your application form, supporting documentation, your existing credit union file and credit referencing agencies such as the Irish Credit Bureau (prior to 1st October 2021) and the Central Credit Registrar. The credit union then utilises this information to assess your application in line with the applicable legislation and the credit unions lending policy. We sometimes use partial automated decision making to improve the efficiency of our processes. The assessment is done in accordance with our internal credit assessment rules to and is subject to human intervention and oversight to ensure its application is fair.



As part of our loan assessment process, you will have the option to avail of Open Banking through an intermediary service provider called CRIF Realtime Ireland Ltd ('CRIF'). CRIF is an 'Account Information Service Provider' or AISP. An authorised AISP can ask for permission to access bank account data and use information to provide a service. CRIF is authorised by the Central Bank of Ireland. You will be given the option to share your account data (e.g. bank statements) with HSSCU using CRIF. None of your information will be shared without your consent. At no point do we ever see or have access to your banking passwords. HSSCU cannot in any way affect your bank account. Further information on this service can be found on our website.

- **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.

- **Loan Repayment Protection Insurance:** We purchase insurance from CMUTUAL Services (Ireland) ('CMUTUAL'), a company registered by the Central Bank of Ireland and who in respect of lending, provide loan repayment protection insurance. This insurance is underwritten by Maiden Life Försäkrings AB (Maiden Life), a company registered in Sweden, no. 516406-0468 and Maiden General Försäkrings AB (Maiden General), a company registered in Sweden, no. 516406-1003. Maiden Life and Maiden General are regulated in Sweden with regulatory passporting rights to underwrite business in Ireland. If you choose to take out a loan with us, you can opt to avail of this insurance. In order that we apply this, it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with CMUTUAL to allow it deal with insurance underwriting, administration and claims on our behalf. Please refer to the Policy Documents provided with this insurance for further information.

- **Payac:** For the purposes of processing electronic payments services on your account (such as credit transfers, standing orders and direct debits), providing current account, debit card and related services to our members, the Credit Union is a participant of Payac Services Company Limited by Guarantee ("Payac"). Payac is credit union owned and operated company that assists participating credit unions in obtaining regulatory approval, developing, implementing and providing ongoing support for payment account services. This includes among other activities assisting in the establishment of operating standards, negotiating third party services and outsourcing arrangements in behalf of participating credit unions.

- **FIS:** Fidelity National Information Services ("FIS") is a data processor acting on our behalf through Payac for the administration of our card services associated with your current account. This service includes monitoring for and prevention of financial crime, reporting of fraud and other related activities to protect our members from financial loss.

- **Debit Card:** If we issue you a debit card, we will share transactions details with companies which help use to provide this service. 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 here <http://currentaccount.ie/files/tpl-privacy-policy.pdf>



- **Insurance Intermediary:** When acting as an insurance intermediary, to meet our obligations
- **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) Regulations 2008” credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which includes PPSN where held.
- **Regulatory and statutory requirements:** To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorized people to see our records (which may include information about you) for reporting, compliance and auditing purposes. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013. For the same reason, we will also hold the information about you when you are no longer a member. We conduct loan book reviews for the purposes of provisioning calculations – this involves analysing loan performance data to accurately predict the rate of default and set aside appropriate reserves within the credit union to meet this. We will process your data to investigate and resolve complaints and errors on your account or service provided to you. We may also share information 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 if required by law. When acting as an insurance intermediary, to meet our obligations. We may also be required to disclose information by or to a court or in the course of an insolvency process, where a borrower has availed of a debt resolution mechanism
- **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 and any subsequent AML & CTF legislation. We perform checks on members and authorised parties which includes adverse media checks, screening against external databases and sanctions lists and establishing status as politically exposed persons or relatives or associates of. We monitor and screen transactions for the purpose of preventing and detecting crime. This may require us to investigate and gather intelligence on suspected financial crimes, fraud and threats and share this data with law enforcement and authorities designated in law. We may share data with other banks and third parties to help recover funds lodged to your account in error or by misdirection by a third party. We must file reports on the Beneficial Ownership Register, the Beneficial Ownership Register for Certain Financial Vehicles (“CFV”), on the Bank Account Register, the European Union Cross-Border Payments Reporting (“CESOP”), the Central Register of Beneficial Ownership of Trusts (“CRBOT”) and the Ireland Safe Deposit Box and Bank Account Register (ISBAR). This reporting obligations requires the credit union to submit certain member data to the relevant authority administering the registers, such as the Central



Bank of Ireland or the Revenue Commissioners. For further information, please contact the credit union directly.

- **For third parties authorised:** As flagged, we are obliged to report accounts which have an IBAN associated to Ireland's Safe Deposit, Bank and Payment Account Register (ISBAR). ISBAR is managed by the Central Bank of Ireland. Along with information related to the Account Holder, it also includes information on those acting on behalf of a member through a formal authorisation e.g. Power of Attorney. Personal details such as name, address and date of birth related to the third party individual are provided to ISBAR. Further information on ISBAR can be found at [ISBAR FAQ | Central Bank of Ireland](#)

- **Audit:** To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an internal and external 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. This applies to single accounts only.

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

- **Credit Reporting:** Where a loan is applied for (which includes an overdraft facility) 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 applied for (which includes an overdraft facility) in the sum of €500 or more, the credit union may make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted (which includes an overdraft facility) 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.

- **For Guarantors:** The Credit Reporting Act 2013 and the Regulations provide the legal basis for the collection and processing of credit and personal information. From 1 February 2025, lenders must submit personal and credit information for guarantees for loans entered into or after 1 February 2025. As guarantor, we have a right to request a copy of your credit report. Your credit report will contain full information on those loans in your own name, and limited information for any loans you have guaranteed. Your role in a loan, whether you are a borrower, co-borrower, or guarantor will be shown on the credit report.

*** Central Credit Register (CCR)**

- The Central Credit Register (CCR) is a national mandatory database of personal and credit information. Personal data held includes name, address, date of birth, gender, telephone number and personal public service number (PPSN. Credit data held on the CCR includes the loan type, such as mortgage, credit card, overdraft, personal loan, business loan, HP, PCP etc; the amount borrowed and the amount outstanding. Information submitted by Financial Institutions each month is used to create a credit report which is stored on the CCR. This information will be released only when a lender or the borrower to whom the information relates requests access; if the borrower to whom the information relates, consents to the release of this information to another person; as provided by the Credit Reporting Act 2013, the Data Protection Act 2018 or as required or permitted by law or any other applicable legislation. For more information, including on how your data is processed, see www.centralcreditregister.ie.

- **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. To maintain and administer home loans, we may need to share your information with our solicitors, Pierse Fitzgibbon Solicitors, so that they may provide legal services to us

- **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 teams family or a business in which a member of the Board /Management Team has a significant shareholding.



Legitimate Interest 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 below

Credit Assessment and Credit Reference Agencies: When assessing your application for a loan or overdraft, 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 (CCR), and prior to 1st October 2021 the Irish Credit Bureau (ICB).

ICB searches will no longer take place after 1st October 2021. Applications prior to this may have been subject to an ICB search.

Debt Collection: Where you breach the loan agreement or overdraft facility, 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.

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

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 and to ensure accuracy of member transactions.

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 credit applied for. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance

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

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.

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, to prevent and detect fraud



Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, quality of service and consents

Strategy, Statistical Analysis and Credit Union Financial Performance: As part of our commitment to making informed decisions about products and services we provide to our members, we utilise data analytics to analyse our common bond performance. This is done via a third party (currently RW Pierce). We do not use data in its original state where individuals can be identified, and no analytics are carried out prior to anonymisation of the data. The only processing exception is our geo-location application, which transforms addresses into small area codes to prevent individual households from being identifiable.

Member Satisfaction Surveys: To help us improve and measure the quality of our products and services, we undertake member satisfaction surveys from time to time. This may include using specialist market research companies to aid us in the process. Co-operation in these surveys is voluntary. We do not ask members to share financial or sensitive information as part of the survey

Risk Management: As part of internal administration, we undertake statistical analysis of engagement through the various channels and departments, research and planning. We do this for management, financial and regulatory reporting. We also seek to improve internal business processes, with focus to member experience, compliance requirements, fraud prevention protection and cost effectiveness in delivery. This can include quality assurance testing and analysis of complaints, errors and feedback.

Social Media Engagement:

We operate social media channels so that we can present, inform, and interact with our members and other visitors interested in our services. This involves analysing in aggregated form the reach and use of our social media channels by such visitors.

and to ensure accuracy of member transactions.

Our Legitimate interest: 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.

Our Legitimate interest: This analysis, conducted by a trusted third-party provider under contract, ensures that we act in the legitimate interests of our members, who are the ultimate owners of the credit union, and safeguard the financial stability of the credit union into the future.

Our Legitimate interest: To help us improve and measure the quality of our products and services. To ensure a good quality of service, to assist in training, to use the feedback in the design and delivery of improvements to our products and services. To grow our business and develop new products and services

Our Legitimate interest: This analysis is done to ensure that the credit union is operated in a responsible and prudent manner. It helps us target areas of risk so that we can manage them better.

Our Legitimate interests: The legal basis for which we rely on to process personal data is our legitimate interests in optimising our engagement and communication of our business activities to our members and other interested parties.

Where it relates to Children: We will not process data (photos, videos of children at events for example) that relates to children under the age of 16



years unless we have the explicit consent of the appropriate adult.

Note:

The use of social media by HSSCU does not in any way imply an endorsement of the relevant providers and/or their privacy policy. The ideas and views expressed by HSSCU on social media are for information purposes only. No communication through social media shall be deemed to constitute legal or official notice on behalf of HSSCU. We follow some social media channels, however, being followed by us does not imply an endorsement of any kind. We reserve the right to not reply individually to messages or comments received on social media.

The Data Protection Commissioner (the "DPC") has produced guidance to assist users in safeguarding their privacy when using social media. You can find this information [here](#)

Mortgage Lending and Transfer/Assignment of Mortgage

When assessing your application for a mortgage loan the credit union may use the information which it obtains about you and the secured property, for the purposes of servicing the mortgage and the secured property, credit checks which may involve group reporting and management purposes, any transfers or other dealings with the secured property, the mortgage and the mortgage conditions.

The credit union may share the information it obtains when assessing your application for a mortgage loan for the said purposes and for the following:

- any (or any proposed) assignee, transferee, mortgagee, chargee, sub-mortgagee, sub-chargee, trustee or other grantee or dispose or successor and their respective officers employees agents and advisers;
- any other person directly or indirectly participating in or promoting or underwriting or managing or auditing (or proposing to do so) any transfer, assignment disposal, mortgage, charge, sub-mortgage, sub-charge, trust securitization scheme, mortgage backed promissory note facility or other transaction or arrangement relating to or involving the mortgage and the conditions attached to the mortgage;
- agents and advisers of your credit union and
- Any other party to whom you have agreed the credit union may disclose your information, each of whom in turn may use that information for the above and other purposes which have been disclosed to you.

You agree to notify your credit union without delay in the event of any change in your personal circumstances, to enable your credit union to comply with its obligations to keep information up to date.

Personal Data from Others

Where you provide to your credit union personal data relating to individuals (which for these purposes shall include, without limitation, any employees, agents, spouses, partners and personal representatives of the persons included in the expression Mortgagor) you warrant that you are acting in accordance with the requirements of the Data Protection legislation in providing that information to your credit union for the purposes set out in your mortgage for the purposes set out in this clause and for such other purposes as have been disclosed to you by your credit union prior to you providing such personal data to your credit union.



Your Consent We will only carry out processing which is based on your consent and will cease processing if/when you withdraw your consent.

Sometimes we need your consent to use your personal information. With **direct marketing** for example, we need your consent to make you aware of products and services which may be of interest to you. We may do this by phone, post, email, text or through other digital media. You can decide how much direct marketing you want to accept when you apply for new products and services. You have the choice to opt out, by using the 'unsubscribe' option in any marketing message we send to you. You also have the right to notify us free of charge at any time that you wish to refuse such marketing by contacting us using one of the contact options provided at the beginning of this Notice.

Information on online activity

If you use our website, we may collect information about your online activity using technology known as cookies. They can be controlled through our cookie consent banner and/or through our 'Cookie Declaration' web page. (Please note some cookies are essential for the website to operate and so your consent is not required for these, but these are also clearly set out in our cookie consent banner and 'Cookie Declaration' web page so you may distinguish them from other categories). More information on Cookies is explained further down in this Notice.

We also use third-party providers to aid us in the promotion and delivery of our services to you. These are, where applicable, set out within the information notices referenced above but also on our 'Privacy Policy – website' web page, which explains further what services we use and provides links on ways you can manage your engagement with these parties (separate to any choice you have made via our consent mechanism).

Authentication Services

When you use our Authentication Services, whether via the app or through our website, we process personal data which includes but is not limited to your mobile number, email, username, details of your activity and security credentials which you created when you registered. You can access your account online via the app by activating the biometric and facial recognition features on your phone. This will also allow you to complete transactions online using the biometric features you have authorised through your phone. When applicants for membership seek to join the credit union online or members submit their identification documents online to us, we use biometric facial recognition technology to capture and verify the individual against the identification documents the applicant/member has provided during the process. The process may also include using that technology to copy information from your documents to information on your application.

Where biometric features are applied, we employ these steps with your permission because we have a legal obligation to ensure secure customer authentication when a member is transacting online and for the purposes of identifying suspicious behaviour (e.g. identity theft) and fraud prevention.

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 provisioning, loan assessment and financial crime prevention purposes and compliance with our legal duties in those regards. Where high risk threats are identified, these are investigated, and we may need to suspend account services for the safety and security of the account or debit card.



HOW SECURE IS MY INFORMATION?

Any information which is provided by you is treated with the highest standards of security and confidentiality and in accordance with our legal and regulatory obligations. All personal information provided by you is securely stored using controls to limit who can access it. We use a variety of measures to ensure the safety and security of your information, such as encryption, strong passwords, CCTV, restricted access and alarms.

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. The recipient of the information will also be bound by confidentiality obligations.

WHAT IF I DON'T WANT TO SHARE CERTAIN PIECES OF INFORMATION?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you as we may be prevented from complying with our legal obligations. One of the principles of GDPR is Data Minimisation, whereby we only ask for what we need to carry out a service or provide a product for you, so when we do ask for personal data, it is in order to provide you with a product or service. We are required to share personal data with certain third parties such as the Central Credit Register, Revenue etc.

INTERNATIONAL TRANSFERS OF DATA

We will only transfer your information outside of the EEA where the same standard of data protection applies, or appropriate safeguards are in place. This may include transfers to countries approved by European Commission as having an adequate level of protection and/or use of appropriate safeguards such as Standard Contractual Clauses or Binding Corporate Rules.

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.

You agree to notify your credit union without delay in the event of any change in your personal circumstances, to enable your credit union to comply with its obligations to keep information up to date.

We have prepared individual privacy notices for the different occasions our members will engage with us such as opening an account, applying for a personal loan or mortgage. These set out how we process your personal data when providing those services to you. These can be found on our website.

COOKIES

When using our website or mobile application, we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to help us provide a better service, to record session information and/or to assist you in browsing the website. This may in some instances only be statistical data about how you browse our website. Some of the cookies we use are essential for the website to operate.

Third parties such as Facebook may use cookies, web beacons, and other storage technologies to collect or receive information from our website/app and elsewhere on the internet and use that information to provide measurement services and target ads. For more information on Cookies and how you can



manage them, please see our Cookies Policy, which is available on our website on the 'Cookie Declaration' page. You may also learn more about third party services we use in our 'Privacy Policy – Website' page.

OTHER WEBSITES & EXTERNAL LINKS

Our website contains links to other websites. The inclusion of a link on this website does not imply endorsement of the linked website by us. We are not responsible for the content or privacy practices of any third parties or other websites. We encourage you to read the privacy statements and/or policies on other websites you visit to familiarise yourself with how your personal data is processed.

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. Please contact us using the details provided at the start of this document, so that we can make the necessary changes/updates.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA FOR?

Record	Retention Period
Membership Application	7 Years after relationship has ended
Nomination Forms	7 Years after relationship has ended
CCTV recording	One Month
Telephone Recordings	7 years
Copies of ID Proof of Address	5 Years after relationship has ended
Loan application forms	7 Years from date of discharge, final payment or transfer of loan. Extended to 13 years where related to home lending.
Overdraft application forms	7 years from termination of the overdraft facility
Loan Supporting Documentation	7 Years from date of discharge, final payment or transfer of loan. Extended to 13 years where related to home lending.
Overdraft Supporting Documentation	7 years from termination of the overdraft facility
Letter of Sanction	7 years from termination of the overdraft facility
Credit Agreements	7 Years from date of discharge, final repayment, or transfer of loan. Extended to 13 years where the document is under seal
ICB Enquiry (ceases 1 st October 2021)	5 Years from date of access
CCR Enquiry	5 Years from date of access
Rescheduled Loan Request	7 Years
Temporary Arrangements	7 Years
Guarantees	7 Years from the date of discharge, final repayment or transfer of the loan. Extended to 13 years where the document is under seal
Lodgement/Withdrawal documents	5 Years
Member Complaints	6 Years after the complaint has been resolved
Insurance Product Sale Documentation	6 Years
Loan Protection/Life Savings Claims Documentation	6 Years after the relationship has ended
Declaration of Health Forms	Until loan is repaid



Please note that these retention periods are our policy but are also subject to legal, regulatory and business requirements, which may require us to hold the information for a longer period. For example, we must meet minimum retention standards for our Anti Money Laundering requirements. External agencies, such as the Gardai in specific circumstances can request we retain data for longer than our internal schedules.

WHAT RIGHTS TO I HAVE OVER MY PERSONAL DATA UNDER GDPR?



To find out whether we hold any of your personal data and **if we do, to request access** to that data by being 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.

'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.

Please note that the above rights are not always absolute and there may be some limitations



EXERCISING YOUR RIGHTS

If you want to 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 at HSSCU, St. Gabriel's Branch, 34 St. Patrick's Quay, Cork or by email at dpo@hsscu.ie. You can also exercise your rights by calling into your local branch or telephoning us on 01 677 8648.

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.

MAKING A COMPLAINT

If you have a complaint about the use of your personal information, please let a member of staff in your branch know, giving them the opportunity to put things right as quickly as possible. If you wish to make a complaint you may do so in person, by telephone, in writing and by email. Please be assured that all complaints received will be fully investigated.

You have a **right to complain** to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone: +353 1 7650100 / 1800437737	Postal Address:
Web form: : https://forms.dataprotection.ie/contact	Data Protection Commission
	21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

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.hsscu.ie or you can ask us for a copy.