



General Privacy Notice of St. Francis Credit Union Limited

St. Francis 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. 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:

Address:	Friars Walk, Clonroad, Ennis, Co. Clare
Phone:	(065) 6828305
Email:	info@stfranciscu.ie
Website:	www.stfranciscu.ie
Data Protection Officer Email:	dataprotectionofficer@stfranciscu.ie

Purpose of Data Collection, Processing or Use

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.

What personal data do we use?

We may collect, store, and use the following categories of personal data about you:

- Your name, member number, address, date of birth, email, telephone number(s), financial data, status and history, credit history, transaction data, contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, income verification, bank statements, tax status, outgoings, accommodation status, mortgage details, property details, previous addresses, marital status, spouse details, partners details, spouse/partners income details, dependents details, nominations, Tax Identification/PPSN numbers, passport details, driving licence details, tax residency, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage and telephone voice recordings, online identifiers (i.e. cookies).

The purposes for which we use your personal data:

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

- To open and maintain an account for you.

- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union, the Credit Union Act, 1997 (as amended) and Central Bank Regulations.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligations for example anti-money laundering obligations.
- Administering any applications for services or products you may make and to ensure the provision of that service or product to you.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- In order for the credit union to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to Irish Credit Bureau and the Central Credit Register.
- Administering any loan applications you may make or any loans you may have with us, including where necessary, taking 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.
- 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.

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.

The purposes for which we use your sensitive personal data:

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

- To allow us to underwrite loan applications.
- To allow us to request confirmation of loan protection and life savings protection from ECCU.
- To allow us to process any claims made under the loan protection cover and life savings cover from ECCU.

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 controllers in their own right¹. 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.

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, provisioning and anti-money laundering purposes and compliance with our legal duties in that regard. We also carry out profiling in order to tailor our marketing to you by profiling members according to categories such as age, loan history, savings, life cycle and date of account opening.

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 on www.stfranciscu.ie.

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

- **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.
- **Membership forms** and records will be retained in individual member files for 6 years after the relationship with the member has ended.
- **Loan application information** is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.

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

- Credit agreements and guarantee agreements are **contracts and as such the credit union** retains them for seven years from date of repayment of loan and interest in full, and twelve years where the document is under seal.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one month.
- **Telephone recordings** which are used in the normal course of business (i.e. for verifying information, training and quality of service are retained for 12 months.

Planned data transmission to third countries

There are no plans for a data transmission to third countries

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

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

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 Insurance (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 Irish Credit Bureau and the Central Credit Registrar

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit unions lending policy.

Member Service: We may use information about your account to help us improve our services to you.

Electronic Payments: If you use our electronic payment services to transfer money into or out of your credit union account (such as credit transfers, standing orders and direct debits) or make payments through your debit card into your credit union account, we are required to share your personal data with our electronic payment service provider **BNP Paribus**.

ATM Card and Savings Card: If you have a debit, savings card or prepaid card with us, we will share transaction details with companies which help us to provide these services.

Foreign Exchange: If you use our foreign exchange services, we are required to share some of your personal data with our foreign exchange services provider FEXCO.



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 and the Foreign Accounts Tax Compliance Act. 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 information with certain statutory bodies such as the Department of Finance, the Department of Social Protection, the Financial Services and Pensions Ombudsman Bureau of Ireland and the Data Protection Commission if required by 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 internal auditor and external auditor. We will allow the internal auditor 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, and from 2019 in respect of guarantors. 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 from 2019 details of the guarantor, to the CCR. The credit union is also obliged to verify the identity of borrowers and guarantors before sending information to the Central Credit Register.

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 forward your personal data to our Solicitors Piers & Fitzgibbon Solicitors who will process your personal data and engage with your Solicitors in order to 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 Teams family or a business in which a member of the Board /Management Team has a significant shareholding.



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 Irish Credit Bureau and 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.

ICB are using **Legitimate Interests** (GDPR Article 6 (f)) as the legal basis for processing of your personal and credit information. These Legitimate Interests are promoting greater financial stability by supporting a full and accurate assessment of loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention.

Please review ICB's Fair Processing Notice which is available at [http://www.icb.ie/pdf/Fair Processing Notice.pdf](http://www.icb.ie/pdf/Fair_Processing_Notice.pdf). 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 your contact details, 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 take steps necessary to recover a debt to protect members savings and the assets and equity of the credit union

Judgements Searches: We may carry out searches in Vision-net Ltd. 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.

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

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 resolve any disputes.



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 section on Your Marketing Preferences.

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 18 then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Schools Quiz

This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools Quiz is open to entrants aged 4 to 13. Upon entry parent/legal guardians will be given further information and asked for their consent to the processing of their child's personal data. This information is processed only where consent has been given. Where the person providing consent is below 18 then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms.

Our Cookie Policy

By continuing to use St. Francis Credit Union's website and by not changing your web browser settings to disable cookies, you consent to the use of cookies. The cookies policy should be read in addition to the terms and conditions of this website and is subject to them. If there is any conflict between the cookies policy and the terms and conditions, the terms and conditions shall prevail.

Cookies Are

Cookies are small pieces of information, typically of letters and numbers stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits. 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 information from which you can be identified, unless you have furnished such information to the website.

St. Francis Credit Union uses cookies to collect information about visitors' use of the website, including things like connection speed, operating system details, the time and duration visits and IP addresses. The information collected by cookies enables St. Francis Credit Union to understand the use of its site, including the number of visitors it has, the pages viewed per session, time exposed to particular pages etc. This in turn helps to provide visitors with a better experience. St. Francis Credit Union will not attempt to personally identify visitors from their IP addresses.

Cookies do not in any way compromise the security of your computer. Visitors can use most of the features on this website with no loss of functionality if cookies are disabled from the web browser. However some features, including our online banking system, require cookies to be enabled in order for the service to function properly.

This website uses the types of cookies listed below:

Necessary

These cookies are essential in order to enable you to move around websites and use the websites' features, such as accessing secure websites or secure areas of websites. Without these cookies, services you have asked for, like online banking and mobile banking, cannot be provided.

Functionality

These cookies allow this website to remember choices you make (such as your preferred text size) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. Other examples include cookies that keep track of your progress when filling online application forms.

Performance

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. St. Francis Credit Union uses first-party analytics cookies for this purpose.

Analytical/performance cookies

They are set by third parties, including Google Analytics. Performance cookies allow us to collect statistical information about our visitors, such as whether they have visited the site before and the pages they view. This information is gathered anonymously – it does NOT enable us to identify who you are. We use these cookies to determine the kind of content and services our visitors value most, which in turn helps us improve our website and its content.

Should you wish to prevent websites from using cookies, instructions for changing your web browser settings are outlined below for each of the most popular web browsers. Please note: our online banking service, including mobile banking, require cookies to be enabled in order for the service to function properly. If you disable cookies, you will not be able to use our online and mobile banking services. The cookies policy applies to this website only. If you visit St. Francis Credit Union's presence on social media sites, the cookies policy of that social media site will apply.

Blocking Cookies

Internet Explorer

Go to the 'Tools' menu

Click on 'Internet Options'

Click the 'Security' tab

Highlight the 'Internet' zone (selected by default)

Select security level 'High' for this zone

Click on 'OK'

Google Chrome

Click the Chrome menu button, a button of 3 bold horizontal lines located to the right of the browser toolbar.

Select Settings.

Click Show advanced settings.

In the "Privacy" section, click the Content settings button.

In the "Cookies" section, click "Block Cookies by default"

Mozilla Firefox

Open the Edit menu and choose Preferences.

Under the Privacy & Security category, choose Cookies. (If no subcategories are visible, double-click the category to expand the list.)

Click the following radio button: Disable cookies

Netscape

Go to 'Edit' in the menu bar

Click on 'Preferences'

Click on 'Advanced'

Select the 'Cookies' field

Tick either 'Warn Me Before Accepting a Cookie' or 'Disable Cookies'

Click on 'OK'

Safari

Choose Safari > Preferences, and then click Privacy.

In the "Block cookies" section, specify if and when Safari should accept cookies from websites. To see an explanation of the options, click the Help button (question mark).

If you want to see which websites store cookies on your computer, click Details.

St. Fran

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 and 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 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.*

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

<p>Telephone +353 57 8684800 +353 (0)761 104 800 Lo Call Number 1890 252 231 E-mail info@dataprotection.ie</p>	<p>Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois</p>
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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 information, object to the processing of your personal data, or request that we send you or a third party a copy of your relevant personal data in a reusable format, please contact the 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 straight away if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us at dataprotectionofficer@stfranciscu.ie or on (065) 6828305.

St. Francis Credit Union Limited