

# DATA PROTECTION STATEMENT – ONLINE LOAN APPLICATIONS

---

## 1. Overview

*We want to explain clearly how we process your Personal Data when you apply for and receive a loan from the Credit Union using our online loan application facility.*

In order to provide Credit Union loans, we need to collect Personal Data from our members. This section of the Data Protection Statement provides specific information relating to the processing of online loan applications and subsequent maintenance of loan accounts.

## 2. Members and Their Representatives

Our Members are individuals to whom we provide Credit Union loans.

For the most part we transact directly with members in relation to the operation of the Credit Union loans. On occasion we may transact with relatives, guarantors or representatives who are acting on behalf of a member.

When we transact with someone on behalf of a member, we will also collect limited additional Personal Data about that person, this might include:

- a person who acts as guarantor on a member's loan;
- a spouse or relative who provides information to us to support the loan application;
- a legal representative of a member who communicates with us on the member's behalf.

## 3. Categories of Personal Data

This Data Protection Statement provides information relating to the categories of Personal Data we process.

| <b>When you apply for a Credit Union loan using our online loan facility, we collect the following information.</b> |   |
|---|---|
| <b>Category of Personal Data:</b>   | <b>Description:</b>   |
| <b>Contact Data</b>   | This includes email address, phone number, postal address, billing address.   |
| <b>Financial Data</b>   | This includes financial data such as your account status and history.<br><br>With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, mortgage details, other loans and debts, previous addresses, spouse, partners, and we may request further information to support the purpose for the loan. |
| <b>Correspondence Data</b>  | If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence.  |

| <b>When you apply for a Credit Union loan using our online loan facility, we collect the following information.</b> |   |
|---|---|
| <b>Category of Personal Data:</b>   | <b>Description:</b>   |
| <b>Web Data</b>   | When you apply online, we collect details such as username and password in (order to create an account), information about your interactions with the online loan facility such as your IP Address, time and date of interactions and the progress of your application. |
| <b>Log data</b>   | This includes data about your use of our online loan services, including data about the time and date of your interaction as well as IP address and transaction information.  |
| <b>PPSN</b>   | Your Personal Public Services Number (PPSN) will be collected, in order to meet our reporting requirements to the Central Credit Register.  |
| <b>Health Data</b>  | You will be required to complete a health declaration form for the purpose of loan insurance. The level of information required will depend on factors such as your age, your health situation, and the amount of the loan.   |

#### **4. Processing Activities**

*We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.*

| <b>We have to process Personal Data legally. As a regulated entity much of the data that we process is required to meet with a regulatory obligation or in order to deliver Credit Union loan services to you.</b>                  |   |  |
|---|---|--|
| <b>Purpose of Processing:</b>   | <b>Categories of Personal Data:</b>   | <b>Lawful Basis:</b>   |
| <ul style="list-style-type: none"> <li>To process your application for a loan;</li> </ul>   | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>Web Data</li> </ul>                              | <ul style="list-style-type: none"> <li>Contract</li> </ul>                                       |
| <ul style="list-style-type: none"> <li>To assess your application for a loan;</li> </ul>  | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>PPSN</li> </ul>                                  | <ul style="list-style-type: none"> <li>Legal Obligation</li> <li>Legitimate Interests</li> </ul> |
| <ul style="list-style-type: none"> <li>To provide loan drawdown and to manage the repayment schedule;</li> <li>To provide you with information about the performance of your loan;</li> <li>To provide support services;</li> </ul> | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>Correspondence Data</li> <li>Log Data</li> </ul> | <ul style="list-style-type: none"> <li>Contract</li> </ul>                                       |
| <ul style="list-style-type: none"> <li>To administer the ILCU Loan Protection Scheme;</li> </ul>  | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>Health Data</li> </ul>                           | <ul style="list-style-type: none"> <li>Contract</li> <li>Explicit Consent</li> </ul>             |
| <ul style="list-style-type: none"> <li>To implement credit control measures where there are missed loan repayments;</li> <li>To carry out credit control including collecting and enforcing debts and arrears;</li> </ul>           | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>Log Data</li> </ul>                              | <ul style="list-style-type: none"> <li>Contract</li> </ul>                                       |

|   |  |  |
|---|--|--|
| <ul style="list-style-type: none"> <li>To comply with our legal reporting obligations in respect of the Central Credit Register (CCR);</li> </ul>   | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> <li>PPSN</li> </ul> | <ul style="list-style-type: none"> <li>Legal Obligation</li> </ul> |
| <ul style="list-style-type: none"> <li>To interact with the regulator and the Central Bank of Ireland for reporting, compliance, and auditing purposes;</li> <li>to engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;</li> </ul> | <ul style="list-style-type: none"> <li>Contact Data</li> <li>Financial Data</li> </ul>               | <ul style="list-style-type: none"> <li>Legal Obligation</li> </ul> |

**Automated Decision Making:**

We use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your organisation. When you apply for a loan, we use data from different sources to look at your ability to repay the loan. We also use information provided by you and information from the Central Credit Register. The information we process for automated lending decisions includes income, financial statements, transaction history, salary, spending and bills, credit history, other loans held by you. You can object to a decision based on automated processing. For automated processing to be used, you must consent. If you do not consent, automated processing is not used.

**5. Sources of Personal Data**

We receive information from you when you apply for a loan online.

This information is collected from you directly through the online loan application facility or from you and other people in the case of a joint loan application or where proof of household income is sought.

We receive information from external sources such as CCR when we carry out Credit Checks relating to the Loan application.

We receive information from you during the course of the loan such as:

- information related to loan repayments;
- information you supply when you communicate with us about your loan repayments.

We may receive information about you from a representative when they communicate with us on your behalf.

**6. Retention of Loan Information**

|  |                               |
|--|-------------------------------|
| <b>Our retention policy is as follows:</b>         |                               |
| <b>Purpose</b>                                     | <b>Retention Period</b>       |
| Loan application and approval, loan administration | Termination of loan + 7 years |

Note that this section of the Credit Union Data Protection Statement relates only to how we process data relating to the processing of Credit Union loans.

We have Data Protection Statements that provide specific information about how we process your Personal Data when you interact with any of the following Credit Union Services including:

- Member Accounts
- Loan Accounts
- Website Users
- Online Banking
- Current Account
- Online Loan Applications
- Online Membership Applications

Please see our General Data Protection statement above for more general information about our processing activities including marketing activities and information relating to (i) how to exercise your rights, (ii) who your Personal Data may be shared with (including cross border transfer); (iii) the security measures we have implemented and the contact details for the Data Protection Commission in Ireland.