

DATA PROTECTION STATEMENT – ONLINE MEMBERSHIP APPLICATIONS

1. Overview

We want to explain clearly how we process your Personal Data when you open and operate an account online as a Credit Union Member.

In order to provide our Credit Union services, we need to collect Personal Data relating to our members. This statement provides more detailed information about the processing activities of the Credit Union relating to member accounts. This statement forms part of the general Data Protection Statement of the Credit Union.

Capitalised terms that are defined in the general Data Protection Statement shall have the same meaning when used in this Data Protection Statement for Member Accounts

2. Members and their representatives

Our Members are individuals to whom we provide our Credit Union services, for example operating savings and budget accounts or offering loans or online banking services.

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

When we transact with a representative individual on behalf of a member, we will also collect limited additional Personal Data about that person. These situations may arise as follows:

- a person who is nominated as beneficiary on the account in the event of the members death;
- a person with power of attorney on a member account;
- a parent/guardian who is supervising a juvenile account
- a person who acts as guarantor on a member's loan;
- 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.

When you become a member and when we are operating your account, we collect the following information	
Category of Personal Data	Description
Identification Data	This includes name, marital status, title, date of birth, gender, PPSN, photographs, job title and employer. It also includes background and verification data such as a copy of passports or utility bills as well as other information we require to comply with our obligations under anti-money laundering legislation.
Biometric Data	This includes facial geometry recognition.
Contact Data	This includes email address, phone number, postal address, billing address.
Financial Data	This includes financial data such as your account status and history, transaction data, contract data, details of the Credit Union products being used. 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.

When you become a member and when we are operating your account, we collect the following information	
Category of Personal Data	Description
Correspondence Data	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.
Marketing Data	This includes your preferences in receiving marketing from us and your communication preferences.

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.

<p>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 member services to you.</p> <p>If we look for consent, we will always ensure that Credit Union Members know what they are consenting to.</p>		
Purpose of Processing	Categories of Personal Data	Lawful Basis
Member Application and account set-up and administration	<ul style="list-style-type: none"> • Identification Data • Biometric Data (Online member account application) • Contact Data • Correspondence Data • Financial Data 	Contract
<p>To maintain your account;</p> <p>To enable you to transact on your account;</p> <p>To provide you with information about the operation of your account;</p>	<ul style="list-style-type: none"> • Identification Data • Contact Data • Correspondence Data • Financial Data 	Contract
<p>To administer the ILCU Savings Protection Scheme;</p> <p>To administer insurance products and services offered to Credit Union members such as Life Savings, Loan Protection, Death Benefit Insurance and Disability Cover;</p>	<ul style="list-style-type: none"> • Contact Data • Financial Data 	Contract
<p>To offer you additional services associated with Credit Union membership such as online banking, foreign exchange services and loan facilities.</p> <p>To keep you informed of new Credit Union services that may be of interest to you</p>	<ul style="list-style-type: none"> • Contact Data • Marketing data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent

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 member services to you. If we look for consent, we will always ensure that Credit Union Members know what they are consenting to.

Purpose of Processing	Categories of Personal Data	Lawful Basis
To comply with our legal obligations in respect of the collection of taxes, levies, contributions;	<ul style="list-style-type: none"> • Identification Data • Biometric Data (Online member account application) • Contact Data • Financial Data 	Legal Obligation
<p>To interact with the regulator and the Central Bank of Ireland for reporting, compliance, and auditing purposes;</p> <p>To engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;</p>	<ul style="list-style-type: none"> • Identification Data • Biometric Data (Online member account application) • Contact Data • Correspondence Data • Financial Data 	Legal Obligation
To comply with legal obligations connected with “know your customer” requirements under anti-money laundering laws, or under anti-money counter terrorist financing law	<ul style="list-style-type: none"> • Identification Data • Biometric Data (Online member account application) • Contact Data • Financial Data 	Legal Obligation

5. Sources of Personal Data

We have set out below the sources of personal data we collect.

We receive information about you initially when you join the Credit Union and open an account with us. We will ask you for certain information to be provided during the membership application process.

This information is collected from you directly through the Membership application form or from you.

We receive information from you during the course of your relationship with us such as:

- updates to your account information should any of your account details change
- information related to transactions on your account
- information you supply when you communicate with us about the operation of your account
- information you supply when you take up our services such as applying for loans or activating an online banking facility

We may collect your Personal Data from a 3rd party when we conduct background checks, including “know your customer” checks.

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

6. Retention of member information

We only keep your Personal Data as long as it is necessary for the purposes of processing it or to comply with legal or regulatory requirements.

Our retention policy is as follows	
Purpose	Retention Period
Member Application and account set-up and administration	Account closure + 7 years
Budgeting services such as MABS	Account closure + 7 years
Member insurance Services	Account closure + 7 years
Other member benefits including competitions and member draws	12 months
Marketing and promotion of our business	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe
Administration of our relationship	Account closure + 7 years Correspondence Data

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

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.