

## Nominations - Privacy Notice

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### 1. Overview

We want to explain clearly how we process your Personal Data when you are nominated by a member of our Credit Union.

To provide our Credit Union services, we need to collect Personal Data relating to our members. This privacy notice provides more detailed information about the processing activities of the Credit Union relating to our nominations process.

Capitalised terms that are defined in the general Data Protection Statement shall have the same meaning when used in this privacy notice for Nominations.

### 2. Members and their representatives (Nominated Parties)

- The ability of a member over the age of 16 to nominate individuals to receive property in their Drogheda Credit Union account on their death is a unique facility available for Drogheda Credit Union members under the Credit Union legislation by which we operate. The nominated property does not form part of a deceased person's estate.
- The member may nominate a person(s) of choice to receive their property (i.e., shares) in Drogheda Credit Union presently up to a maximum value of €23,000. Any amount in excess of this balance forms part of the member's estate and must be dealt with in accordance with the law.
- The information relating to you as nominee has been provided to us by the member during their lifetime.
- A member may change the details of their nomination as often as they like during the course of their membership with Drogheda Credit Union. In addition, there may be instances where a nomination is revoked through marriage or civil partnership, or the death of the nominee before the nominating member. There is therefore no guarantee that a nomination will be valid until the member has passed away and the validity of the nomination is confirmed by Drogheda Credit Union. As such, we are unable to contact individuals directly to advise them that we are processing their information.
- Where a member makes a nomination, we are required under the Credit Union legislation by which we operate to keep a record of all persons nominated (along with any revocation or variation of any nomination).
- As this is the first time we have communicated with you in relation to the nomination, we are required under data protection legislation to provide you with the information contained within this privacy notice.

### 3. Categories of Personal Data

This Privacy Notice provides information relating to the categories of Personal Data we process in relation to nominations.

<b>When you are nominated by a member of our credit union, we will process the following data;</b>	
<b>Category of Personal Data</b>	<b>Description</b>
<b>Identification Data</b>	This includes your name, address, relationship to member, phone number, identity and address verification (ID&V), bank details (to allow payment/transfer of nominated property.)
<b>Contact Data</b>	This includes email address, phone number, postal address.
<b>Financial Data</b>	This includes financial data such as bank details (to allow payment/transfer of nominated property.)
<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.

#### 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.

We need the categories of information in the list above to allow us to record your details in our register of nominations, identify you, to contact you and then upon order upon the passing of the member, to process the nomination (subject to a valid nomination) and transfer any nominated property to you, the nominee(s).

The lawful basis upon which we rely for processing the above information is Legal Obligation and Contract.

We may also need to share some of the above categories of personal information with other parties, such as the Irish League of Credit Unions (ILCU)<sup>1</sup> and our professional advisers such as solicitors or auditors. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or other third parties (such as persons administering the deceased estate) as required to comply with the law.

We do not process any of your personal data outside the European Economic Area (EEA) and we make it a condition of our processors who work for us under contract that they must process your data on our behalf within the EEA also. Data may be transferred from us to the UK which is a third country. The data is transferred based on an adequacy regulation by the EU in respect of the UK.

#### 5. Sources of Personal Data

When a member makes a nomination, they provide us with the above information about you as the nominee(s). Where a member makes a nomination, we are required under the Credit Union legislation by which we operate to keep a record of all persons nominated (along with any revocation or variation of any nomination).

<sup>1</sup> The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring services to affiliated credit unions. We may disclose information in the nomination form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

## 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.

We will retain permanently, your name in our register of nominations. Member nomination forms (and any other documentation related to the nomination will be retained for a period of six years to reflect the period provided for in the Statute of Limitations (plus one additional year to allow for delays) after the relationship with the member has ended (e.g. the member passing away).

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Note that this privacy notice relates only to how we process data relating to member accounts.








We have privacy notices 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
- Online Banking
- Current Accounts
- Nominations
- Mortgages
- Guarantors
- Recruitment
- Cookies
- Juvenile
- Website Users

Please see our Data Protection statement 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.

## Your Rights

Irish legislation and the EU's General Data Protection Regulation gives individuals significant rights over how their personal data is collected and used. A summary of these rights is set out below. Further information can be found on the website of the Data Protection Commissioner ([www.dataprotection.ie](http://www.dataprotection.ie)).

	<ul style="list-style-type: none"> <li>• <b>To find out</b> whether we hold any of your personal data, <b>if we do, to request access</b> to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Request correction</b> of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified and kept as up to date and as accurate as possible.</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Request erasure</b> of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Object to processing</b> of your personal information 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 information for direct marketing purposes.</li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Request the restriction of processing</b> of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.</li> </ul>
	<ul style="list-style-type: none"> <li>• Where we are processing your data based solely on your consent <b>you have a right to withdraw that consent at any time and free of charge.</b></li> </ul>
	<ul style="list-style-type: none"> <li>• <b>Request that we:</b> 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. <i>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.</i></li> </ul>

If you have any questions or queries, please feel free to contact the Data Protection Officer in Drogheda Credit Union who is there to help answer your questions and make sure your data is processed carefully and correctly.

You always have the right to seek advice and support from the **Data Protection Commissioner (DPC)** and make a complaint where you believe we have breached your rights in the processing of your data.

Telephone: 01 7650100 / 1800437 737  
Web Form: <https://forms.dataprotection.ie/contact>

Postal Address: Data Protection Commissioner  
21 Fitzwilliam Square South, Dublin 2, D02 RD28  
Ireland

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

You are free to submit a Subject Access Request to Drogheda Credit Union free of charge and within 30 days the Data Protection Officer will provide you with copies of your personal data which Drogheda Credit Union process and supporting information such as the source of your data, retention periods and who your data has been share with, if anyone. There is no charge and such a request.

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 your relevant personal data in a reusable format please contact our 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 straightaway if there are any changes to your personal information, if you wish to make changes to any of your personal information please contact us on [info@droghedacu.ie](mailto:info@droghedacu.ie)