

# **CURRENT ACCOUNTS - PRIVACY NOTICE**

### 1. Overview

We want to explain clearly how we process your Personal Data when you apply for and use our current account facilities as a Credit Union Member.

To provide our online banking services, we need to collect Personal Data in order to set-up and manage your current account. This data privacy notice provides specific information relating to your current account.

Note: You must be an existing Credit Union member to apply for current account. To see how we process your data in relation to your Credit Union Membership please see our Member Account Privacy Notice and our Data Protection Statement.

# 2. Categories of Personal Data

We process personal data as a result of your interaction with our current account services.

When you register for and use our current account facilities, we process the following categories of personal data.		
Category of Personal	Description	
Data		
Identification Data	This includes name, marital status, title, data of birth, address, gender. It includes verification data required to identify you as the holder of the account.	
Registration data	This includes identification data (member account details and PPS number), contact data (proof of address), Financial Data	
Transaction Data	This includes data about your use of the current account services, including data about the date, time, and details of your transactions	
Financial Data	This includes financial data such as your account status and transaction data.	
Correspondence Data	This includes details of correspondence relating to your use of the current account services including support requests	
Biometric Data	This includes facial recognition technology	



# 3. 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 have to process Personal Data legally. We collect data when you interact with our current account services in order to provide a secure service and to administer the service			
Purpose of Processing	Categories of Personal Data	Lawful Basis	
To register you for current account services	<ul> <li>Registration data</li> <li>Financial Data</li> <li>Correspondence Data</li> </ul>	Contract	
To administer the current account services	<ul> <li>Identification Data</li> <li>Transaction Data</li> <li>Financial Data</li> <li>Correspondence Data</li> </ul>	Contract	
To support your current account and answer queries	<ul> <li>Identification Data</li> <li>Correspondence data</li> <li>Transaction Data</li> <li>Financial Data</li> </ul>	Contract	
To administer the provision of debit cards to current account holders	<ul><li>Identification Data</li><li>Financial Data</li></ul>	Contract	

# 4. Sources of Personal Data

We receive information from you when you register for current account services and whenever you interact with those services.

This information is collected from you directly as a result of your use of the Current Account service.

### 5. Retention

We will only retain Personal Data for as long as it is needed for the purpose for which it was collected. After that it is deleted from our systems.

Generally, Personal Data collected specifically for delivery of current account services is kept until account closure plus a period of 7 years.

Note that this privacy notice relates only to how we process data relating to the Credit Union Current Account services.

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
- Website Users
- Online Banking
- Current Account
- Nominations
- Mortgages
- Guarantors
- Recruitment
- Cookies
- Juvenile Accounts

If we issue you a debit card, 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 at <u>https://currentaccount.ie/files/tpl-privacy-policy.pdf</u>

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).

	• <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.
$\checkmark$	• <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.
×	• <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).
	• <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.
APPLY	• <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.
Withdraw	• 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.

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: <u>https://forms.dataprotection.ie/contact</u> 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 <u>info@droghedacu.ie</u>