



DATA PROTECTION STATEMENT

Effective Date: 01.05.2024

We are **Drogheda Credit Union**.

You can find us at:

Credit Union:	Drogheda Credit Union	
Address:	<u>Drogheda Office:</u>	Clarke House, Laurence Street, Drogheda, Co. Louth
	<u>Drogheda Loans Office:</u>	Laurence Street Shopping Centre, Drogheda, Co. Louth
	<u>Trim Office:</u>	Market Street, Trim, Co. Meath
	<u>East Meath Office:</u>	Town Centre, Bettystown, Co. Meath
	<u>Dunleer Office:</u>	Ardee Road, Battsland, Dunleer, Co Louth
Website:	https://www.droghedacu.ie/	
Email:	info@droghedacu.ie	
Phone:	041 9838496	

“**Personal Data**” means data which identifies a person or could identify a person, such as their name, contact details and financial data. It applies to Personal Data that we process in connection with your relationship with us as a member, supplier, partner, investor, visitor to our website or prospective employee.

Every individual has a right to understand how their Personal Data is being used and to exercise control over it using rights which are set out in law under the General Data Protection Regulation (“**GDPR**”).

As a member-owned and cooperative institution Drogheda Credit Union **strives to** provide a safe place for our members to save and borrow at reasonable rates. We extend our ethos to protecting your personal information. We make the following commitments:

We will:

- process your personal information in a lawful, fair, and transparent manner.
- not send you marketing emails if you do not want to receive them.
- always ensure that we only share your Personal Data with third parties where necessary and only after thorough third-party due diligence.
- ensure appropriate technical and organisational measures are in place to protect your Personal Data and keep it secure.

Our Data Protection Statement seeks to ensure that you know:

- what Personal Data we collect from you
- what we are doing with your Personal Data
- that we will only use your Personal Data for the purposes set out in our Data Protection Statement
- your rights, and how to exercise control over your Personal Data

If you have any questions, please get in touch with us at dataprotection@droghedacu.ie

Data Protection Officer,
Drogheda Credit Union,
Clarke House,
Drogheda,
Co. Louth

You always have the right to lodge a complaint with a supervisory authority, in particular in the country where you reside, place of work or place of the alleged infringement if you consider that the processing of Personal Data infringes the GDPR.

The contact details for the Data Protection Commission (DPC) in Ireland are:

Online Form: <https://forms.dataprotection.ie/contact>

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Tel: 01 7650100 or 1800 437 737



In this Data Protection Statement, you will find the following information laid out in sections to make it easier to find the information you want.

1. ABOUT DROGHEDA CREDIT UNION
2. THE PURPOSE AND STRUCTURE OF OUR DATA PROTECTION STATEMENT
3. WHO OUR DATA PROTECTION STATEMENT APPLIES TO
4. CATEGORIES OF PERSONAL DATA
5. OUR LEGAL BASIS
6. OUR PROCESSING ACTIVITIES
7. SOURCES OF PERSONAL DATA
8. DISCLOSURE OF PERSONAL DATA
9. SECURITY MEASURES
10. TRANSFERS OUTSIDE THE EEA
11. RETENTION
12. YOUR RIGHTS UNDER THE GDPR
13. COOKIES
14. AMENDMENTS TO THIS DATA PROTECTION NOTICE
15. OUR CONTACT INFORMATION
16. SUPERVISORY AUTHORITY



1. ABOUT DROGHEDA CREDIT UNION

Drogheda Credit Union Ltd. is a co-operative based financial institution, owned by our members who save and borrow with us. Our operating principles are founded on our core values of cooperation, equality, and mutual self-help.

The geographic area in which we operate is called our 'Common Bond' which includes Drogheda, Trim, East Meath and Dunleer. The thing which makes us different is the close relationship we enjoy with the community in which we're based.

We provide a safe place for members' savings (shares) and deposits and offer a full suite of loans as well as providing services such as online banking, current account, insurance, and funds transfer services that enable our members to transact on their savings(share), deposit, loan, and current accounts.

To provide our services, we need to process Personal Data. We are committed to protecting the rights and data of individuals in accordance with data protection legislation including the General Data Protection Regulation in Europe (the "GDPR").

2. THE PURPOSE AND STRUCTURE OF OUR DATA PROTECTION STATEMENT

Our Data Protection Statement is designed to give you a general understanding of what Personal Data we process, why we process it and how long we retain it for.

For more detailed information, please see our respective privacy notices as listed below.

- Member Accounts Privacy Notice
- Loan Accounts Privacy Notice
- Online Banking Privacy Notice
- Current Accounts Privacy Notice
- Nominations Privacy Notice
- Mortgages Privacy Notice
- Guarantors Privacy Notice
- Recruitment Privacy Notice
- Cookies Privacy Notice
- Juvenile Privacy Notice
- Website Users Privacy Notice

The purposes for which we use your Personal Data:

Drogheda Credit Union will use your Personal Data to assist in carrying out the following:

- To open and maintain an account for you.
- To meet our obligations under the Credit Union's Standard Rules.
- 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 and beneficial ownership reporting obligations.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- To purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.
- We may use credit scoring techniques 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.

We need the 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.

Change of purpose:

You can be assured that we will only use your data for the purpose it was provided at the time we collected it from you and only in ways compatible with the purpose stated at the time of collecting. If we need to use your personal information for an unrelated purpose, we will request your consent for the new purpose or explain the legal obligation that requires the further processing of your data. At all times Drogheda Credit Union will operate under full transparency with and for its members.

Profiling:

We sometimes use systems to make informed decisions based on personal information we have (or are allowed to collect from others) about you such as your credit score. This information is used as part of the decision making, we carry out for services such as loans and to meet our obligations regarding anti-money laundering and comply with our legal duties under the many regulations that govern our activities. We aim to process the minimum amount of Personal Data possible in accordance with Data Protection principles.

3. WHO OUR DATA PROTECTION STATEMENT APPLIES TO

This Data Protection Statement provides specific information relating to the following data subjects whose Personal Data we process:

1. Credit Union members;
2. individuals who may become members of the Credit Union;
3. individuals who are party to or connected with any of the services we offer our members such as beneficiaries, guarantors, relations, or representatives of one of our members;
4. business contact details including those of our suppliers and partners;
5. members of the public and non-members who pass by and/or visit the Credit Union and whose images are captured on CCTV;
6. users/visitors of our website; and
7. prospective employees of the Credit Union.

4. CATEGORIES OF PERSONAL DATA

We may collect, store, and use the following categories of Personal Data about you:

Identification Data

This includes name, marital status, title, data of birth, gender, PPSN, photographs, job title and employer. It also includes background and verification data such as a copy of passports, driver's license, 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.

Registration Data

This includes username and password as well as mobile phone number and security questions which are used to create and manage user accounts for secure access to our online services.

Member Financial Data

This includes financial data such as your account status and history, transaction data, contract data, credit checks, details of the Credit Union products being used. This also includes payment related information or bank account details and financial data received as part of the services that we offer. 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.

Operational Data

This includes identification documents, records of interactions with Drogheda Credit Union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage and telephone voice recordings.

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 correspondence preferences.

CCTV Data

We operate CCTV cameras at the Credit Union. If you pass by and/or visit any of the Credit Union premises, your image may be recorded on CCTV.

Recruitment Data

If we interact with you for the purposes of any job with the Credit Union, we will collect recruitment related data such as identification data, CV data and application data as part of the recruitment process.

When processing CV data, we may process certain Personal Data including the following: date of birth, employment history, skills/ experience, languages, educational history, qualifications, membership of professional associations, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations. As part of processing Recruitment Data, we process interview/screening answers. We are required by the Central Bank of Ireland to carry out criminal record checks for those carrying out certain functions. Please see our Recruitment Privacy Notice for more information in relation to data processed during our recruitment process.

Web Data

When you interact with us online, we will automatically collect data about your use of our services, including data on the type of device you are using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency, and pattern of Website use. Where possible, this information is collected at an aggregate level and your identity data is not stored as part of this technical data. Web Data includes cookies and web beacons. Further information about how we use cookies is included in our Cookies Privacy Notice.

Log Data

Log data includes logfiles of online interactions with our services such as online banking, online loan, and member application forms. Log data is collected primarily to manage the security of our services and to enable us to investigate incidents and user reported issues.

Social Media Data

Social media data is collected when you interact with our social media channels through shares, likes, comments, mentions, follows, impressions or clicks on content.

Special Categories of Personal Data

When we provide our services, we may process special categories of Personal Data. Under the GDPR, special category Personal Data includes Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The special category Personal Data that may be processed by the Credit Union include the following:

Health Data

When you are taking out a loan the Credit Union may ask you to make a health declaration to obtain insurance cover for the loan. While loan Insurance is free to members, it is a requirement of our loan terms that our members take out insurance on unsecured loans. We process this information with your explicit consent.

Other Special Category Data

Special categories of data relating to political opinions, religious or philosophical beliefs, or trade union membership, or data concerning a natural person's sex life or sexual orientation may be inferred from information you provide such as when you make payments to a religious or political organisation. Such information is incidental to the purposes of processing, and we do not further process this information for any other purpose.

From time-to-time members may provide special category data to us to support a loan application. For instance, members may be applying for a loan to finance a medical procedure and may furnish information relating to the procedure. While we may ask generally for information to support a loan application, we never ask for medical information or other special category data in these circumstances. It is our policy if it is provided to us to return such information to the member.

We need all the categories of information in the list above to allow us to carry out the functions that would be expected of Drogheda Credit Union which include identifying you, contacting you, offering you services under contract and keeping your assets safe.

We also need your personal identification data to enable us to comply with legal obligations such as those set out under the Credit Union Act 1997 and the Central Bank Regulations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We will only process your data when we have legal grounds for doing so.

In certain circumstances during our recruitment process we are required by the Central Bank of Ireland to carry out criminal record checks for those carrying out certain functions. Please see our Recruitment Privacy Notice for more information.

How we use your sensitive personal information:

Special categories of particularly sensitive personal information require higher levels of protection given the risk to you if there is a data breach. In addition to the legal basis for processing as is the case for all Personal Data, we need to have further justification for collecting, storing, and using this type of sensitive personal information. We may process such data only 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.

5. OUR LEGAL BASIS

We have set out here the legal basis we use to process Personal Data. All processing of Personal Data must be lawful. Processing will only be lawful if we have a legal basis for processing.

Contract

We will process Personal Data where necessary to perform our obligations relating to or in accordance with the terms and conditions of any contract you enter with Drogheda Credit Union (such as the membership agreement or loan agreement) or to take steps at your request prior to entering into such agreement.

Legal Obligation

We will need to process certain Personal Data to comply with any legal or regulatory obligations imposed on us, such as to comply with legal obligations connected with "know your customer" requirements under anti-money laundering (AML) laws, or under anti-money counter terrorist financing law.

Consent

For certain processing activities we may rely on your consent. For example, a member may give us consent to receive our newsletter or marketing materials.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so.

You can withdraw consent provided by you at any time by unsubscribing to marketing communications or by contacting us at dataprotection@droghedacu.ie

Legitimate Interest

At times we will need to process your Personal Data to pursue our legitimate business interests, for example for administrative purposes, to collect debts owing to us, to make legal claims, to provide information to



you, to operate, evaluate, maintain, develop, and improve our websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests and rights outweighs our legitimate interests.

If do not want us to process your Personal Data based on our legitimate interests, please contact us at dataprotection@droghedacu.ie and we will review our processing activities.

6. OUR PROCESSING ACTIVITIES

We use Personal Data to provide you with our services and to assist us in the operation of the Credit Union. Under data protection law, we must ensure that the purpose of processing is clear. The data processing takes places under at least one lawful basis; Legal Obligation, Contract, Legitimate Interests, Consent.

Examples of these processing activities include, but are not limited to:

Contract

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 applications, processing applications you make and to maintaining and administer any accounts you have with Drogheda Credit Union.

Security

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 under contract external third parties to process your data on our behalf. An example would be the printers of our AGM booklets and statement or the company that shred our paper files. We will ensure that any information passed to third parties conducting such functions on our behalf will do so with respect for the security of your data and will be protected in line with data protection law. We also have the right to audit them to check they meet these requirements.

Guarantors

As part of your loan conditions, we may make the requirement for the appointment of a guarantor, a condition of your loan agreement, to ensure 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 debt. 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 Drogheda Credit Union is affiliated to the ILCU, Drogheda Credit Union must also operate in line with the ILCU Standard Rules (which members of Drogheda Credit Union are bound to Drogheda Credit Union by) and the League Rules (which Drogheda Credit Union is bound to the ILCU by). We may share 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.

Member Service

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

Home Loans

When assessing your application for a mortgage loan Drogheda Credit Union may use the Personal Data which it obtains about you and the secured property, for the purposes of servicing the mortgage and the secured property, credit checks which may involve group reporting and management purposes, any transfers or other dealings with the secured property, the mortgage, and the mortgage conditions.

Drogheda Credit Union may share the Personal Data it obtains when assessing your application for a mortgage loan for the said purposes and for the following:

- any (or any proposed) assignee, transferee, mortgagee, chargee, sub-mortgagee, sub-charge, trustee or other grantee or dispose or successor and their respective officers, employees, agents and advisers.
- any other person directly or indirectly participating in or promoting or underwriting or managing or auditing (or proposing to do so) any transfer, assignment disposal, mortgage, charge, sub-mortgage, sub-charge, trust securitization scheme, mortgage-backed promissory note facility or other transaction or arrangement relating to or involving the mortgage and the conditions attached to the mortgage.
- agents and advisers of Drogheda Credit Union and any other party to whom you have agreed, Drogheda Credit Union may disclose your Personal Data, each of whom in turn may use that Personal Data for the above and other purposes which have been disclosed to you.

You agree to notify Drogheda Credit Union without delay in the event of any change in your personal circumstances, to enable Drogheda Credit Union to comply with its obligations to keep Personal Data up to date.

Debit Card



If we issue you a debit card, Transact Payments 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 <https://www.transactpaymentsltd.com/privacy-policy/>.

Legal Obligations

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 Drogheda Credit Union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We cannot be responsible for any loss incurred by you or any third party as a result of complying with our legal obligations.

Under the “Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008” Drogheda Credit Union is obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.

Regulatory & Statutory Requirements

To meet our duties to the Regulator and the Central Bank of Ireland and to prove we are looking after your assets properly, we must allow authorised people or officers from these organisations to see our records (which may include information about you) for reporting, compliance, and auditing purposes. For the same reason, we will also hold information about you when you are no longer a member but only for a set period of time as set out in the retention periods. We may also share information with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland ONLY if required by law to do so.

If An Garda Síochána requests a copy of CCTV footage in the investigation of a crime, we only supply this upon receipt of a written instruction signed by a Garda of Superintendent rank or higher.

Purpose of 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 & combatting terrorist financing obligations.

The information provided by you is 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”), in other words, we need to make sure our services and your account(s) are not used for illegal purposes.

Audit

To meet our legislative and regulatory duties we hire under contract an external group of experts to audit our financial accounts, advise on how we can best meet our obligations and improve our ways of operating. We will allow the external auditors to see our records (which may include information about you) for these purposes and they are bound by confidentiality.

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, Drogheda 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 person 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. 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 Assessment

When assessing your application for a loan, Drogheda Credit Union will take several factors into account and will utilise Personal Data sourced from:

- your application form or as part of your loan supporting documentation.
- your existing Drogheda Credit Union file,
- credit referencing agencies such as the Central Credit Registrar

Drogheda Credit Union’s Loans Officer and the Loan’s Committee then utilises this information to assess your loan application in line with the applicable legislation and Drogheda Credit Union’s lending policy. We do this to ensure you have the capability to repay the loan and that we do not lend recklessly.

When assessing your application for a loan, as well as the information referred to above in credit assessment, Drogheda Credit Union also utilises credit data from the Central Credit Registrar, we will use your credit scoring information 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.



Credit Reporting

Where a loan is applied for in the sum of €2,000 or more, Drogheda Credit Union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted in the sum of €500 or more, Drogheda Credit Union is obliged to report both personal details and credit details of the borrower to the CCR. All banks and Credit Unions must do this.

Mortgage Home Loan

Where you obtain a mortgage home loan from us, it will be necessary for Drogheda Credit Union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your Personal Data to register this charge or 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 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

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 details of the loan application in order that they contact you and details of the indebtedness in order that they recover the outstanding sums. Drogheda Credit Union, where appropriate, will take steps to recover a debt to protect the assets and equity of Drogheda Credit Union.

CCTV

We have a CCTV system installed to collect footage inside and outside of all our branches. You can see our clearly marked signage which sets out the purposes for the system. We use these for Security, Health and Safety, Dispute Transaction Resolutions and the Identification and Prevention of Fraud. These cameras are used given the fact that we handle cash on the premises, our ICT systems handle personal and confidential information, and we have an obligation to protect the wellbeing of our staff and visitors to the premises. The footage is only held for 28 days unless there is a need to investigate or deal with incidents that have been brought to the attention of management. Access to the CCTV images is carefully restricted within Drogheda Credit Union and only used for the stated purposes. Regarding the nature of our business, it is necessary to secure the premises, property herein and any staff/volunteers/members or visitors to Drogheda Credit Union and to prevent and detect fraud.

Photographs



Our computer system for managing members' accounts provides us with the ability to store a photo of you. When you are in Drogheda Credit Union at the counter, when your member number is entered it displays this photo to teller. We use this to help keep your information and money safe helping us prevent fraud and giving out information to the wrong person by mistake. Our legitimate interest here is to ensure the safety and protection of your account, and to safeguard against any potentially fraudulent activity. Photographs will allow Drogheda Credit Union to prevent and detect fraud.

Voice Recording

We record phone conversations both incoming and outgoing for the purpose of verifying information and the monitoring / improving of the quality of the services we provide to our members. We do not record all contents of such calls, Debit Card details for example. The purpose of these audio recordings is 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 resolves any disputes.

Credit Union Updates

As the Union is owned by the members it is important to ensure that they are kept up to date with the products and/or services which are on offer. These may be communicated to the membership via post with the notice of the AGM or personal statements. Drogheda Credit Union must provide updates to their members as it is owned by its members, so certain updates and communications must be made.

Consent

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.

Automated Decision Making (Lending)

We use systems to make automated decisions based on personal information we 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.

Competitions

Drogheda 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 which may include your photograph. Your information is processed only where you have given this consent. Where the person providing consent is below 16* then we ask that the parent/legal guardian provides the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Schools Quiz

Drogheda 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 which may include a photograph. This information is processed only where consent has been given. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms.

Draws

Drogheda Credit Union operate monthly / quarterly draws for members. There is an application form requesting consent for the entry fee of €1 per week (€52 per year) which will be deducted from the participating member's share balance. If a member is fortunate enough to win a major prize Drogheda Credit Union may request the member to participate in marketing to announce the winner and promote the draw. This is completely optional but would also be based on written consent.

Marketing

Drogheda Credit Union may wish to undertake direct marketing from time to time to inform members of services, products and special offers. This is only undertaken based on freely given consent which can be withdrawn at any time. When gathering your consent we will ask you to clearly indicate which, if any, means you would like us to communicate with you such as email, SMS, phone or post. If there should be any doubt whether consent has been given or is up to date, Drogheda Credit Union will assume no consent has been given. You can update your marketing preferences whenever you wish either on the website, in Drogheda Credit Union itself or by email. If we make a mistake and send you marketing when you have indicated you don't want it, do let us know as soon as possible.

7. SOURCES OF PERSONAL DATA

We have set out below the sources of Personal Data we collect. We may obtain Personal Data from you directly or from a third party.

Credit Unions Members and their representatives.

We may collect your Personal data directly from you when you:

- make an enquiry or apply for membership of the Credit Union;
- apply for a loan or act as guarantor on a loan;

- transact with us either in the Credit Union or via online banking;
- avail of any of our member services such as our bill payment or foreign exchange services;
- interact with us on behalf of a Credit Union member;
- participate in our member draws, competitions, or other promotional events;
- pass-by or enter the Credit Union premises where CCTV is located;
- apply for a job or enquire about volunteering with us;
- enter a competition run by the Credit Union;
- market or provide your services to us;
- follow us on social media;
- when you visit our website or submit an inquiry via an online form.

Third Parties

we may collect your Personal Data from a 3rd party when we:

- conduct background checks, including “know your customer” checks;
- consult credit referencing agencies such as the Central Credit Register;
- are recruiting and you have provided your Personal Data to a recruitment agency for the purpose of sharing it with us.

Beneficiaries

In some cases, we are provided your Personal Data when a member nominates you as a beneficiary on their account.

What happens if you do not wish to provide this information?

If you are unwilling or unable to provide certain information when Drogheda Credit union makes a request, please understand that we may not be able to offer you the services we provide or perform the contract we have entered. We cannot act in a way that would prevent us from complying with our legal obligations.

8. DISCLOSURE OF PERSONAL DATA

We have set out below the parties to which we may disclose your Personal Data.

In certain circumstances, we may disclose Personal Data to third parties as follows:

- business partners and sub-contractors including, payment processors, data aggregators and hosting service providers;
- authorised officers or employees of the Irish League of Credit Unions (“**ILCU**”) for the purpose of the ILCU providing professional and business support services to the Credit Union and for the administration of the ILCU Savings Protection Scheme;
- ECCU Assurance DAC (“**ECCU**”) for the administration of insurance products and services offered to Credit Union members such as Life Savings, Loan Protection, Death Benefit Insurance and Disability Cover;
- domestic and foreign tax authorities to establish your liability to tax in any jurisdiction;

- the regulator and the Central Bank of Ireland for reporting, compliance, and auditing purposes;
- internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;
- our insurers and/or professional advisers as far as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice, and managing legal disputes;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website. This consists of aggregated anonymous information only and relates to the web pages visited on the Website and not the information included on those web pages;
- if our Credit Union is merged with another Credit Union or acquired by a third party, in which case Personal Data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply the terms of any agreement;
- to protect our rights, property, or safety, or that of you or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- as required by law, in order to meet the requirements of relevant legislation such as the Credit Union Act 1997. We will disclose your Personal Data, if necessary, to:
 - comply with a legal obligation;
 - protect or defend our rights, interests, or property or that of a third party;
 - prevent or investigate possible wrongdoing in connection with our services;
 - act in urgent circumstances to protect the personal safety of one or more individuals; and
 - to protect against legal liability.

When we engage another organisation to perform services for us, we may provide them with information including Personal Data, in connection with their performance of those functions. We do not allow third parties to use Personal Data except for the purpose of providing these services.

9. SECURITY MEASURES

We have put in place appropriate physical, technical and organisational procedures to safeguard and secure the Personal Data we process. These measures include:

- Physical security on the building including but not restricted to time locks, electronic door locks, CCTV, and alarms.
- Technology controls including but not restricted to encryption, access controls, intrusion detection, anti-virus, application of patches and updates and the services of specialist IT professionals.
- Management controls and procedures that limit access to information based on roles, regular staff training, auditing, and risk management protocols.
- Planning for scenarios through Business Continuity Plans which are tested in conjunction with Disaster Recovery Plans for our technology.



We take advice on the best technology to use when looking for new systems or updating existing systems. We also require the same level of caution and preparedness from any service providers chosen by Drogheda Credit Union who then process your data under contract for the us.

We will also take reasonable steps to verify your identity before granting access to information to protect and secure the Personal Data we process.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We also use secure connections to protect Personal Data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

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 data controllers.

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

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.

10. TRANSFERS OUTSIDE THE EEA

We will only transfer Personal Data outside the EEA if necessary and with appropriate safeguards in place.

We do not process any of your Financial Data outside the European Economic Area (EEA) however data may be transferred by us to the UK which is a third country. The data is transferred on the basis of an adequacy regulation by the EU in respect of the UK.

The Credit Union may transfer limited Personal Data to be processed outside the EEA by our processors. In such cases we use processors who provide sufficient guarantees to ensure the security and protection of your Personal Data.

11. RETENTION

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

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate business interests.

We document the reasons for our retention periods and where possible the retention periods themselves in our internal Retention Policy.

We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims. Once the retention period has expired, your Personal Data will be securely and permanently deleted whether we have stored in digitally or in paper format.

12. YOUR RIGHTS UNDER THE GDPR

You have rights under data protection law in relation to how the Credit Union uses your Personal Data. You may generally access your rights free of charge.

You can ask for access to the Personal Data we hold on you

You have the right to ask for all the Personal Data we have about you. When we receive a request from you in writing, we must give you access to all Personal Data we've recorded about you as well as details of the processing, the categories of Personal Data concerned and the recipients of the Personal Data.

We will provide the first copy of your Personal Data free of charge, but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your Personal Data in some limited cases including where this might adversely affect the rights and freedoms of others.

You can ask to change Personal Data you think is inaccurate

You should let us know if you disagree with something included in your Personal Data.

We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete Personal Data (right to be forgotten)

In some circumstances you can ask for your Personal Data to be deleted, for example, where:

- your Personal Data is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your Personal Data (where there is no other lawful basis for us to use it)
- there is no lawful basis for the use of your Personal Data
- deleting the Personal Data is a legal requirement

Where your Personal Data has been shared with others, we will do what we can to make sure those using your Personal Data comply with your request for erasure.

Please note that we cannot delete your Personal Data where:

- we are required to have it by law
- it is used for freedom of expression
- it is used for public health purposes
- it is used for scientific or historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

[You can ask us to limit what we use your Personal Data for](#)

You have the right to ask us to restrict what we use your Personal Data for where:

- you have identified inaccurate information, and have told us of it
- where we have no legal reason to use that Personal Data, but you want us to restrict what we use it for rather than erase it altogether

When Personal Data is restricted, it can't be used other than to securely store the Personal Data and with your consent to handle legal claims and protect others, or where it's for important public interests.

[You can ask to have your Personal Data moved to another provider \(data portability\)](#)

You have the right to ask for your Personal Data to be given back to you or for it to be provided to another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your Personal Data with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

[You can make a complaint.](#)

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

13. COOKIES

We use cookies which are text files that contain small pieces of information which are downloaded to your device when you visit Drogheda Credit Union website. There are several types of cookies:

They are sometimes necessary for the correct operation of our web site as you move between the different pages.

1) **Transient (or per-session) cookies**

These only exist for the duration of your visit to a web site and are deleted when you leave.

2) **Persistent (or permanent) cookies**

These cookies stay on your device until they expire after a pre-set length of time or are deleted. These cookies can be useful because such as when they store your login information so that you don't have to enter your login information every time.

3) **First and third party cookies**

Additionally, cookies can be first or third party cookies. First party cookies are owned and created by the website you're viewing- in this case by Drogheda Credit Union. Third party cookies are owned and created by an independent company, usually a company providing a service – such as Google Analytics.

What cookies do we use?

We use all these types of cookies for the correct operation of this web site as well as to understand how this web site is used by members so that we can continue to improve it. A detailed list of all the cookies used and their type / function is listed on our website.

We do also use **Google Analytics** which is a free web analytics tool that mainly helps site owners to understand how their visitors engage with their site by setting cookies. They collect information anonymously and report site trends without identifying individual visitors, and we have taken steps to ensure that as little as possible Personal Data is collected. It helps us, for example, to understand which areas of our website are the most popular. Google accesses such personal information as IP address, username and associated email address if used to login into the website. We do not process this information for purposes other than to track the performance of our website, this information is not shared with any other third party.

You can refuse or accept cookies from the web site at any time by modifying settings in your Internet browser. Information about the steps to follow can be found on your Internet browser provider's site via your help screen.

Please be aware that if all cookies are disabled, some of the features of Drogheda Credit Union's website may not operate as intended. To opt out of being tracked by Google Analytics please visit <http://tools.google.com/dlpage/gaoptout>.

Please see our separate cookie privacy notice available on our website for further information.

14. AMENDMENTS TO THIS DATA PROTECTION NOTICE

Any amendments to our Data Protection Statement will be updated on our website and when doing so we will change the effective date at the top of this Data Protection Statement. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services. If you are not happy with any changes that we have made, please contact us.

In some cases, we may provide you with additional notice of changes to this Data Protection Statement, such as accompanying the annual member booklet. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

15. OUR CONTACT INFORMATION

Please contact us if you have any questions about this Data Protection Statement or Personal Data we hold about you, you can contact us by email at: dataprotection@droghedacu.ie or write to us at:

Data Protection Officer,
Clarke House
Laurence Street
Drogheda
Co. Louth

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 shared 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 always meet your expectations. Please help us by telling us straightaway if there are any changes to your personal information by contacting info@droghedacu.ie.



16.SUPERVISORY AUTHORITY

The Data Protection Commission in Ireland may be contacted using the contact details below if you have any concerns or questions about the processing of your Personal Data.

CONTACT DETAILS

Online Form: <https://forms.dataprotection.ie/contact>

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Tel: 01 7650100 or 1800 437 737