

Loan Accounts – Privacy Notice

1. Overview

We want to explain clearly how we process your Personal Data when you apply for and/or receive a loan from the Credit Union.

To provide Credit Union loans, we need to collect Personal Data from our members. This privacy notice provides specific information relating to loan applications and maintenance of loan accounts.

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

2. Members and their representatives

For the purpose of this privacy notice, 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:

- 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 Privacy Notice provides information relating to the categories of Personal Data we process on Loan Accounts.

When you apply for a Credit Union loan, and during the course of your loan we collect the following information	
Category of Personal Data	Description
Contact Data	This includes email address, phone number, postal address, billing address.
Identification Data	This includes name, date of birth, signatures, identification documents, passport details
Financial Data	This includes financial data such as your account status and history, transaction data, contract data or details of other Drogheda Credit Union products you hold with us. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status,

When you apply for a Credit Union loan, and during the course of your loan we collect the following information	
Category of Personal Data	Description
	mortgage details, first time buyer details, other loans and debts, previous addresses, spouse or partners details, pension details and criminal sanctions.
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.
Biometric Data	This includes geometric facial recognition. (Online only)
Web Data	When you apply for a loan 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. (Online only)
Log Data	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. (Online only)
Health data	You complete a health declaration form for the purposes 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.
PPSN	Your Personal Public Services Number (PPSN) will be collected, if not already on file to meet our reporting requirements to the CCR (Central Credit Registrar).
Marketing Data	This includes your preferences in receiving marketing from us and your communication preferences.

We need all the categories of information in the list above to allow us to; identify you and contact you and in order that we perform our contract with you.

How we use particularly sensitive personal data

“Special categories” of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policy.
- 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.

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 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.		
Purpose of Processing	Categories of Personal Data	Lawful Basis
To process your application for a loan;	<ul style="list-style-type: none"> • Contact Data • Financial Data • Web Data 	<ul style="list-style-type: none"> • Contract
To assess your application for a loan;	<ul style="list-style-type: none"> • Contact Data • Financial Data • PPSN 	<ul style="list-style-type: none"> • Legal Obligation • Legitimate Interests
To provide loan drawdown and to manage the repayment schedule To provide you with information about the performance of your loan; To provide support services;	<ul style="list-style-type: none"> • Contact Data • Financial Data • Correspondence Data • Log Data 	<ul style="list-style-type: none"> • Contract
To administer the ILCU Loan Protection Scheme;	<ul style="list-style-type: none"> • Contact Data • Financial Data • Health Data 	<ul style="list-style-type: none"> • Contract • Explicit Consent
To implement credit control measures where there are missed loan repayments; To carry out credit control including collecting and enforcing debts and arrears	<ul style="list-style-type: none"> • Contact Data • Financial Data • Log Data 	<ul style="list-style-type: none"> • Contract
To comply with our legal reporting obligations in respect of the Central Credit Register (CCR);	<ul style="list-style-type: none"> • Contact Data • Financial Data • PPSN 	<ul style="list-style-type: none"> • Legal Obligation
To interact with the regulator and the Central Bank of Ireland for reporting, compliance, and auditing purposes; To engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;	<ul style="list-style-type: none"> • Contact Data • Financial Data 	<ul style="list-style-type: none"> • Legal Obligation

Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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 controllers in their own right¹. 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.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loans assessment and anti-money laundering purposes and compliance with our legal duties in that regard.

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.

Third Parties

We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with data protection law.

Planned data transmission to third countries

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

¹ As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.



within the EEA also. Data may be transferred from 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.

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.

Guarantors

As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that Drogheda Credit Union ensures 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 indebtedness. 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 disclose 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.

The ILCU Savings Protection Scheme (SPS)

We may disclose information in any application from you 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 and fulfilling requirements under our affiliation to the ILCU, and the SPS.

The privacy notice of ILCU can be found at www.creditunion.ie

Insurance

As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable).

If you choose to take out a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that Drogheda Credit Union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

Assessment

When assessing your application for a loan, Drogheda Credit Union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing Drogheda Credit Union file,
- your credit history from 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 not to lend recklessly.

Member Service

To help us improve our service to you, 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-chargee, 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.

We have a legal duty while processing personal data to comply with Irish or EU Law:

Regulatory and 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.

Purpose of the loan

We are obliged to ensure that the purpose for the loan falls into one of our categories of lending.

Compliance with our anti-money laundering and combating terrorist financing obligations

The information provided by you will be 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”), the Criminal Justice (Money Laundering and Terrorist Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives).

Audit

To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes and they are bound by confidentiality.

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 and guarantor to the CCR.

House Loan

Where you obtain a house 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 in order 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 in order 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 Interest is when we as a Credit Union have a business or commercial reason to use your information. Even then, we must not unfairly go against what is right and best for you. In situations where we rely on legitimate interests we will tell you what it is.

Credit Assessment

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.

Our Legitimate Interest: Drogheda Credit Union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for.

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.

Our Legitimate Interest: Drogheda Credit Union, where appropriate, will take steps to recover a debt to protect the assets and equity of Drogheda Credit Union.

Judgements Searches

We carry out searches in Stubbs Gazette to assess your credit worthiness to repay a loan.

Our Legitimate Interest: Drogheda Credit Union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. In carrying out such a search we can better determine your overall financial position in order to lend to you.

5. Sources of Personal Data

We receive information from you when you apply for a loan from us either in-branch or online.

This information is collected from you directly through the loan application form 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 the CCR (Central Credit Register) 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.

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.

If you fail to provide personal data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.

6. Retention of Loan information

Our retention policy is as follows:

Purpose	Retention Period
Loan application and approval, loan administration	Loan discharge + 7 years
Incomplete loan applications	Application date + 6 months
Loan applications cancelled by member	Cancellation date + 6 months
Denied Loan application	Date of denial + 7 years
Expired loan application	Date of loan approval + 6 months

Once the retention period has expired, the respective data will be permanently deleted.



Note that this data privacy notice relates only to how we process data relating to the processing of Credit Union loans.








We have data 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

Please see our General 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).

	<ul style="list-style-type: none"> • To find out whether we hold any of your personal data, if we do, to request access to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.
	<ul style="list-style-type: none"> • Request correction 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.
	<ul style="list-style-type: none"> • Request erasure 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).
	<ul style="list-style-type: none"> • Object to processing 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.
	<ul style="list-style-type: none"> • Request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.
	<ul style="list-style-type: none"> • 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.
	<ul style="list-style-type: none"> • 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. <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>

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 avail of either of these rights, please contact us at info@droghedacu.ie.