

ONLINE BANKING USERS – PRIVACY NOTICE

1. Overview

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

Note: You must be an existing Credit Union member to apply for an online banking account. To see how we process your data in relation to your Credit Union Membership please see our Member Accounts privacy notice.

2. Categories of Personal Data

We process personal data as a result of your interaction with our online banking services.

When you register for and use our online banking facility, we process the following categories of personal data.	
Category of Personal Data	Description
Identification Data	This includes name, marital status, title, date of birth, gender. It includes verification data required to identify you as the holder of the account.
Registration data	This includes email address, username, and password (hashed).
Log data	This includes data about your use of our online banking services, including data about the time and date of your interaction as well as IP address and transaction information.
Financial Data	This includes financial data such as your account status and transaction data as well as information on accounts that you set-up for online transactions.
Correspondence Data	If you complete an online enquiry form, we will record details of your enquiry and our correspondence.
Biometric Data	This includes geometric facial recognition.

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 online banking in order to provide a secure service and to process your online banking instructions.		
Purpose of Processing	Categories of Personal Data	Lawful Basis
To register you for online banking services	<ul style="list-style-type: none"> Registration data 	Contract

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Purpose of Processing	Categories of Personal Data	Lawful Basis
To process your online banking instructions	<ul style="list-style-type: none"> Financial data 	Contract
To support your online banking interactions	<ul style="list-style-type: none"> Correspondence data Identification Data 	Contract
To manage security of online banking services	<ul style="list-style-type: none"> Log data 	Legitimate Interests

4. Sources of Personal Data

We receive information from you when you register for online banking services and whenever you interact with those services from logging into your online banking account to carrying out financial transactions on your Credit Union account using online banking facilities.

We may receive information from you if you apply for a loan using the online banking facility. When you apply for a loan through the online banking service, we collect the same information to process your loan application as we would collect when you apply for the loan in person at the Credit Union. (See our Loan Accounts privacy notice for further information about how we process your Personal Data in relation to loans).

This information is collected from you directly because of your interaction with the Credit Union online banking 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 online banking services is kept until you delete your online banking account. Personal data relating to your membership will be retained from 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 Online Banking services.

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 Account

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).

	<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**](mailto:info@droghedacu.ie).