

# **WEBSITE USERS - Privacy Notice**

#### 1. Overview

We want to explain clearly how we process personal data in relation to users of our website.

For the purposes of this Privacy Notice a Website User is any individual who visits the Drogheda Credit Union website (the "**Website**"). A Website User may or may not be a member of the Credit Union.

We collect Personal Data relating to Website Users and this privacy notice provides specific information relating to the information collected. For more information please see our Data Protection Statement available on our website.

### 2. Categories of Personal Data

We source website user information in order to improve our services and develop the Website.

When you visit the Credit Union website, we collect the following information		
Category of Personal Data	Description	
Contact data	This includes email address, phone number, postal address.	
Web Data	This includes 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. For more information on the cookies we collect, please see our Cookies Privacy Notice.	
Biometric Data	This includes facial recognition technology. (When applying for membership online only.)	
Log Data	This includes data about your use of our online services, including data about the time and date of your interaction as well as IP address and transaction information.	
Correspondence Data	If you complete an online enquiry form, we will record details of your enquiry and our correspondence.	
Social media data	We receive Personal Data about Website Users when they follow social media links on our website.	



#### 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 from website visitors to understand what services our website visitors are interested in and to engage with you further in relation to those services.

Purpose of Processing	Categories of Personal Data	Lawful Basis
To manage your website experience and improve our website content	Web Data	Legitimate Interests Consent
To respond to enquiries about our services	Contact Data Correspondence data	Legitimate Interests
To market our services to you through social media interactions	Social media data	Legitimate Interests Consent
To market our services directly to you through newsletters and marketing emails	Contact Data	Consent
To manage website security	Web data	Legitimate Interests

#### 4. Sources of Personal Data

We receive information from you when you visit our website, when you complete an online form on our website, if you subscribe to our newsletter or if you follow us vis social media links on our website.

This information is collected from you as a result of your interaction with the Credit Union website.

#### 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, website data is retained for a maximum of 12 months. For further information please see our Cookie Notice available on our website.

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

We have Data Protection Statements 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 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).

Q	<ul> <li>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.</li> </ul>
<b>√</b>	• 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> <li>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).</li> </ul>
	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.
RESTRICTIONS APPLY	Request the restriction of processing 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 Postal Address: Data Protection Commissioner
Web Form: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a> 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 <a href="mailto:info@droghedacu.ie">info@droghedacu.ie</a>.