

Member Accounts - Privacy Notice

1. Overview

To provide our Credit Union services, we need to collect Personal Data relating to our members. This privacy notice provides more detailed information about the processing activities of the Credit Union relating to member accounts. This privacy notice also covers online membership applications.

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

2. Members and their representatives

Our members are individuals to whom we provide our Credit Union services, for example operating savings and budget accounts or offering loans or online banking services.

For the most part we transact directly with members in relation to the operation of the Credit Union account. On occasion we may transact with relatives, beneficiaries, guarantors, relations, or representatives who are acting on behalf of a member.

When we transact with a representative individual on behalf of a member, we will also collect limited additional Personal Data about that person. These situations may arise as follows:

- a person who is nominated as beneficiary on the account in the event of the members death;
- a person with power of attorney on a member account;
- a parent/guardian who is supervising a juvenile account
- a person who acts as guarantor on a member's loan;
- a legal representative of a member who communicates with us on the member's behalf.

3. Categories of Personal Data

This Data Protection Statement provides information relating to the categories of Personal Data we process.

When you become a member and when we are operating your account, we collect the following information	
Category of Personal Data	Description
Identification Data	This includes name, marital status, title, date of birth, gender, PPSN, photographs, job title and employer. It also includes background and verification data such as a copy of passports or utility bills as well as other information we require to comply with our obligations under anti-money laundering legislation.
Web Data	When you apply for membership online, we collect details such as username and password in (order to create an account), information about your interactions with the online banking facility such as your IP Address, time and date of interactions and the progress of your application. (Online only)
Biometric Data	This includes facial geometry recognition. (Online only)

When you become a member and when we are operating your account, we collect the following information	
Category of Personal Data	Description
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)
Contact Data	This includes email address, phone number, postal address, billing address.
Financial Data	This includes financial data such as your account status and history, transaction data, contract data, details of the Credit Union products being used. 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 or partners.
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 communication preferences.

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 member services to you. If we look for consent, we will always ensure that Credit Union Members know what they are consenting to.		
Purpose of Processing	Categories of Personal Data	Lawful Basis
Member Application and account set-up and administration	<ul style="list-style-type: none"> • Identification Data • Biometric Data (Online member account application) • Contact Data • Correspondence Data • Financial Data 	Contract
To maintain your account; To enable you to transact on your account; To provide you with information about the operation of your account;	<ul style="list-style-type: none"> • Identification Data • Contact Data • Correspondence Data • Financial Data 	Contract

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 member services to you. If we look for consent, we will always ensure that Credit Union Members know what they are consenting to.

Purpose of Processing	Categories of Personal Data	Lawful Basis
<p>To administer the ILCU Savings Protection Scheme;</p> <p>To administer insurance products and services offered to Credit Union members such as Life Savings, Loan Protection, Death Benefit Insurance and Disability Cover;</p>	<ul style="list-style-type: none"> Contact Data Financial Data 	Contract
<p>To offer you additional services associated with Credit Union membership such as online banking, foreign exchange services and loan facilities.</p> <p>To keep you informed of new Credit Union services that may be of interest to you</p>	<ul style="list-style-type: none"> Contact Data Marketing data 	<ul style="list-style-type: none"> Legitimate Interest Consent
<p>To comply with our legal obligations in respect of the collection of taxes, levies, contributions;</p>	<ul style="list-style-type: none"> Identification Data Biometric Data (Online member account application) Contact Data Financial Data 	Legal Obligation
<p>To interact with the regulator and the Central Bank of Ireland for reporting, compliance, and auditing purposes;</p> <p>To engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;</p>	<ul style="list-style-type: none"> Identification Data Biometric Data (Online member account application) Contact Data Correspondence Data Financial Data 	Legal Obligation
<p>To comply with legal obligations connected with “know your customer” requirements under anti-money laundering laws, or under anti-money counter terrorist financing law</p>	<ul style="list-style-type: none"> Identification Data Biometric Data (Online member account application) Contact Data Financial Data 	Legal Obligation

5. Sources of Personal Data

We have set out below the sources of personal data we collect.

We receive information about you initially when you join the Credit Union and open an account with us. We will ask you for certain information to be provided during the membership application process.

This information is collected from you directly through the Membership application form or from you and other people with whom you operate a Credit Union account such as a joint account or a club or society account.

We receive information from you during the course of your relationship with us such as:

- updates to your account information should any of your account details change
- information related to transactions on your account
- information you supply when you communicate with us about the operation of your account
- information you supply when you take up our services such as applying for loans or activating an online banking facility

We may collect your Personal Data from a 3rd party when we conduct background checks, including “know your customer” checks.

We may receive information about you from a representative when they transact on your account or communicate with us on your behalf.

6. Retention of Personal Data

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

Our retention policy is as follows	
Purpose	Retention Period
Member Application and account set-up and administration	Account closure + 7 years
Budgeting services such as MABS	Account closure + 7 years
Member insurance Services	Account closure + 7 years
Other member benefits including competitions and member draws	12 months
Marketing and promotion of our business	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe
Administration of our relationship	Account closure + 7 years Correspondence Data

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

Note that this privacy notice relates only to how we process data relating to member accounts.










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 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.