



FIRST CHOICE Credit Union

MAKING MORE POSSIBLE

Privacy Notice of First Choice Credit Union Limited

First Choice Credit Union (FCCU) is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information and is effective from May 21st 2018.

1. First Choice Credit Union Contact Details:

Address: Head Office, Market Square, Castlebar, Co. Mayo, F23 NW25.

Phone: 094 9022969

Email: dataprotection@fccu.ie

2. The purpose and legal basis for processing your information:

Processing of data is necessary to allow FCCU to carry out its day to day operations, to meet its objectives and to comply with legal and regulatory obligations. We collect personal information from you, for example, when you:

- open an account;
- make a deposit;
- apply for products and services;
- complete transactions;
- look for advice.

We gather and process your personal information for a number of reasons and rely on a number of different legal bases to use that information as set out below:

To comply with legal obligations

FCCU are required to process your personal information to comply with certain legal obligations, for example:

- to meet our obligations under the Credit Union Act 1997 (as amended) and other financial services legislation and codes of practice.
- to report and respond to queries raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland, the European Central Bank and An Garda Síochána.
- to respond to requests from the Revenue Commissioners in accordance with relevant tax legislation.
- to verify the personal information provided to us and meet our legal and compliance obligations, including to prevent money laundering, tax avoidance, financing of terrorism and fraud.
- to pass details of the originator or the payee to the receiving or transferring financial institution.
- to supply information to the Central Credit Register as required by law.
- to cooperate and provide information requested in legal and/or regulatory investigations or proceedings.
- to comply with Central Bank of Ireland Regulations to determine whether you are a connected borrower or related party.

To enter into and perform a contract for a product or service

Before FCCU provides you with products or services, we have to gather some personal information to assess the terms upon which we can enter into the contract with you. Examples of processing include the administration of accounts, payments, deposits, lending, credit decisions etc.

For our legitimate business interests

A legitimate interest is when we have a business or commercial reason to use your information:

- FCCU may process your information to manage our business and financial affairs and to protect our members, employees and property. It is in our interests to ensure that our processes and systems operate effectively. This may include processing your information to monitor, maintain and improve internal business processes, ensure business continuity and disaster recovery, ensure network and information security, perform financial and regulatory accounting, protect our legal rights and interests and monitor our properties and branches e.g. CCTV. We record phone conversations both incoming and outgoing for the purpose of verifying information and quality of service. We also collect information through our website, app and social media. Please refer to our Cookies Policy on our website for details on our use of Cookies.
- Credit Assessment and Credit Reference Agencies: When assessing your application for a loan, FCCU also utilises credit data from credit referencing agencies such as the Irish Credit Bureau and the Central Credit Register. The 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. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance. The Irish Credit Bureau are using legitimate interests as the legal basis for processing of your personal and credit information. These legitimate interests are promoting greater financial stability by supporting a full and accurate assessment of loan applications, aiding in the avoidance of over-indebtedness, assisting in lowering the cost of credit, complying with and supporting compliance with legal and regulatory requirements, enabling more consistent, faster decision-making in the provision of credit and assisting in fraud prevention. ICB's Fair Processing Notice is available at [http://www.icb.ie/pdf/Fair Processing Notice.pdf](http://www.icb.ie/pdf/Fair%20Processing%20Notice.pdf)

Where you have provided consent

- **Marketing Consent:** We may sometimes use your personal information to make you aware of products and services which may be of interest to you if you have consented to such communications. You have a right to notify us free of charge at any time of your right to refuse such marketing by writing to the Marketing Department, First Choice Credit Union, Market Square, Castlebar, Co. Mayo, by emailing marketing@fccu.ie or by using the "opt-out" options in any marketing message we send you.
- **Sensitive Information Consent:** We sometimes collect and process information on your health and other sensitive information which you share with us while applying for a product or service or when requesting a change to an existing product or service. The FCCU staff member you are dealing with will ask for your consent to process this type of personal information and will follow strict procedures when processing this information.

If you choose to enter into our **Members' Draw**, we will use your personal information to enter you into the draw and where you are a winner your name will be published on our website as a winner and on our social media and other digital media channels. This credit union is involved with the **Art Competition** in liaison with the Irish League of Credit Unions (ILCU). Upon entry you will be given further information and asked for your consent to the processing of personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16 then we ask that the parent/legal guardian provide the appropriate consent. This credit union is also 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. 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.

3. What personal data do we collect?

We may collect, store, and use the following categories of personal information about you depending on the products/services we provide to you.

| Information Type | Example of how we use it |
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| Name, address, email address, telephone numbers. | We use this information to send you information about products or services, membership issues such as AGM booklets and also to respond to your queries. |
| Date of birth, PPSN, nationality, proof of identity and proof of address including driving license, passport and utility bills. Details on your expected turnover, origin/source of funds and the purpose of your account. | We use this information to verify your identity and to comply with our obligations under anti-money laundering legislation. |
| Occupation and income details such as employer name, employment status, your salary, other incomes, expenses. Information concerning marital and family status, the activity and balances on your accounts and your transactions. Partner and dependents details. Information gathered from applications for our products and services and your application for membership. | We use this information to assess your application for products or services, and process your transactions with us. We continually monitor and analyse transactions, financial behaviour and electronic devices to detect and prevent financial crime and cyber-attacks. This enables us to protect and secure our customers information, our networks and our financial interests. We share information with third parties to prevent financial crime, report fraud, manage our risks and protect both our interests. |
| Interactions with our staff including notes of your calls with our staff on our database. | We use this information to keep a record of your interactions with us. We record phone conversations both incoming and outgoing for the purpose of verifying information and quality of service. |
| Information about your physical or mental health. | With your consent we use this information to assess insurance coverage relating to products or services. |
| Information obtained from other parties such as credit reference agencies, Central Credit Register or joint account holders. | We use this information to assess your application for products or services. Where a loan is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register in respect of the borrower. Where a loan is granted in the sum of €500 or more, the credit union is obliged to report both personal details and credit details of the borrower and any guarantors to the Central Credit Register. |
| Images from CCTV camera in and around the credit union premises. | We use these images for security purposes. |
| Guarantor Details | We use this information to ensure repayment of the loan and to facilitate the requirements of the contract. We may contact the Guarantor to contact them in respect of the guarantee in the event of the change of circumstance of the member/ member getting into arrears. The information types listed above may also be collected for guarantors as part of the credit checking process. |
| Connected Borrowers/Related Parties: | We are obliged further to Central Bank of Ireland Regulations to identify where borrowers are |

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| | <p>connected in order to establish whether borrowers pose a single risk. We are also obliged to establish related parties. The Credit Union Act 1997 (Regulatory Requirements) Regulations 2016 defines related party as:</p> <ul style="list-style-type: none"> • a member of the board of directors or the management team of a credit union; • a member of the family of a member of the board of directors or the management team of a credit union; or • a business in which a member of the board of directors or the management team of a credit union has a significant shareholding. |
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4. Who do we share your personal information with?

FCCU sometimes shares your personal information with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. 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 right. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third parties we share information with can include:

- Third party service providers which perform services and functions on our behalf such as our accountants, auditors, IT service providers, printers, debt collection agencies, solicitors, legal advisors and other business advisors.
- Credit reference agencies including the Irish Credit Bureau and the Central Credit Register. Through these agencies we can check your credit history and debts. We also provide them with details regarding the products and services you have with us and we update them about your repayment record.
- Regulators including the Central Bank of Ireland. We allow authorised people to see our records for reporting, compliance and auditing purposes. We may also share information with certain statutory bodies such as the Department of Finance, the Department of Social Protection, the Data Protection Commissioner, and An Garda Síochána if required by law.
- The Revenue Commissioners. Under the “Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008” credit unions are obliged to report details to the Revenue Commissioners in respect of dividend or interest payments to members, which include PPSN where held.
- The Irish League of Credit Unions (ILCU) provides professional and business support services such as public affairs representation and insurance services to affiliated credit unions. We may disclose information to the ILCU for the purpose of the ILCU providing these services to us. As part of the ILCU Savings Protection Scheme (SPS) we may disclose information to the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS.
- To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external auditor. We will allow the external auditor to access our records for these purposes.
- Companies or financial institutions that assist us to process your transactions.

- Companies or financial institutions that assist us to provide Member Personal Current Account Services (MPCAS) and debit card services. 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 <http://currentaccount.ie/files/tpl-privacy-policy.pdf>
- Printing and distribution agencies to communicate with you e.g. posting of AGM Booklets
- Insurance companies including ECCU. Where your loan is insured with ECCU we may provide them with certain information where you have provided consent.
- Guarantors: We may contact the Guarantor in respect of the guarantee in the event of the change of circumstance of the member/ member getting into arrears.

FCCU require that these third parties provided sufficient guarantees that the necessary safeguards and controls have been implemented to ensure there is no impact on your data rights or the security of your data.

5. How long will FCCU retain your personal information?

FCCU will retain your personal information for the purpose of satisfying any legal, accounting or reporting requirements. For example, we are required to retain some member information for 7 years after the end of the member relationship. We may hold your personal information for longer if required to do so by law.

6. Transfers outside the European Economic Area (EEA)

FCCU sometimes need to share information with organisations which are located or who otherwise undertake processing outside the EEA. We will only transfer personal information to a country or territory outside of the EEA if that country and processor provides an adequate level of protection.

7. Automated Processing

We may sometimes use systems to make decisions based on personal data. This information is used for loan-assessment, provisioning and compliance with our legal duties in those regards.

8. How can you control the personal information you have provided to FCCU?

You have several rights under data protection law in relation to how we use your personal information. You have the right free of charge to:

- To find out whether we hold any of your personal data and if we do to request a copy of that data. You are also entitled to request further information about the processing.
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no legitimate reason for us continuing to process it.
- Request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.
- 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.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. We may 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 information is not disclosed to any person who has no right to receive it.

9. How do FCCU keep your information safe?

FCCU uses a variety of security technologies and procedures to help protect your personal information from unauthorised access, use or disclosure. We use internal technical and organisational measures to protect your personal information from unauthorised access, to maintain data accuracy and to help ensure the appropriate use of your personal information. These security measures include firewalls, intrusion detection systems, physical protection and strong security of facilities where your personal information is stored.

10. If you fail to provide personal information

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.

11. The right to lodge a complaint with a supervisory authority

If you have a complaint about the use of your personal information, please let a member of staff in your branch know. If you wish to make a complaint you may do so in person, by phone, in writing and by email which will be dealt with in accordance with FCCU's complaints policy. We fully investigate all complaints we receive. You can also contact the Office of the Data Protection Commissioner on the below details:

Email: info@dataprotection.ie

Phone: on +353 (0)57 8684800 or +353 (0)761 104 800

Write to the Data Protection Office: Canal House, Station Road, Portarlinton, Co. Laois, R32 AP23

12. Updates to this notice

We may update this data protection statement from time to time. Any updates will be made available and, where appropriate notified to you. The most recent version will always be available at <https://firstchoicecreditunion.ie/>. We will inform you of material changes to the content of the Data Protection Notice through a notification posted on our website or other communication channels.