



FIRST CHOICE
Credit Union

MAKING MORE POSSIBLE

Recruitment 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 as part of recruitment and selection processes for employees, contractors, consultants, directors, officers and volunteers.

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:

This privacy notice describes how we process personal data about you during the recruitment and selection process for any position with us. It relates to all potential applicants to FCCU including employees, contractors, consultants, directors, officers and volunteers. This privacy notice does not relate to FCCU's data processing activities for Officers. If you are successfully recruited, a copy of our Officer's Privacy Policy will be provided to you. To process personal data, we must have a legal basis to do so. The legal bases for processing your data are set out below:

To comply with legal obligations

This basis is appropriate when we are processing personal data to comply with an Irish or EU Law including:

- Data processed to meet statutory responsibilities relating to taxation and employment laws.
- Checks to ensure that you are eligible to work in the Republic of Ireland.
- Checks to undertake relevant criminal record as permitted by law for specific functions/roles only.
- Checks required to ascertain your fitness to work and working capacity for example pre-employment medicals and occupational health assessments.
- We are required by law to ensure that Officers meet Fitness and Probity Standards as prescribed by the Central Bank of Ireland.

To enter into and perform a contract

We are required to process your personal data to meet our duties under your contract of employment.

For our legitimate business interests

A legitimate interest is when we have a business or commercial reason to use your information. Below are some examples:

- We record CCTV images inside and outside of our office for public safety and crime prevention.
- We record phone conversations both incoming and outgoing for quality, training & verification purposes.
- We may assess your skills, qualifications, and suitability for the position.
- Communicate with you about the recruitment process.
- To maintain records of recruitment and selection processes.
- Keep records related to our hiring processes in case you wish to exercise any rights relating to the data and quickly and accurately resolve any disputes

Vital Interests

The Processing is necessary to protect the vital interests of the data subject or another individual. In the event of an emergency it will be necessary

3. What personal data do we collect?

We may collect the following information during the recruitment and selection process:

- The information you have provided to us in your application form/curriculum vitae and covering letter.
- Your name and contact details such as your address, home and mobile phone numbers and email address.
- Details of your qualifications, experience, employment history including job titles, salary and working hours and interests.
- Any information you provide to us by email, via our website, telephone or during an interview.
- Other information included as part of the application process, such as aptitude test results.
- Details of your referees.
- CCTV footage when you visit our offices.

We may also collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment and volunteering history, including details of any conduct or performance issues, appraisals, fulfilment of duties of the role, time and attendance, from references obtained.
- Information regarding your academic and professional qualifications.
- Where applicable, information regarding your criminal record, in criminal records checks and credit history and any other data revealed during background screenings.
- Visa/Immigration/right to work or residential status.
- A copy of your driving licence if relevant to the position you are applying for.

We may collect, store and use the following "special categories" of more sensitive personal information:

Health Data

- **Health Data:** You may be asked to attend a pre-employment medical or occupational health assessment; this will be carried out by a medical practitioner chosen by FCCU. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments.
- **Information about criminal convictions and financial soundness:** We may only use personal data relating to criminal convictions where the law allows us to do so. We will only collect personal data about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. We are required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, when undertaking assessment for the Fitness and Probity regime, you may be required to self-certify in respect of your criminal history. Where we do process criminal data, we will ensure that appropriate additional safeguards as required by the Data Protection Acts are in place.
- **Nationality:** We will use information about your nationality to establish if we require a work permit for you to be eligible to work for us.

4. Who do we share your personal information with?

We may also need to share some of the above categories of personal data with other parties, such as HR consultants, the Irish League of Credit Unions (ILCU), insurers and professional advisers. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions. The recipient of the information will also be bound by confidentiality obligations. We may also be required to share some personal data with our regulators, the Central Bank of Ireland, government agencies or as otherwise required to comply with the law.

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?

If your application is unsuccessful, we will retain your personal data for a period of 12 months after we have communicated our decision to you about whether to appoint you to the position including volunteer roles. We retain your personal data for that period so that we can show that we have conducted the recruitment exercise in a fair and transparent way. Once the retention period has expired, the respective data will be permanently deleted. Details about how we process your personal data as an Officer of FCCU is set out in our Officer Privacy Policy which will be provided to you.

If we wish to retain your personal data on file, on the basis that a further opportunity may arise in the future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal data for a fixed period on that basis.

6. Transfers outside the European Economic Area (EEA)

FCCU does not currently and does not anticipate the transmission of any recruitment related personal data to countries outside the EEA.

7. Automated Processing

FCCU does not use any form of automated decision making in relation to recruitment processes. This means that no decision is made about you based solely on automated processing with no human interaction. Should this ever change, you will be notified in advance.

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 will not be able to process your application successfully and you will be eliminated from the recruitment process.

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 privacy notice 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/>.