



General Privacy Notice of People First Credit Union Limited

People First Credit Union is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how we collect and use personal data about you during and after your relationship with us. This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes and further processing that may be necessary if you apply for a loan/other services with us.

Our Contact details are:

Address: Portlaoise Branch : James Fintan Lalor Avenue, Portlaoise, Co Laois.
Abbeyleix Branch: Credit Union House, Main Street, Abbeyleix, Co Laois.
Athy Branch: 3 Emily Row, Athy, Co Kildare.

Phone: 057 8622594

Email: info@peoplefirstcu.ie

Data Protection Officer Email: dataprotection@peoplefirstcu.ie

Web: www.peoplefirstcu.ie

Purpose of Data Collection, Processing or use

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted for the purpose of facilitating the abovementioned objectives.

What personal data do we use?

We may collect, store, and use the following categories of personal data about you:

- Your name, member number, address, date of birth, identification documents, email address, telephone number(s), biometric facial recognition for online membership applications, signatures, place of birth, nationality, Politically Exposed status, marital/civil status, marriage/civil partnership cert, the credit union products you hold with us, names and addresses of nominees on your account, source of funds, source of wealth, credit history, transaction data, financial data, contract data, details of salary, occupation, income verification, income and expenditure details, assets and liabilities, Creditors and Debtors details, bank statements, Director/Shareholder ownership, Financial Accounts, accommodation status, mortgage details, property details, previous addresses, spouse/partners details, spouse/partners income details, dependents details, tax status, Tax Clearance Certificate, Tax Identification/PPSN numbers, Tax Residency, beneficial ownership status, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings, IP address, online identifiers (i.e. cookies)

The purposes for which we use your personal data:

The credit union will use your personal data to assist it in carrying out the following:

- To open and maintain an account for you.
- To meet our legal and compliance obligations and requirements under the Rules of the Credit Union, the Credit Union Act 197(as amended) and Central Bank Regulations.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligation for example anti-money laundering and beneficial ownership reporting obligations.
- Administering any applications for services or products you make and to ensure the provision of that product or service to you.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- In order to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering any loan application you may make or any loans you have taken with us, including where necessary, taking steps to recover the loan or enforce any security taken as part of the loan.

- We may use credit scoring techniques and other automated decision-making systems to either partially or fully assess your application.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and other services by way of direct marketing to you.
- When acting as an insurance intermediary, to meet our obligations.

We may also collect, store and use the following “**special categories**” of more sensitive personal data:

- Information about your health, including any medical condition, health and sickness (See **Insurance** for further details)
- Biometric facial recognition for online membership applications

We need all the categories of information in the list above to allow us to identify you and contact you and in order that we perform our contract with you.

We also need your personal identification data to enable us to comply with legal obligations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

The purposes for which we use your sensitive personal data

The Credit Union will use your personal data to assist it in carrying out the following:

- To allow us to underwrite loan applications
- To allow us request confirmation of Loan Protection and Life Savings Protection from ECCU Assurance DAC (ECCU), a life insurance company wholly owned by Irish League of Credit Unions (ILCU)
- To allow us process any claims made under the Loan Protection and Life Savings Cover from ECCU

How we use particularly sensitive personal data

“Special categories” of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Data Protection Policy.
3. Where it is needed in the public interest, and in line with our Data Protection Policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

How secure is my information with third-party service providers?

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 right¹. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations.

If you fail to provide personal data

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.

Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loan assessment, provisioning and anti-money laundering

¹ As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.

purposes and compliance with our legal duties in that regard. We also carry out profiling in order to tailor our marketing to you by profiling members according to categories such as age, loan history, savings, life cycle and date of account opening.

Automated decision Making

We may use automated decision making to enable us to deliver decisions within a shorter time frame and to improve the efficiency of our processes. When you apply for a loan we use data from different sources to look at your ability to repay the loan. The automated decision making is based on personal information you have provided and /or information we are allowed to collect from third parties - such as credit reference agencies- about you or your organisation. The information we process for automated lending decisions includes amount requested, repayment period, your income, your employment details, financial statements, transaction history, salary, spending and bills, credit rating, other loans held by you. The decision process takes into account this information to apply internal credit assessment rules in a consistent manner. This ensures your application for credit is treated fairly, efficiently and that we believe you can afford the required repayments. In certain circumstances you can object to a decision based on automated processing.

Data Retention Periods

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. Where possible we record how long we will keep your data, where that is not possible, we will explain the criteria for the retention period.

Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- **Accounting** records required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than six years from the date to which it relates.
- The **money laundering** provisions of anti-money laundering legislation require that certain documents must be retained for a period of five years after the relationship with the member has ended.
- We keep **income tax** records for a period of six years after completion of the transactions to which they relate.
- **Loan application** information is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.
- Credit agreements are **contracts** and as such the credit union retains them for seven years from date of repayment of loan and interest in full and twelve years where the document is under seal.
- **Loan applications** form part of your credit agreement and as such we retain them for seven years.
- **Membership Forms** and records will be retained for seven years after the relationship with the member has ended.
- **MYCU Membership Applications, Overdraft Applications** and records will be retained for eight years after the relationship with the member has ended
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one month.
- **Voice recordings** (both incoming and outgoing calls) which are used in the normal course of business i.e. for verifying information, training and quality of service are retained for three months.

Planned data transmission to third countries

For online membership applications **only**, biometric data is transferred to countries outside the EEA (European Economic Area) for a couple of seconds after it is uploaded. No data is held after that outside the EEA.

Updates to this Notice

We will make changes to this Notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website at www.peoplefirstcu.ie or alternatively you can ask us for a copy.

Our use and sharing of your information

We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use this information for the following purposes:



Fulfilling contract This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you

Administrative Purposes: We will use the information provided by you, either contained in this form or any other form or application, for the purpose of assessing this application, processing applications you make and to maintain and administer any accounts you have with the credit union.

Security: In order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or other personal assets.

Third parties: We may appoint external trusted third parties to undertake operational functions on our behalf such as sub-contractors, agents or service providers engaged by the Credit Union (including their employees, Directors and officers) such as back up and server hosting providers, printers, debt collection agencies, Solicitors, Auditors, Accountants, IT Software and maintenance providers, underwriting software service providers and suppliers of other back-office functions. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with Data Protection law. We may also share your personal information with any third parties to whom you have instructed us to share your information with.

Guarantors: As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that the credit union ensures the repayment of your loan. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we will give them details of the outstanding indebtedness. If your circumstances change it may be necessary to contact the guarantor.

Irish League of Credit Unions (ILCU) Affiliation: The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as marketing and public affairs representation, monitoring, financial, compliance, risk, learning and development, and insurance services to affiliated credit unions. As this credit union is affiliated to the ILCU, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information in your application or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

The ILCU Savings Protection Scheme (SPS): We may disclose information in any application from you or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS.

The Privacy Notice of ILCU can be found at www.creditunion.ie

Electronic Payments: If you use our electronic payment services to transfer money into or out of your credit union account (such as credit transfers, standing orders and direct debits) or make payments through your debit card into your credit union account, we are required to share your data with our electronic payment service provider CUSOP(Payments)DAC ("CUSOP") for the purpose of processing of electronic payments services on your account. The Credit Union is a participant of CUSOP. CUSOP is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. CUSOP is an outsourced model engaging third party companies, such as a Partner Bank (currently Danske Bank) to assist with the processing of payment data.

If you use our electronic payment services to transfer money into or out of your credit union account or make payments through with your debit card or MYCU Debit Card into your credit union account, we are required to share your personal data with our electronic payment service provider **Pay and Shop Limited trading as Global Payments.**

Insurance: As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC ("ECCU"), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable). If you choose to take out a loan with us and it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes

information about your health. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

Credit Assessment: When assessing your application for a loan, the credit union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing credit union file
- credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit unions lending policy.

Member Service: We may use information about your account to help us improve our services to you.

E-Signatures: if you use our E-Signature service to complete loan documents through the on-line computerised system that may result in **DocuSign Inc** coming into possession of personal data attributable to yourself. Where any such data is contained in a loan document which you have signed using an E-signature generated for you by DocuSign, it is intended that such document will have either been purged or redacted by DocuSign within a short time period after you have so signed the document.

Debit Card: Companies or financial institutions assist us to provide Member Personal Current Account Services (MPCAS) and debit card services. If we issue you with a MYCU debit card, UAB PayrNet (which is an authorised e-money institution) will also be a controller of your personal data.

Foreign Exchange: if you use our Foreign Exchange service we are required in some instances to share some of your personal data with our Foreign Exchange services provider (FEXCO)

Home Loans: Where you apply for a Home Loan, certain personal data may be shared with a third party. The company will ensure that the necessary legal paperwork and security is in place before the loan is drawn down. They will also administer any arrears which may occur on the home loan. See separate Mortgage Privacy Notice for details.



Legal Duty This basis is appropriate when we are processing personal data to comply with an Irish or EU Law.

Tax liability: We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction. Where a member is tax resident in another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions. 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 in respect of dividend or interest payments to members, which include PPSN where held.

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland, and the Data Protection Commission if required under law. **We are required to cooperate by law** or otherwise through a legal process with Irish and EU Regulatory and enforcement bodies such as Central Bank of Ireland, An Garda Síochána, the Courts, fraud prevention agencies and other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting, CRS and FATCA purposes.

Purpose of the loan: We are obliged to ensure that the purpose of the loan falls into one of our categories of lending.

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under The Money Laundering provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013 ("the Act"), the Criminal Justice (Money Laundering and Terror Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing)(Amendment) Act2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives). This will include checking/filing reports on the Beneficial Owners Register and on the Bank Account Register.

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.

Nominations: The Credit Union Act 1997 (as amended) allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. Where a member wishes to make a nomination, the credit union must record personal data of nominees in this event.

Incapacity to Act on your account: The Credit Union Act 1997 (as amended) provides, in the circumstances where you become unable to transact on your account, due to a mental incapability and no person has been legally appointed to administer your account, that the Board may allow payment to another who it deems proper to receive it, where it is just and expedient to do so, in order that the money be applied in your best interests. To facilitate this, medical evidence of your incapacity will be required which will include data about your mental health. This information will be treated in the strictest confidentiality.

Credit Reporting: 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 (CCR) 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 to the CCR.

House Loan: Where you obtain a house loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to forward your personal data to our Solicitors Piers & Fitzgibbon Solicitors who will process your personal data and engage with your Solicitors in order to have this charge registered on our behalf. See separate Mortgage Privacy Notice for further information.

Connected/Related Party Borrowers: We are obliged further to Central Bank Regulations to identify where borrowers are connected in order to establish whether borrowers pose a single risk. We are also obliged to establish whether a borrower is a related party when lending to them, i.e. whether they are on the Board/Management Team or a member of the Board/ Management team's family or a business in which a member of the Board /Management Team has a significant shareholding.



Legitimate interests A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Credit Assessment and Credit Reference Agencies:

When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar (see Legal Duty). We have used the Central Credit Register since June 2017.

Our legitimate interest: 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.

CCR use **Legitimate Interests (GDPR Article 6 (f))** 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. See CCR's Factsheet on how the Central Credit Register works which is available at <https://www.centralcreditregister.ie/about/how-it-works/> it documents who they are, how it works, who owns the information they hold and your rights i.e. your right to request a free copy of your credit report, right to place an explanatory statement on your credit report, right to ask to have your information amended and the right to place a notice of suspected impersonation on your Credit Report.

Judgements and/or Directorship Searches: We may carry out searches in Vision Net in order to assess your credit worthiness to repay a loan

Our Legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit history in order to determine your suitability for the loan applied for. In carrying out such a search we can better determine your overall financial position in order to lend to you.

CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security, for the prevention of theft, and for security of credit union staff, members, volunteers, visitors, contractors, public safety and the prevention and detection of fraud.

Our Legitimate interest: With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff, members, volunteers, visitors or contractors to the credit union and to prevent and detect fraud.

Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, clarification of instructions and quality of service

Our Legitimate interest: To ensure a good quality of service, to assist in training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes.



Your consent

We will only carry out the below processing when we have obtained your consent and will cease processing once you withdraw such consent.

Marketing and Market Research

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may include using the ILCU and/or specialist market research companies. We need you to opt-in or give prior consent before we can contact you via post, email, phone or text for marketing and promotional purposes. You can change your preferences at anytime by opting out or by emailing us at info@peoplefirstcu.ie or in writing to People First Credit Union, JFL Avenue, Portlaoise, Co Laois

Art Competition

This credit union is involved with the Art Competition in liaison with the ILCU. Upon entry parent/legal guardian will be given further information and asked for their consent to the processing of the child's personal data. This information is processed only where consent has been given. Where the person providing consent is below 16 years of age then we ask that the parent/legal guardian provide the appropriate consent. A separate Privacy Notice is included in all Art Competition Entry Forms

Schools Quiz

This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools Quiz is open to entrants aged 4 to 13 years of age. Upon entry parent/legal guardian will be given further information and asked for their consent to the processing of the child's personal data. This information is processed only where consent has been given. Where the person providing consent is below 16 years of age then we ask that the parent/legal guardian provide the appropriate consent. A separate Privacy Notice is included in all School Quiz Entry Forms.

Transferring to another Credit Union

People First Credit Union may assist you in transferring your account to another Credit Union. If you request us to do this, we will require your consent to transfer your personal data to the other Credit Union. For this transfer to take place you will usually be required to open an account in the other Credit Union first. We will then transfer your account balance and history (when requested) to the relevant Credit Union on your behalf

Financial Advisory Service

In relation to our Irish Life Referral service, with your explicit consent, People First Credit Union collects personal data from you (name and contact telephone number). This allows People First Credit Union forward your details for the purposes of requesting a call-back to arrange a meeting with a dedicated Irish Life Financial Planner. Once People First Credit Union passes on this Referral Consent to Irish Life we will not use this consent for any other purpose. To view Irish Life's Privacy Statement please see <https://www.irishlife.ie/ilfs-privacy-notice/>

Cookies

By continuing to use People First Credit Union's website and by not changing your web browser settings to disable cookies, you consent to the use of cookies. The Cookies Policy should be read in addition to the terms and conditions of the website and is subject to them. If there is any conflict between the Cookies Policy and the terms and conditions, the terms and conditions shall prevail. Our Website contains links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own cookie settings, and these are not endorsed by us. We do not accept any responsibility or liability for these third-party websites. Please undertake the appropriate due diligence before submitting any information to these websites. If you visit People First Credit Union's presence on social media sites, the cookies policy of that social media site will apply.

Your Rights in connection with your personal data are to:



Find out whether we hold any of your personal data, and **if we do to request access** to that data and to be furnished a copy of that data. You are also entitled to request further information about the processing.



Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.



Request erasure of your personal information. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).



Object to processing of your personal data 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 data for direct marketing purposes.



Request the restriction of processing of your personal information. You can ask us to suspend processing personal data 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. '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.*

You have a **right to complain** to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone: 1800 437 737 / +353 (01)765 0100 E-mail: https://www.dataprotection.ie/en/contact/how-contact-us	Postal Address: Data Protection Commissioner, 21 Fitzwilliam Square South, Dublin 2. D02 RD28
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Please note that the above rights are not always absolute and there may be some limitations.

If you want access to 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 the Data Protection Officer in writing at People First Credit Union, JFL Avenue, Portlaoise, Co Laois or by emailing dataprotection@peoplefirstcu.ie.

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.