Privacy Notice

In accordance with Data Protection and Privacy law

V1.3

1 Clonakilty & Dunmanway Credit Union Limited as a data controller

Clonakilty & Dunmanway Credit Union CDCU is a member-owned financial organisation that provides financial services to its members. We are committed to the privacy of those that we engage with and this statement details our approach. While providing personal data to us in the course of business or using our website, we will manage your data in accordance with this privacy statement.

- Controller name; Clonakilty & Dunmanway Credit Union Limited
- Controller contact: if you would like to contact CDCU's data protection representative regarding this policy please email us at info@cdcreditunion.ie. or call on 023 883 3842

Personal data processed by Clonakilty & Dunmanway Credit Union is in accordance with current Data Protection Regulation in Ireland and the GDPR.

If you are under 18 please read this statement with the assistance of a parent or guardian

2 Key Definitions

Our or we or CDCU or Credit Union refers to Clonakilty & Dunmanway Credit Union Limited

You, Your, Member or Subject refers to the individual person whose personal data is the subject of the text.

Personal Data Information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as; a name, an identification number, location data, an online identifier, or one of more factors specific to the physical, psychological, genetic, mental, economic, cultural or social identity of that natural person.

Data Subject The identified or identifiable natural person

Special (often referred to as sensitive) data racial or ethnic origin, political opinions, religious or philosophical beliefs, or trades union membership, or that includes genetic data, biometric data to reveal the identity of a person, or data concerning health, sex life or sexual orientation. Personal data relating to criminal convictions is also considered sensitive.

Controller The natural or legal person or body which alone or jointly determines the purpose and means of the processing of personal data.

3 Purpose and lawful basis

The Credit Union processes your personal data for many reasons, and we are obliged to inform you of the purposes for which we use your data and legal basis for processing.

In general we may obtain personal data including name, address, phone numbers, e-mail address, other electronic identifiers, title, profession, images, IP address, photographic ID, company details, dependants or partner details, your bank or mortgage details, politically exposed status, tax identities, video recordings, e-mails and other information provided by you while engaging with the Credit Union and in particular while agreeing credit. We may also obtain similar information from third parties such as the Irish credit agencies, or

from your use of CDCU systems, or when you sign up to or attend events or otherwise engage with the credit union.

The purposes for processing your personal data may overlap, and some purposes for processing may have multiple legal basis. They are as follows:

Category	Purpose	Examples of the type of data processed	Legal basis for processing*
*Note; Where this document refers to the Legitimate interest of CDCU as a legal basis for processing, such legitimate interest refers to the management and delivery of the services of a Credit Union as provided for in the Credit Union Act 1997 as amended in 2012. Such processing also includes activities mandated, approved or deemed acceptable by Irish or EU regulatory or oversight authorities.			
Membership			
Application/membership administration	To initiate and manage our relationship with our members or potential members	General Personal Details; name, contact details, address, tax identities, date of birth, nationality, tax residency, financial position, proof of identity details, beneficial ownership details, related parties, security details, occupation, security facts, records of interactions with the CU.	- Entering into or performance of a contract - Consent - Legitimate interest of CDCU* - There is a legal / regulatory obligation
Savings & Current Account	To manage member savings accounts	General Personal Details plus source of funds, account turnover, bank details, record of transactions, and balances. For clubs or businesses, identity of officers	- Performance of a contract - Legitimate interest of CDCU* - There is a legal / regulatory obligation - Consent
The personal data of third parties	We may need to communicate with connected 3rd parties that are not members of the credit union to manage an event, to comply with law or regulation, or in relation to a financial product	Identification details, relationship, securities and address relating to partners, family, guarantors, beneficiaries, nominees or a director or representative of an entity or person	- Performance of a contract - Legitimate interest of CDCU* - There is a legal / regulatory obligation - Consent
Affiliation with the Irish League of Credit Unions ILCU or Credit Union Development Authority CUDA	Reporting and use of services provided by representative bodies and to fulfil our obligation in accordance with ILCU/CUDA rules	Member details and information relating to the provision of insurance	- Performance of a contract - There is a legal / regulatory obligation - Credit Union Act and amendments - Legitimate interest of CDCU*
Enquiries	To engage with individuals who make an enquiry	Details provided on the enquiry including name, and contact details	- Consent - Legitimate interest of CDCU*
Incapacity to act upon an account	When a person is unable to transact due to an intellectual incapacity - Appointment of an individual to administer the account or - board approval of transactions	All personal data	- There is a legal / regulatory obligation - Vital interest of the subject - Legitimate interest of CDCU*
Loans			
Loan applications and loan management	To manage the loan process and loan agreement including; assessing creditworthiness, validating	Personal details & proof of identity plus credit history/rating, monthly income/outgoings, payslips,	- Entering into or the performance of a contract. - There is a legal / regulatory obligation (Credit Union Acts, Anti

	information provided during the application process, determine if you are a connected or related party borrower, assessing credit history with the CCR, effecting a legal charge over an asset and to manage the loan account.	bank statements, connected party status, Marital status, spouse/partner/dependents details, property details, social welfare receipts, Declaration of Health, information relating to connected parties, details of a guarantor to the loan application, records of communication relating to a loan	Money Laundering legislation and Central Bank regulations) - Legitimate interest of CDCU*
Medical details	For the purpose of insurance	Medical details	- Performance of a contract (loan agreement insurance)
Credit Control	To manage the debt recovery process including credit searches and engaging with the Irish credit agencies, the recovery of debt, the transfer of debt and the enforcement of security or guarantee against a loan.	As above (for loan application and loan management)	- Performance of a contract (loan and membership agreements) - There is a legal / regulatory obligation - Legitimate interest of CDCU*
Identity details;	To establish the Identity, status, address and proof of identity of the parties to a loan	Identity data relating to the member, guarantors, nominees, family members or advisors	- Performance of a contract (loan and membership agreements) - There is a legal / regulatory obligation - Legitimate interest of CDCU*
Connected borrowers / Related parties	To establish to full risk exposure associated with a credit application	Relationship information relating to officers / directors of the CU	- There is a legal / regulatory obligation - Legitimate interest of CDCU*
Spouse / Partner	To assess a loan application, validate data provided on a loan application, perform a credit search with the CCR to establish credit status and comply with law or regulation.	Name, identification and contact details, financial and creditworthiness details, dependents, relationship with applicant	- Performance of a contract (loan and membership agreements) - There is a legal / regulatory obligation - Legitimate interest of CDCU*
Guarantors	To evaluate suitability / creditworthiness, inform of changes to performance of a loan, the collection of debt and comply with law or regulation	Name and contact details, financial details and creditworthiness, connected party status	- Performance of a contract (loan and membership agreements) - There is a legal / regulatory obligation - Legitimate interest of CDCU*
Insurance & Investments			
Life savings & Loan Protection Insurance provided By ECCU. This is a condition of taking a loan with the CU	To provide loan protection and life savings protection for loans issued.	Personal data relating to loan protection insurance. Loan protection insurance personal data may include 'special' personal data including medical records	- The performance of a contract. - There is a legal / regulatory obligation - Legitimate interest of CDCU*
Marketing & other activities			
Direct Marketing to Members	To inform members of the services of the CU and events that you may be interested in	Contact details including postal address, e-mail, text, phone, mobile phone. (You may opt out of any of the above upon request.	- Consent - Legitimate interest of CDCU*
Competitions or Quizzes	To hold a competition or draw for Members or members of the public	Name and contact details	- Consent - Legitimate interest of CDCU*
Surveys	To understand the requirements or views of subjects	Name and contact details	- Consent - Legitimate interest of CDCU*

Website	To promote the activities of the CU and to inform Members.	IP address, web tracking data	- Consent - Legitimate interest of CDCU*
CCTV			
CCTV recordings on all premises, both internally and externally	For safety and security	Motion images from cameras (not including voice)	- Legitimate interest of CDCU* or another party - and to protect the credit union in the event of security or safety incident or other unlawful event - Vital interest of subjects
Internal cameras	For safety, security and the monitoring of transactions and cash handling	Motion images from cameras (not including voice)	- Legitimate interest of CDCU* or another party - and to protect the credit union in the event of security or safety incident or other unlawful event and to monitor transactions and resolve disputes
General Legal/regulatory obligations			
Revenue	To comply with the requirements of Revenue, to pay all applicable taxes, enable tax audits and provide tax reports	Identity, PPs number, dividend or interest payments, tax residency, details relating to tax rules and income	- There is a legal / regulatory obligation
Regulatory Authorities	To enable processes that are compliant with law and regulation, and to facilitate audits and compliance reporting to the Central Bank of Ireland relating to Credit Unions, and any other mandatory requirements relating to the Credit Union		- There is a legal / regulatory obligation - Legitimate interest of CDCU*
AML	To comply with the Criminal Justice (money laundering and terrorist financing) Act and Amendments	Name, Identification, proof of address, date of birth, PEP statue, Photographic ID including passport or driving license, other form of identification, PPS number, details of transactions, AML or Fraud reports	- There is a legal / regulatory obligation
Auditors & Compliance	To audit the activities of the Credit Union in line with regulation and best practice	All data	- There is a legal / regulatory obligation - Legitimate interest of CDCU*

4 Where you have provided consent

Where we are processing data based on your consent you may withdraw that consent at any time.

5 Who we share Personal Data with.

We take all reasonable measures to protect your personal information while it is in our possession, however, it may be transferred to others where there is a legitimate and lawful reason. This section lists the categories and types of organisations that we may transfer personal data to.

5.1 Operational

Individuals whom you name such as guarantors, nominees or partners, professional advisors, industry representation, current account service providers, referral partners such as insurance or investment companies upon your expression of interest, Insurers, accountants, auditors, payroll bureau and oversight authorities.

If you transfer money using SEPA payments, Intesa Sanpaolo Bank is a controller of your personal data and you can find their privacy notice at https://group.intesasanpaolo.com/en/ .

If you apply for or take a mortgage, you data will be transferred to CU Mortgage Services DAC and you can find their privacy notice https://creditunionmortgage.ie/.

5.2 Legal / Regulatory Requirements
Central Bank - Credit Union Regulator and anti money laundering regulator, Department of Finance, Revenue, Department of Social Protection, Revenue Commissioners, Financial services and pensions ombudsman, State anti-fraud/criminal investigation (An Gardaí, CAB), Central Credit Register, Irish League of Credit Unions, Credit Union Development Authority, Audit & Compliance, Solicitors and advisors representing the Credit Union, Banks.

5.3 Credit assessment, credit control, and loan in arrears or debt recovery
Guarantors, debt collection agencies or others legitimately involved in this process, a solicitor to effect a legal charge over an asset, a third party who has purchased debt, Irish credit organisations including the CCR (Central Credit Register).

5.4 Insurance,
ECCU Assurance DAC for the purpose of insurance relating to Credit Union products. s

5.5 Incapacity to act upon your account
Where you have an incapacity to act upon an account due to intellectual incapability the Board may access an account for the purpose of a transfer of money.

5.6 Information technology & support services
Your personal information may also be transferred to third party service providers who process information on the Credit Union's behalf, including providers of information technology, website hosting and management, data analysis, anti spam services, data back-up, security, e-mail and storage services. The Credit Unions principal operating system is provided by Progress.

6 International transfer
The Credit Union does not currently transfer personal data to any recipients outside of the EEA European Economic Area unless;
- members use online identity validation software,
- requested to do so by the subject or
- in the course to the recovery of a debt where connected parties are outside of the EEA.

In the event that a service provider to the Credit Union is international in nature, or sub processes with entities that are not within the EU, we will take steps to ensure that personal data is retained in the EU and that any further processing that may expose such data to international transfer is subject to the protections provided by a lawful basis of transfer.

7 Responsibility of Members and others who provide personal data to us
You warrant that personal information provided to us by you that relates to third parties (e.g. family, guarantors, nominees) for the administration and delivery of services being provided, or while engaging with us in any other way, has been obtained fairly and lawfully and that such information is accurate. You also warrant that third parties introduced by you are aware of the purpose for which their personal data is being used and that their privacy rights have been upheld.

8 Information relating to children and vulnerable persons
The processing of personal data relating to children receives special attention under Data Protection Regulation and we shall treat this information with particular care. The digital age of consent is 16 in Ireland. Information obtained about children shall comply with the requirement for parental consent and shall receive additional consideration while planning an operational process.

9 Special (Sensitive) Data
The Credit Union recognises special categories of data, specifically personal data revealing racial or ethnic origin, political opinion, religious of philosophical beliefs, trades union membership, genetic or biometric data, or a subject's health or sexual life. The processing of these categories of information shall typically require consent. We may also process Special data where there is a legal/regulatory obligation, there is a legitimate interest or where it is in the public interest.

Health data may be processed for the processing of an insurance or mortgage product. Such processing will not normally require your consent.

10 Nominations
Irish legislation enables the nomination of successors to a deceased member's property in their Credit Union account and provides for special treatment independent of the deceased persons estate. This is a unique facility available to Credit Unions and all members are entitled to nominate a successor(s). A Member's nomination together with a record of revocations (the revoking of a nomination) shall be retained confidentially by the Credit Union. Personal data relating to nominations will be retained for up to six years following the completion of the nomination process.

The Credit Union will request confirmation of a Nominees identity, relationship to the member, and payment details to administer a valid nomination payment following the death of a member. Nomination information may be transferred to advisors, auditors, administrative staff and with recognised oversight authorities for the administration of this facility and will always be bound by confidentiality obligations.

11 Confidentiality & security
Clonakilty & Dunmanway Credit Union have implemented generally accepted standards of technology and operational security to protect personal data from alteration, unauthorised disclosure or destruction, and from use for unauthorised purposes. Furthermore, we have taken measures to ensure that contracts with all third parties that provide technical and processing services include terms that specify appropriate technical and organisational security measures to prevent accidental, unauthorised or unlawful disclosure or processing of personal data.

12 Your Rights
Subjects have the right to:

1. Be informed if we have personal data relating to a subject, the categories of data and the purpose of processing
2. Where information is collected directly from the subject, to be informed of the controller and representative, the purpose and legal basis for processing, where we rely on our legitimate interest we will inform you of that interest, who we may transfer that personal data to, if the data is being transferred internationally, the retention duration or criteria for storage for personal data, the consequences of not providing the data
3. Where data was not provided by you, we will identify the source of that data together with data categories.
4. Be informed if a failure to provide the personal data will have any direct and material personal consequences
5. Access your personal data. Where the format is not reasonably understood, this shall be delivered in an intelligible format
6. Have inaccurate, incomplete or out-of-date personal data that we hold about you corrected, or deleted
7. Withdraw consent for your personal data to be processes - where it was obtained from you on the basis of consent.
8. Make a submission on any automated decisions making processes or profiling of you.
9. Transfer your data to another controller
10. Have your personal data excluded from certain categories of processing.
11. Lodge a complaint with the Data Protection Commissioner. Contact details for the DPC can be found at www.dataprotection.ie.

Please note
- There are some limitations to these rights.

- You can contact us to exercise these rights by e-mail at info@dergcreditunion.ie. We will ask for additional information to verify your identity prior to acting upon such requests.

13 Removal from mailing lists
You may unsubscribe from our mailing lists at any time by using the 'unsubscribe' button on marketing communications, or by contacting us at info@cdcreditunion.ie.

14 Reporting of Data Breaches
Where a data breach occurs that poses a risk to the subject it shall be reported to the Data Protection Commission. Where such a breach occurs and poses a high risk to you we will also inform you. All breaches will be managed in accordance with Irish law and the GDPR.

15 Profiling
We may profile personal data in certain instances. This is typically be in the context of applying for a loan, fulfilling our obligations under Anti Money Laundering legislation or for the purpose of marketing. Such processing shall not be fully automated and shall always be subject to the intervention of an officer of the Credit Union.

16 Data Retention
We retain personal data that you submit to us only for as long as is necessary and for the purposes for which it was obtained, or as required by law. We have detailed retention periods for which personal data shall be retained for particular purposes below. The Credit Union reserves the right to delete personal data prior to the conclusion of the retention period or where such retention is not absolutely necessary for the provision of service to a subject.

Storage of personal data -		
Purpose of processing	**Duration**	**Criteria for the storage of personal data**
Membership information	7 years	From closing of the account, or greater where regulation mandates.
Identity verification data	2 years	Upon expiry of use (and it has been replaced)
Loan application denied - application and supporting documents	1 year	From loan final denial.
Issued loan - supporting documents		2 years from the repayment of the loan, or, in conjunction with deletion of the loan file.
Loan related data (the agreement and transaction details)	7 years	From closing of the account, or greater where regulation mandates.
Death benefit	1 year	From closure of membership account
Loan protection insurance	1 year	From closure of a membership account
Employment/volunteer data		Generally for the duration of employment plus 7 years. Where categories of data have - regulatory limitations to possible liability, or - mandatory retention periods, We will retain for these periods plus one year.
Marketing data relating to non members	12 months	From the last communication
CCTV	1 month	From recording. Up to 6 years In the event of an incident where a material risk of a liability exists
Incidents or complaint reports	Permanent	
Small balance write-offs / Un-cashed Cheque details	Permanent	Mandatory requirement
Documentation relating to revenue		Stored as mandated by law plus 12 months
AML and Fraud prevention documentation		Stored as mandated by law plus 12 months

Records and explanation of transactions, and of the provision of service		As mandated by the CU Handbook published by the Central Bank plus 12 months
Notes; 1. Nothing in this section creates an obligation upon the Credit Union to retain personal data on behalf of a data subject.		

17 Cookies

While using our web site we use cookies – small text files – which are placed on your hard drives to provide a more intuitive website experience. Cookies are a typical part of operating procedure for most websites and most browsers permit users to opt-out of receiving them if the user would prefer.

You can opt out of the use of certain categories of cookies on the cookie notice tool that is always visible while you use the CDCU website. This may reduce some of the functionality of the site.

Cookies can also be deleted by you from your browser at any time.

18 Updates

This notice may be updated to comply with precedent or to provide further clarification. The most up to date version is available in all branches. We advise you to use a current version of this document when considering your rights.