Privacy Notice of Tipperary Credit Union Limited – General

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. 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 with us.

Our contact details are:

Address: Tipperary Credit Union, Emmet Street, Tipperary
Phone: 062 80400
Email info@tipperarycu.ie

Data Protection Officer Details
Email: dpo@tipperarycu.ie

Tipperary 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.

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

- Your name, previous name, address, date of birth, personal and work email addresses, personal and work telephone numbers, financial data such as status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, source of wealth, source of funds, Politically Exposed Status, beneficial ownership status, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, driver license details, residency, tax residency, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings, online identifiers (i.e. cookies identifiers, Facebook Profile and Twitter Handle). Use of AIS (Account Information Systems) - Open Banking and a loan decisioning system to access loan applications.
- Additional Information required for home loans as follows: Valuation Reports, Land Registry folio, Certificate of Title, Life Assurance cover documents – these documents contain the following information – Name, Address, date of birth, property value, members solicitors name, address and contact details and medical data.

We need all the categories of information in the list above to allow us to; identify you, contact you, comply with our legal obligations and to perform our contract of providing financial services to you.

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 obligations under the Credit Union's Standard Rules.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligations for example anti-money laundering and beneficial ownership reporting obligations.
- 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 Irish Credit Bureau and the Central Credit Register.
- Administering the loan, including where necessary, to take 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 services by way of directly 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)

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.

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 right[1]. 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 loans assessment and anti-money laundering purposes and compliance with our legal duties in that regard. We also carry out profiling to tailor our marketing to you by e-mail, on -line, SMS and postal communication. Prior consent will be obtained.

Automated decision making.

We use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your organisation. When you apply for a loan, we use data from different sources to look at your ability to repay the loan. We also use information provided by you and information from the Central Credit Register. The information we process for automated

[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.

lending decisions includes income, financial statements, transaction history, salary, spending and bills, credit rating, other loans held by you. 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 consideration 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. This information is documented in our Retention Policy. A copy of our data retention schedule is available on request.

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

- A**ccounting** 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.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one year.
- **Telephone recording –** one year
- Credit agreements are **contracts** and as such the credit union retains them for seven years from date of expiration or breach, 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.
- Application forms as part of our youth activities we retain for five years. Consent relating to photographic images will be retained for as long as the photographic image has been used.

Planned data transmission to third countries

Data Transfers to UK

Data may be transferred from us to the UK which is a third country. The data is transferred based on an adequacy regulation by the EU in respect of the UK.

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 third parties to undertake operational functions on our behalf. 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.

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 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

For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), the Credit Union is a participant of PAYAC SERVICES CLG ("PAYAC"). PAYAC is a credit union owned; shared services company that provides electronic payment services for the credit union movement in Ireland. PAYAC is an outsourced model engaging third party companies to assist with the processing of payment data. For more information on PAYAC's privacy policy see the following link: https://payac.ie/privacy-policy/

Debit Card: If we issue you a debit card, Transact Payments Malta Ltd (which is an authorized 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 here: http://currentaccount.ie/files/tpl-privacy-policy.pdf.

Electronic Payments not through PAYAC: If you use our electronic payment services to transfer money into or out of your credit union account or make payments though your debit card into your credit union account, we are required to share your data with our electronic payment service provider AIB Merchant Services

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, 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 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.

Home Loans: To perfect security on our Home Loans, we employ the services of a local solicitor

To attain accurate and up to date valuations on properties for which home loans may be sanctioned and to ensure prudent lending practice, we will use local professional valuers to value such properties.

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 because 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. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013. 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, Beneficial Ownership Register, the Financial Services and Pensions Ombudsman Bureau of Ireland, and the appropriate Supervisory Authority if required under law.

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 Criminal Justice (Money Laundering and Terrorist Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives). This will include filing reports on the Beneficial Ownership Register, the Beneficial Ownership Register for Certain Financial Vehicles ("CFV"), on the Bank Account Register, the European Union Cross-Border Payments Reporting ("CESOP"), the Central Register of Beneficial Ownership of Trusts ("CRBOT") and the Ireland Safe Deposit Box and Bank Account Register (ISBAR). This reporting obligations requires the credit union to submit certain member data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. For further information, please contact the credit union directly.

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.

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 and guarantor 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 process your personal data to register this charge or have this charge registered on our behalf.

Connected/Related Party Borrowers: We are obliged further to Central Bank Regulations to identify where borrowers are connected 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:
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 the Central Credit Registrar [See legal duty].

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 to determine your suitability for the loan applied for.

Debt Collection: Where you breach the loan agreement we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they contact you and details of the indebtedness in order that they recover the outstanding sums	Our legitimate interest: The credit union, where appropriate will necessarily take steps to recover a debt to protect the assets and equity of the credit union
Judgements Searches: We carry out searches in Stubbs Gazette 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 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, public safety and the prevention and detection of fraud	Our legitimate interest: About the nature of our business, it is necessary to secure the premises, property herein and any staff /volunteers/members or visitors 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 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 resolves 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 Irish League of Credit Unions and/ specialist market research companies.

You have a right to notify us free of charge at any time that you wish to refuse such marketing by writing to us at our address at the top of this document or by using the "opt out" options in any marketing message we send you.
Please contact us directly if you wish to withdraw your consent.

Art Competition: This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information. Where the person is below 16* then we ask that the parent/legal guardian to 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 School's 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. Where the person is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms.

Youth Activities: This Credit Union offers a Transition Year Bursary Award and Student Scholarship. 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. Any personal data collected by us as part of this application/activity will be held for a maximum of 60 months from the date they were obtained. Consent relating to photographic images will be retained for as long as the photographic image is being used.

Cookies Usage : Tipperary Credit Union uses cookies to collect information about visitors' use of the website, including things like connection speed, operating system details, the time and duration visits and IP addresses. The information collected by cookies enables Tipperary Credit Union to understand the use of its site, including the number of visitors it has, the pages viewed per session, time exposed to pages etc. This in turn helps to provide visitors with a better experience. Tipperary Credit Union will not attempt to personally identify visitors from their IP addresses.

Please refer to our website for our full cookies policy at www.tipperarycu.ie

Your Rights in connection with your personal data are to:

To find out whether we hold any of your personal data and **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.

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 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 with us.*

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

Telephone **+353 (0)57 8684800** **+353 (01)765 0100** **Lo Call Number** **1 800 437 737** **Web Form:** **https://www.dataprotection.ie/en/contact/how-contact-us**	**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.

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 dpo@tripperarycu.ie 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 always meet your expectations. 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 by telephone on 062 80400 or calling to our main office at Emmet Street, Tipperary. If you wish to contact any of our sub offices details of these office opening times can be found on our website www.tipperarycu.ie