

## This Data Protection Notice is effective from Friday 25<sup>th</sup> May 2018.

Kilrush Credit Union Ltd. takes the privacy of our members' personal data very seriously. From Friday May 25<sup>th</sup> 2018, all European citizens will see the most significant change in relation to the processing of personal information in almost 30 years. The new General Data Protection Regulation (GDPR) will give citizens greater control over how their personal information is used and organisations will have more responsibility to demonstrate "accountability" about how they process personal information.

Where Kilrush Credit Union Ltd. mentions "we," "us," or "our" in this privacy notice, we are referring to Kilrush Credit Union Ltd. and its sub-offices in Quilty and Mullagh.

### Data Protection Officer

Kilrush Credit Union Ltd. appreciate the trust that you place in us to ensure that your personal information is kept safe. To oversee how we collect, use, share and protect your personal information and to ensure your rights are fulfilled, we have appointed a Data Protection Administrator. If you want to exercise any of your rights under the new GDPR, you may contact our Data Protection Administrator by:

Phone: 065 9051242

E-mail: [dpo@kilrushcreditunion.ie](mailto:dpo@kilrushcreditunion.ie)

In person or writing: Data Protection Administrator  
Kilrush Credit Union Ltd.  
Credit Union House  
Market Square  
Kilrush  
Co Clare

### How we collect your personal information

We collect personal information from you, when you open a member account with us, when you make an application for a loan, or when you request access to use our mobile app; (based on contracts for legal purposes). For security reasons, we record CCTV footage. For quality, training, and verification purposes, we record telephone conversations. Our website uses 'cookie' technology. A cookie is a little piece of text that our server places on your device when you visit our webpages, app, or social media pages. These cookies help us make these services work better for you. You may decide to disable cookies on your device and you can do that in your browser settings.

You may find out more about cookies at

[www.allaboutcookies.org](http://www.allaboutcookies.org)

### How we keep your information safe

We use technical and organisational measures to protect your information from unauthorised access. These security measures include encryption of your personal information, firewalls, 24/7 intrusion detection and authorised access only, to areas where your physical documentation is stored. When you contact us to ask about your information, we will ask you to identify yourself. Usually this achieved by asking you security questions where you contact us by phone.

### How long we keep your information

How long we hold your information depends on our initial purpose for collecting that information. We retain information for as long as we are obliged to keep it in order to meet our legal and regulatory obligations, this practice is in line with our Data Retention policy. We hold your information while you are a member and for a period of six years after account closure. We hold loan details for the lifetime of the loan and for a period of six years after the loan has been cleared. When we are no longer required to keep your information, it is deleted from our IT systems and hard copies destroyed. Where it is a physical document, we have it destroyed and receive a certificate of destruction.

### Meeting our legal and regulatory obligations

To assist Kilrush Credit Union Ltd in meeting our legal and regulatory obligations we collect relevant personal information from you. We may also rely on information from third parties that enable us to meet these obligations such as, the Irish Credit Bureau "ICB" when you make an application for a loan with us. Where you do not wish to provide your personal information to us, this may limit the products or services we can provide. For us to use your information lawfully we rely on one or more the following lawful basis:

- **Consent** – we rely on your consent where we are providing marketing information to you.
- **Performance of a contract** – this will be the basis of most of our interactions with you.
- **Legal Obligations** – Kilrush Credit Union is legally obliged to supply certain information to our Auditors (Grant Thornton) and our regulators (The Central Bank of Ireland, CCR, ILCU and ECCU).
- **Protecting the vital interests** - of yourself or others
- **In the interest of the public** or
- **Legitimate interests** – we may rely on legitimate interests in the normal business operation of Kilrush Credit Union Ltd.

### Consent

We need to ensure we have your consent in order to use your personal information for marketing purposes. (Where we want to contact you regarding our loan rates or any other service we provide and occasionally in order to share news about your Credit Union with you). You can change your mind about receiving marketing at any time ("opt-in" or "opt-out"). You can let us know if you change your mind when you call in to the offices, in writing, or by phoning or emailing us.

### How we use your personal information

In order for Kilrush Credit Union Ltd. to provide, our members with our products and services under the terms and conditions we agree between us we need to collect and use personal information about you. If you do decide, you do not want us to process your personal information this will limit the type of service we can provide to you.

### Your information and third parties

Sometimes Kilrush Credit Union needs to share your information with trusted third parties who share the same data protection obligations as ourselves. Some examples are:

- Auditors (Grant Thornton), Legal advisors (Pierse and Fitzgibbon) and other professional advisors
- Other legal or regulatory bodies (Central Bank of Ireland, ILCU, ECCU and CCR)
- Personal Information, which may be requested by a law enforcement authority in the carrying out of an investigation

In these cases, we will always have legal agreements in place to protect your personal information. In the case of a request from a law enforcement agent, we require the request in made in writing to our CEO.

### Under GDPR, you now have the following rights

When we process your personal information in relation to your membership of Kilrush Credit Union Ltd., you are entitled to rely on the following rights. These rights allow you to exercise control over the processing of your personal information. We can help you to exercise those rights by facilitating:

- **Access** – you may request access to your information and we can provide you with a copy of the information that we hold about you, in most cases this will be free of charge.
- **Correction** – you can ask us to correct your personal information at any time where you believe the information we hold about you is inaccurate or out of date.
- **Withdrawing consent** – you are entitled to change your mind at any time in relation to marketing.
- **Restricting or Objecting** – you have the right to restrict or object to our processing your personal information in certain circumstances; you can contact us to discuss these at any time.
- **Deleting** – you have the right to ask us to delete your personal information in some circumstances.
- **Portability** – Under GDPR, you now have the right to request that we transfer the personal information that you have provided to us to another service provider on your behalf, in electronic form.

### How to exercise your rights

From May 25<sup>th</sup> 2018, you may exercise any of the rights free of charge and you can do this by contacting us:

Phone: 065 9051242

Email: [dpo@kilrushcreditunion.ie](mailto:dpo@kilrushcreditunion.ie)

Post or in person: Kilrush Credit Union Ltd  
Credit Union House  
Market Square  
Kilrush  
Co Clare

When you contact us to make any of the above requests we will need to verify your identity, we do this to keep your personal information safe. Once we are satisfied that we have verified your identity, we aim to respond to your request within one month (30 calendar days) as set out in the GDPR. Where you request that we correct your personal information we will do so within 10 calendar days of receipt of your request. In exceptional circumstances, there may be an extension on the

above timeframes, where this is the case we will notify you of the delay and keep you up to date on its progress.

### International transfers of data

Kilrush Credit Union Ltd. does not transfer your data to third countries outside of the E.U.

### Making a complaint

If you wish to make a complaint about the way in which we are using your personal information, please let us know as soon as possible so that we can make the corrections for you. If you wish to make a complaint, you may do so in writing or by email. We will investigate all complaints received and aim to resolve them as quickly as possible. We ask that you supply as much information as possible including identification, to help us in resolving the matter quickly.

You may also lodge a complaint with the Data Protection Commissioner in Ireland their details are:

Data Protection Commission  
Canal House  
Station Road  
Portarlinton  
Co Laois  
R32 AP23

Phone: 057 868 4800

076 1104 800

Fax: 057 868 4757

Web: [www.dataprotection.ie](http://www.dataprotection.ie)

Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)

### Updates to our Privacy Notice

We will keep this notice under review and will make changes from time to time. We will notify you by posting on our website, displaying the notice on our TV monitor in the Kilrush office or by other appropriate means where we have made updates to this privacy Notice.

You can view the most up to date version of this notice on our website [www.kilrushcreditunion.ie/privacynotice](http://www.kilrushcreditunion.ie/privacynotice)