

## Data Protection Notice

### 1. About this Notice

Savvi Credit Union Ltd “Savvi” recognises that protecting Personal Data, including special categories of data (sometimes referred to as sensitive Personal Data), is very important to you. We have published this document to clearly outline, in a transparent way, how we will collect, use, store, protect and retain your Personal Data.

### 2. Who we are

Savvi 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 solely for the purpose of carrying out the abovementioned objectives.

### 3. Risk & Compliance Officer

You may contact our Risk & Compliance Officer about all issues related to this policy, your personal data and to exercise your rights under Data Protection laws.

Risk & Compliance Officer, Savvi Credit Union Ltd., 27-18 Herbert Place, Dublin 2. Tel. 01 6325130 Email: [steve.wall@savvi.ie](mailto:steve.wall@savvi.ie)

### 4. Personal Data We Collect

The personal data we hold about you can vary depending on the products and services you use e.g. when you open a share account or apply for a loan.

We may collect, store and use the following category of personal information:

Your name, address, date of birth, email, telephone financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, property details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings.

In addition, our website uses “cookie” technology. This is to help our website work better for you. For more information on our cookie policy, please see our Privacy Statement for Online Media and Mobile Banking on our website [savvi.ie](http://savvi.ie).

## 5. Purpose of the Collection of 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 to you under the Credit Union's Standard Rules
- To contact you in respect of your account and any product or service you avail of; and
- To comply with our legal obligations, for example anti-money laundering, to identify connected borrower
- Assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- The purchase of loan protection and life savings protection
- 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.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union.
- 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.

We may also collect, store and use "special categories" of more sensitive personal information including 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, contact you, comply with our legal obligations 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.

## 6. 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:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policy.
- 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.

#### 7. 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. 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.

#### 8. If you fail to provide personal information

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.

#### 9. 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 information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### 10. 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 purposes and compliance with our legal duties in those regards.

#### 11. 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. We do not hold personal information for longer than is necessary.

#### 12. International transfers of data


We do not transfer personal data outside of the European Economic Area (EEA).

#### 13. 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 [savvi.ie](http://savvi.ie) or you can ask us for a copy.

#### 14. 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:

	<p><b>Fulfilling contract</b> This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you</p>
<p><b>Administrative Purposes:</b> 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 maintaining and administer any accounts you have with the credit union.</p>	
<p><b>Security:</b> 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.</p>	
<p><b>Third parties:</b> 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 do so with respect for the security of your data and will be protected in line with data protection law.</p>	
<p><b>Guarantors:</b> 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.</p>	
<p><b>Irish League of Credit Unions (ILCU) Affiliation:</b> 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.</p> <p>The Privacy Notice of ILCU can be found at <a href="http://www.creditunion.ie">www.creditunion.ie</a></p> <p><b>The ILCU Savings Protection Scheme (SPS):</b> 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.</p>	
<p><b>Insurance:</b> 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).</p> <p>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.</p>	
<p><b>Credit Assessment:</b> 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:</p> <ul style="list-style-type: none"> <li>• your application form or as part of your loan supporting documentation</li> <li>• your existing credit union file,</li> </ul>	

- 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: To help us improve our service to you, we may use information about your account to help us improve our services to you.

Electronic Payments: If you use our electronic payment services to transfer money into or out of your credit union account or make payments through your debit card into your credit union account, we are required to share your personal data with our electronic payment service provider BNP Paribas.



## Legal Duty

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

**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 information 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 if required by 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.

**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. In order 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.

**Purpose of the loan:** We are obliged to ensure that the purpose for 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.

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

**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 shortly] 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 in order 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 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*).

**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.

ICB are using **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.

Please review ICB's Fair Processing Notice which is available at <http://www.icb.ie/pdf/Fair Processing Notice.pdf>. It documents who they are, what they do, details of their Data Protection Officer, how they get the data, why they take it, what personal data they hold, what they do with it, how long they retain it, who they share it with, what entitles them to process the data (legitimate interests), what happens if your data is inaccurate and your rights i.e. right to information, right of access, right to complain, right to object, right to restrict, right to request erasure and

right to request correction of your personal data.

**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 make contact with you and details of the indebtedness in order that they recover the outstanding sums.

**Our legitimate interest:** The credit union, where appropriate will necessary 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 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 scoring information 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.

**Our legitimate interest:** With regard to 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.

**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 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 processing which is based on 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/or specialist market research companies.








## Your Marketing Preferences

As part of improving our service to you, from time to time, we would like to inform you of goods, services, competitions and/or promotional offers available from us. We may wish to use different means when sending such marketing communications.

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 should you wish to change or withdraw your consent.

## 15. Your Data Protection Rights

Your Rights	
The following are your rights in connection with your personal data.	
	<b>To find out</b> whether we hold any of your personal data <b>and if we do to request access</b> to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.
	<b>Request correction</b> of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
	<b>Request erasure</b> 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).
	<b>Object to processing</b> 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.
	<b>Request the restriction of processing</b> 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 <b>you have a right to withdraw that consent at any time and free of charge.</b>
	Request that we: a) <b>provide you with a copy of any relevant personal data in a reusable format;</b> or b) <b>request that we transfer your relevant personal data to another controller</b> where it's technically feasible to do so. <i>Relevant personal data</i> 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 in respect of any processing of your data at		
<b>Post</b>	<b>Telephone</b>	<b>E-mail</b>
Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois	+353 (0)57 868 4800 +353 (0)761 104 800 1890 252 231	info@dataprotection.ie

**Please note that the above rights are not always absolute and there may be some limitations**

## 16. Exercising your rights with us

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 our Risk & Compliance Officer in writing using their contact details on page 1 of this document.

**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 straight away if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us using our contact details on Page 1 of this document.