

ANSAC CREDIT UNION

GENERAL DATA PROTECTION STATEMENT

Effective Date: 29/06/2020

In this Data Protection Statement you will find the following information laid out in sections to make it easier to find the information you want.

At the end of the main document you will also find information that is specific to the services you interact with so that you can read information that is relevant to that specific service.

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1. ABOUT OUR CREDIT UNION

We provide general information about the Credit Union and our contact details.

Credit Union:	ANSAC CREDIT UNION
Address:	75/76 Amiens Street, Dublin 1
Website:	www.ansaccu.ie
Email:	DPO@ansaccu.ie
Phone:	01 8554489

ANSAC Credit Union Ltd. is a co-operative based financial institution, owned by our members who save and borrow with us. Our operating principles are founded on our core values of cooperation, equality and mutual self-help.

Credit Unions must have a common bond that is either professional or geographic. In the case of ANSAC, it is membership of PDFORRA. The family of ANSAC members, including minors, can also join. Adult family members must live at the same address as the ANSAC Member. This however is not a requirement in the case of children of ANSAC Members.

We provide a safe place for members' savings (shares) and deposits and offer a full suite of loans as well as providing services such as online banking, funds transfer services that enable our members to transact on their savings(share), loans and budget accounts.

In order to provide our services, we need to process Personal Data. We are committed to protecting the rights and data protection of individuals in accordance with data protection legislation including the General Data Protection Regulation in Europe (the "GDPR").

2. THE PURPOSE AND STRUCTURE OF OUR DATA PROTECTION STATEMENT

This section sets out the basis on which any Personal Data we collect from you, or that you provide to us, will be used by us.

Please read this Data Protection Statement carefully to understand our views and practices regarding the Personal Data we collect and how we will treat it.

We have used a layered approach to try to ensure you can find the information that you need about our processing activities. Our Data Protection Statement is structured as follows:

Data Protection Statement	Details
Summary Data Protection Statement	provides summary information about the processing activities of the Credit Union
General Data Protection Statement	provides general data protection related information
Services Data Protection Statement(s) including <ul style="list-style-type: none">- Member Accounts- Loan Accounts- Website Users- Online Banking- Online Loans	provides further information about particular services and processing activities of the Credit Union. These service data protection statements are included at the end of our General Data Protection Statement and will be provided when relevant to your interaction with us.

3. WHO OUR DATA PROTECTION STATEMENT APPLIES TO

This section provides information relating to the data subjects whose Personal Data we process.

This Data Protection Statement provides specific information relating to the following data subjects whose Personal Data we process:

1. Credit Union members;
2. individuals who may become members of the Credit Union;
3. individuals who are party to or connected with any of the services we offer our members such as beneficiaries, guarantors, relations or representatives of one of our members;
4. business contact details including those of our suppliers and partners;
5. members of the public and non-members who pass by and/or visit the Credit Union and whose images are captured on CCTV;
6. users/visitors of our Website; and
7. prospective employees of the Credit Union.

Personal Data of employees and certain individuals serving as board members and volunteers of the Credit Union is dealt with in a separate internal data protection notice.

4. CATEGORIES OF PERSONAL DATA

This section provides information relating to the categories of Personal Data we process.

We may collect, store, and use the following categories of Personal Data about you:

Identification Data

This includes name, marital status, title, data of birth, gender, PPSN, photographs, job title and employer. It also includes background and verification data such as a copy of passports, driver's license or utility bills as well as other information we require to comply with our obligations under anti-money laundering legislation.

Contact Data

This includes email address, phone number, postal address, billing address.

Registration Data

This includes username and password as well as mobile phone number and security questions which are used to create and manage user accounts for secure access to our online services.

Member Financial Data

This includes financial data such as your account status and history, transaction data, contract data, credit checks, details of the Credit Union products being used. This also includes payment related information or bank account details and financial data received as part of the services that we offer. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, mortgage details, other loans and debts, previous addresses, spouse, partners and we may request further information to support the purpose for the loan.

Correspondence Data

If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence.

Marketing Data

This includes your preferences in receiving marketing from us and your correspondence preferences.

CCTV Data

We operate CCTV cameras at the Credit Union. If you pass by and/or visit any of the Credit Union premises, your image may be recorded on CCTV.

Recruitment Data

If we interact with you for the purposes of any job with the Credit Union, we will collect recruitment related data such as identification data, CV data and application data as part of the recruitment process.

When processing CV data, we may process certain Personal Data including the following: date of birth, employment history, skills/ experience, languages, educational history, qualifications, membership of professional associations, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations.

As part of processing Recruitment Data, we process interview/screening answers.

Web Data

When you interact with us online we will automatically collect data about your use of our services, including data on the type of device you're using, its IP address, operating system, referral source,

length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of Website use. Where possible, this information is collected at an aggregate level and your identity data is not stored as part of this technical data. Web Data includes cookies and web beacons. Further information about how we use cookies is included in our cookie notice <https://www.ansaccu.ie/cookies.asp>.

Log Data

Log data includes logfiles of online interactions with our services such as online banking, online loan and member application forms. Log data is collected primarily to manage the security of our services and to enable us to investigate incidents and user reported issues.

Social Media Data

Social media data is collected when you interact with our social media channels through shares, likes, comments, mentions, follows, impressions or clicks on content.

Special Categories of Personal Data

When we provide our services, we may process special categories of Personal Data. Under the GDPR special category Personal Data includes Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The special category Personal Data that may be processed by the Credit Union include:

Health Data

When you are taking out a loan the Credit Union may ask you to make a health declaration in order to obtain insurance cover for the loan. While loan Insurance is free to members, it is a requirement of our loan terms that our members take out insurance on unsecured loans.

We process this information with your explicit consent.

Other Special Category Data

Special categories of data relating to political opinions, religious or philosophical beliefs, or trade union membership, or data concerning a natural person's sex life or sexual orientation may be inferred from information you provide such as when you make payments to a religious or political organisation. Such information is incidental to the purposes of processing and we do not further process this information for any other purpose.

From time to time members may provide special category data to us to support a loan application. For instance, members may be applying for a loan to finance a medical procedure and may furnish information relating to the procedure. While we may ask generally for information to support a loan application, we never ask for medical information or other special category data in these circumstances. It is our policy if it is provided to us to return such information to the member.

5. OUR LEGAL BASIS

We have set out here the legal basis we use to process Personal Data.

All processing of Personal Data must be lawful. Processing will only be lawful if we have a legal basis for processing.

Contract

We will process Personal Data where necessary to perform our obligations relating to or in accordance with the terms and conditions of any contract you enter into with the Credit Union (such

as the membership agreement or loan agreement) or to take steps at your request prior to entering into such agreement.

Legal Obligation

We will need to process certain Personal Data in order to comply with any legal or regulatory obligations imposed on us, such as to comply with legal obligations connected with “know your customer” requirements under anti-money laundering (AML) laws, or under anti-money counter terrorist financing law. We may also process Personal Data in certain circumstances where it is necessary to safeguard the prevention, investigation and detection of Payment Fraud under the European Union (Payment services) Regulations 2018.

Consent

For certain processing activities we may rely on your consent. For example, a Member may give us consent to receive our newsletter.

Where we are unable to collect consent for a particular processing activity, we will only process the Personal Data if we have another lawful basis for doing so.

You can withdraw consent provided by you at any time by unsubscribing to marketing communications or by contacting us at DPO@ansaccu.ie

Legitimate Interest

At times we will need to process your Personal Data to pursue our legitimate business interests, for example for administrative purposes, to collect debts owing to us, to make legal claims, to provide information to you, to operate, evaluate, maintain, develop and improve our Websites and services or to maintain their security and protect intellectual property rights.

We will not process your Personal Data on a legitimate interest basis where the impact of the processing on your interests and rights outweigh our legitimate interests.

If do not want us to process your Personal Data on the basis of our legitimate interests, contact us at DPO@ansaccu.ie and we will review our processing activities.

6. OUR PROCESSING ACTIVITIES

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

We use Personal Data to provide you with our services and to assist us in the operation of the Credit Union. Under data protection law, we must ensure that the purpose of processing is clear.

Purpose of Processing	Categories of Personal Data	Lawful Basis
Member Application and account set-up and administration Please see our Member Accounts Data Protection Statement for further information	<ul style="list-style-type: none">• Identification Data• Contact Data• Correspondence Data• Financial Data• Log Data	<ul style="list-style-type: none">• Contract• Legal Obligation• Consent• Legitimate Interest
Loan application and approval, loan administration and debt collection	<ul style="list-style-type: none">• Identification Data• Contact Data	<ul style="list-style-type: none">• Contract• Legal Obligation

Purpose of Processing	Categories of Personal Data	Lawful Basis
Please see our Loan Data Protection Statement for further information	<ul style="list-style-type: none"> • Correspondence Data • Financial Data • Health Data • Log Data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent
Online banking services Please see our Online Banking Data Protection Statement for further information	<ul style="list-style-type: none"> • Registration Data • Identification Data • Contact Data • Correspondence Data • Financial Data • Log Data 	<ul style="list-style-type: none"> • Contract • Legal Obligation • Consent • Legitimate Interest
Budgeting services to provide budget accounts	<ul style="list-style-type: none"> • Identification Data • Contact Data • Correspondence Data • Financial Data 	<ul style="list-style-type: none"> • Contract • Legal Obligation • Consent
Member insurance Services	<ul style="list-style-type: none"> • Identification Data • Contact Data • Correspondence Data • Financial Data • Health information 	<ul style="list-style-type: none"> • Contract • Legal Obligation • Consent
Recruiting staff to the Credit Union including: <ul style="list-style-type: none"> • to contact you in connection with any job position we may have open • to check your suitability for the role • to fulfil the recruitment needs of the business. 	<ul style="list-style-type: none"> • Identification Data • Contact Data • Correspondence Data • Recruitment Data • Contact Data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent • Contract
To deliver our Website including: <ul style="list-style-type: none"> • to promote our products and services • to administer the Website • to ensure the safety and security of our Website and our services. Please see our Website User Data Protection Statement for further information	<ul style="list-style-type: none"> • Web Data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent
Marketing and promotion of our business including: <ul style="list-style-type: none"> • to send newsletters and other information that may be of interest • to contact you as part of our business relationship or for lead generation and general administration • to understand how effective our social media campaigns are • competitions and member draws 	<ul style="list-style-type: none"> • Contact Data • Correspondence Data • Identification Data • Social Media Data 	<ul style="list-style-type: none"> • Legitimate Interest • Consent

Purpose of Processing	Categories of Personal Data	Lawful Basis
Administration of our relationship including: <ul style="list-style-type: none"> to manage/respond to a complaint/appeal to keep you informed about the operation of the Credit Union to notify you of updates to this Data Protection Statement; 	<ul style="list-style-type: none"> Contact Data Correspondence Data Identification Data 	<ul style="list-style-type: none"> Legitimate Interest Legal Obligation
To meet our regulatory obligations: <ul style="list-style-type: none"> To comply with Central Bank reporting, compliance and auditing regulatory activities To comply with revenue reporting obligations To comply with <i>anti-money laundering (AML)</i> and the countering of the financing of <i>terrorism</i> (CFT) regulations. To ensure the prevention, investigation and detection of Payment Fraud under the (Payment services) Regulations 2018. 	<ul style="list-style-type: none"> Identification Data Correspondence Data Financial Data 	<ul style="list-style-type: none"> Legal Obligation
Prevention of fraud and ensuring security of the Credit Union	<ul style="list-style-type: none"> CCTV Data 	<ul style="list-style-type: none"> Legitimate Interest

7. SOURCES OF PERSONAL DATA

We have set out below the sources of Personal Data we collect.

We may obtain Personal Data from you directly or from a third party.

Credit Unions Members and their representatives

We may collect your Personal data directly from you when you:

- make an enquiry or apply for membership of the Credit Union;
- apply for a loan or act as guarantor on a loan;
- transact with us either in the Credit Union or via online banking;
- avail of any of our member services such as our bill payment or foreign exchange services;
- interact with us on behalf of a Credit Union member;
- participate in our member draws, competitions or other promotional events;
- pass-by or enter the Credit Union premises where CCTV is located;
- apply for a job or enquire about volunteering with us;
- enter a competition run by the Credit Union;
- market or provide your services to us;
- follow us on social media;
- when you visit our website or submit an inquiry via an online form.

Third Parties

we may collect your Personal Data from a 3rd party when we:

- conduct background checks, including “know your customer” checks;
- consult credit referencing agencies such as the Irish Credit Bureau and the Central Credit Register;
- are recruiting and you have provided your Personal Data to a recruitment agency for the purpose of sharing it with us.

Beneficiaries

In some cases, we are provided your Personal Data when a member nominates you as a beneficiary on their account.

8. DISCLOSURE OF PERSONAL DATA

We have set out below the parties to which we may disclose your Personal Data.

In certain circumstances, we may disclose Personal Data to third parties as follows:

- business partners and sub-contractors including, payment processors, data aggregators and hosting service providers;
- authorised officers or employees of the Irish League of Credit Unions (“**ILCU**”) for the purpose of the ILCU providing professional and business support services to the Credit Union and for the administration of the ILCU Savings Protection Scheme;
- ECCU Assurance DAC (“**ECCU**”) for the administration of insurance products and services offered to Credit Union members such as Life Savings and] Loan Protection.
- domestic and foreign tax authorities to establish your liability to tax in any jurisdiction;
- the regulator and the Central Bank of Ireland for reporting, compliance and auditing purposes;
- internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;
- our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website. This consists of aggregated anonymous information only and relates to the web pages visited on the Website and not the information included on those web pages;
- if our Credit Union is merged with another Credit Union or acquired by a third party, in which case Personal Data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply the terms of any agreement;
- to protect our rights, property, or safety, or that of you or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- as required by law, in order to meet the requirements of relevant legislation such as the Credit Union Act 1997. We will disclose your Personal Data if necessary, to:

- comply with a legal obligation;
- protect or defend our rights, interests or property or that of a third party;
- prevent or investigate possible wrongdoing in connection with our services;
- act in urgent circumstances to protect the personal safety of one or more individuals; and
- to protect against legal liability.

When we engage another organisation to perform services for us, we may provide them with information including Personal Data, in connection with their performance of those functions. We do not allow third parties to use Personal Data except for the purpose of providing these services.

9. SECURITY MEASURES

We will take all steps reasonably necessary to ensure that Personal Data is treated securely in accordance with this Data Protection Statement and the relevant law.

In particular, we have put in place appropriate physical, technical, and organisational procedures to safeguard and secure the Personal Data we process.

We will also take reasonable steps to verify your identity before granting access to information to protect and secure the Personal Data we process.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We also use secure connections to protect Personal Data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access services, you are responsible for keeping this password confidential. Please do not share your password with anyone.

If you think that there has been any loss or unauthorised access to Personal Data of any individual, please let us know immediately.

10. TRANSFERS OUTSIDE THE EEA

We will only transfer Personal Data outside the EEA if necessary and with appropriate safeguards in place.

We do not process any of your Financial Data outside the European Economic Area (EEA).

The Credit Union may transfer limited Personal Data to be processed outside the EEA by our processors. In such cases we use processors who provide sufficient guarantees to ensure the security and protection of your Personal Data.

11. RETENTION

We only keep your Personal Data as long as it is necessary for the purposes of processing it or to comply with legal or regulatory requirements.

We have identified our retention practices in the table below. In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our

legitimate business interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Purpose	Retention Period
Member Application and account set-up and administration	Account closure + 7 years
Loan application and approval, loan administration	Termination of loan + 7 years
Online banking services	Account closure + 7 years
Budgeting services	Account closure + 7 years
Member insurance Services	Account closure + 7 years
Current Account Services	Account closure + 7 years
Recruiting staff to the Credit Union	12 months for unsuccessful candidates
To deliver our Website	12 months or less
Marketing and promotion of our business	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe
Administration of our relationship	Account closure + 7 years for Correspondence Data
Meeting regulatory requirements	As required to meet relevant regulatory requirements
Prevention of fraud and ensuring security of the Credit Union	28 Days for CCTV Data

In certain cases, we may retain Personal Data for longer than specified here if required under relevant laws.

12.YOUR RIGHTS UNDER THE GDPR

You have rights under data protection law in relation to how the Credit Union uses your Personal Data. You may generally access your rights free of charge.

You can ask for access to the Personal Data we hold on you

You have the right to ask for all the Personal Data we have about you. When we receive a request from you in writing, we must give you access to all Personal Data we've recorded about you as well as details of the processing, the categories of Personal Data concerned and the recipients of the Personal Data.

We will provide the first copy of your Personal Data free of charge, but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your Personal Data in some limited cases including where this might adversely affect the rights and freedoms of others.

You can ask to change Personal Data you think is inaccurate

You should let us know if you disagree with something included in your Personal Data.

We may not always be able to change or remove that information, but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

You can ask to delete Personal Data (right to be forgotten)

In some circumstances you can ask for your Personal Data to be deleted, for example, where:

- your Personal Data is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your Personal Data (where there is no other lawful basis for us to use it)
- there is no lawful basis for the use of your Personal Data
- deleting the Personal Data is a legal requirement

Where your Personal Data has been shared with others, we will do what we can to make sure those using your Personal Data comply with your request for erasure.

Please note that we cannot delete your Personal Data where:

- we are required to have it by law
- it is used for freedom of expression
- it is used for public health purposes
- it is used for scientific or historical research or statistical purposes where deleting the Personal Data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

You can ask us to limit what we use your Personal Data for

You have the right to ask us to restrict what we use your Personal Data for where:

- you have identified inaccurate information, and have told us of it
- where we have no legal reason to use that Personal Data but you want us to restrict what we use it for rather than erase it altogether

When Personal Data is restricted it can't be used other than to securely store the Personal Data and with your consent to handle legal claims and protect others, or where it's for important public interests.

You can ask to have your Personal Data moved to another provider (data portability)

You have the right to ask for your Personal Data to be given back to you or for it to be provided to another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your Personal Data with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

You can make a complaint

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

13.COOKIES

Please see our separate cookie notice available at [\[INSERT LINK\]](#) for further information.

14.AMENDMENTS TO THIS DATA PROTECTION STATEMENT

We will post any changes on the Website and when doing so will change the effective date at the top of this Data Protection Statement. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services. If you are not happy with any changes that we have made please contact us.

In some cases, we may provide you with additional notice of changes to this Data Protection Statement, such as accompanying the annual member booklet. We will always provide you with any notice in advance of the changes taking effect where we consider the changes to be material.

15.OUR CONTACT INFORMATION

Please contact us if you have any questions about this Data Protection Statement or Personal Data we hold about you:

- by email at: DPO@ansaccu.ie or write to us at:
Data Protection Officer,
75/76 Amiens Street
Dublin 1

16.SUPERVISORY AUTHORITY

The Data Protection Commission in Ireland may be contacted using the contact details below if you have any concerns or questions about the processing of your Personal Data.

CONTACT DETAILS

Online Form: <https://forms.dataprotection.ie/contact>

Address: 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland

Tel: +353 578 684 800 or +353 761 104 800