

Synergy Credit Union Limited Privacy Statement



Credit Union Limited

where community matters

Our commitment to data privacy and information security

At Synergy Credit Union, we are fully committed to protecting and respecting our members' privacy. This statement sets out the basis on which any personal data we collect from and about you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

We are a Data Controller for the purposes of the Data Protection Acts 1988 and 2003 ("the Acts") and the General Data Protection Regulation ("the GDPR") which takes effect from 25th May 2018.

Personal data we collect

We collect personal information from you, for the following purposes:

- ▶ When you create a member account
- ▶ When you create a current account
- ▶ When you interact with us for the products and services we supply to you by virtue of your membership such as registration for on-line and mobile services, apply for a Visual Savings Card, apply for an ATM Card, debit card or overdraft
- ▶ We record telephone conversations to offer you additional security, resolve complaints and improve service standards
- ▶ We record through CCTV, footage to offer you additional security, resolve complaints and improve service standards
- ▶ When you apply for loan facilities
- ▶ Any instructions we accept from you or transactions we undertake to which you are a party, whether through our website, or otherwise (this information may be provided by others e.g. joint account applications, club or other account(s) to which you are a signatory, accounts to which you are a nominated beneficiary)



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How we use your personal data

The personal information we collect is for specified purposes and services we provide to you including:

- ▶ Administer the products and services we supply to you
- ▶ To implement any contracts we have entered into with you
- ▶ When assessing your loan application and determining your ability to meet the loan repayments.
- ▶ To contact you should you default on the terms of the credit agreement relating to any loan(s) to which you are party
- ▶ to conduct credit searches with credit reference agencies in order to provide credit facilities and, where necessary, for fraud prevention and debt recovery
- ▶ We may also use your information to notify you about changes to our services to which you have subscribed or to provide you with information about products or services that you request from us, or, where you have agreed to us doing so, which we feel may interest you

We use your personal information for the purpose it was collected. We do not use your personal information for any different purpose other than for what it was obtained for without notifying you and seeking your consent first.

Sharing your personal data

We will only share your information with Credit Union authorised third parties for specific purposes related to the services we are offering you. We do not allow third parties to use your personal information for any other purposes.

If we issue you a debit card, Transact Payments Limited (which is an authorised 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 at

<http://currentaccount.ie/files/tpl-privacy-policy.pdf>

We may have to share your personal data as required with regulatory authorities or with law enforcement agencies.

We may also share your information with your authorised representatives or other third parties where you have authorised us to do so such as budgeting and advice agencies, receivers, liquidators and official assignees (as applicable).

We may use other companies and individuals to work on our behalf or to review information in order to help us to make decisions for the benefit of the Credit Union and its members. This may include debt collection, IT processing, insurance providers and credit agencies. We have agreements in place with all third parties to whom we give your information, for the purposes of handling your data, in accordance with requirements of the GDPR.

The legal basis for retaining and/or processing your personal data

We use and share your information where:

- ▶ You have provided us with explicit consent to use that information in a specific way (you have the right to withdraw your consent at any time. See 'Your Rights' section below)
- ▶ It is required for us to provide a service to you or in the completion of a contract you have entered into with us. This may also arise in the context of when we are responding to a request from you, so that you can enter into a contract with us (e.g. a loan offer)
- ▶ We are required to do so to comply with a legal obligation (e.g. the performance of a contract, to comply with the requirements of the Criminal Justice legislation & regulation in respect of anti-money laundering/the combating of the financing of terrorism/UN financial sanctions, reporting credit information to the Central Credit Register, reporting to the regulatory authorities and law enforcement)
- ▶ Its use is required to protect your "vital interests" in exceptional circumstances
- ▶ Its use is required for our legitimate interests (which you may object to) in the course of managing our business including credit risk management, providing service information, conducting marketing activities, training and quality assurance, strategic planning and the purchase or sale of assets.

Keeping your personal data Secure

We employ physical, technical and administrative safeguards to protect the confidentiality and security of your personal information. We use industry standard procedures to protect your information from loss, misuse or unauthorised access.

Appropriate technical and organisational measures are taken to protect your data.

Use of our on-line account access (www.synergycu.ie)

We at Synergy Credit Union take our data protection responsibilities very seriously. All information you provide to us through this website is stored on secure servers. We employ appropriate physical and technical security measures including staff training and awareness, to prevent unauthorised access to, alteration or destruction of your personal data in our possession and we will review these measures regularly.

You must keep your PIN, Password and Username, and any other security device we give you, safe and secure. We will never initiate a request for this information.

You should log off your online account when finished using it.

The use of the internet, by its nature, is not always secure. As a result, while we have reasonable IT security measures in place, we cannot guarantee the security or privacy of communications made over the internet.

Marketing

We may contact you by mail, email and text about our services and other events involving or relating to products and services which may be of interest to you. You have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right, you can unsubscribe or opt out at any time when you receive an email/ text or you can contact us at dpo@synergycu.ie.

Cookies

Synergy Credit Union uses Cookies on our website. Please refer to our Cookies policy which is available on our website.

Your Rights

You have certain legal rights to control your information and the manner in which we process it. This includes:

- ▶ A right to get access to your personal information
- ▶ A right to request us to correct inaccurate information, or update incomplete information
- ▶ A right to request that we restrict the processing of your information in certain circumstances
- ▶ A right to receive the personal information you provided to us in a portable format
- ▶ A right to object to us processing your personal information in certain circumstances (for example if you believe we are not using your information in a lawful manner, or for the purposes for which it was provided)
- ▶ Where we have requested your permission to process your information, a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities
- ▶ A right to object to us processing your information for direct marketing purposes, including profiling you for the purposes of marketing

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.

Implications of not providing information

Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

How long we hold your personal data

Our retention periods are subject to legislation and regulatory rules set by authorities such as the

Central Bank of Ireland and the type of financial product provided to you.

What if I am 15 years of age or under?

We are concerned to protect the privacy of members aged 15 years or under. If you are aged 15 years or under, your parent's (guardian's) permission will be required before you provide us with personal information.

Updates to our privacy notice and policy

We keep this Privacy Statement under regular review. This statement was last updated in March 2020.

How to contact us

If you have any questions, concerns or suggestions related to our Privacy Statement or our Online Access Privacy Policy, you can contact us using the below details.

- ▶ **Online:**
www.synergycu.ie
- ▶ **Contact details:**
Email: dpo@synergycu.ie
Freephone 1800 272927
- ▶ **Registered Office**
Synergy Credit Union Limited
Credit Union House
27/29 Patrick Street
Fermoy
Co Cork

Synergy Credit Union Limited is regulated by the Central Bank of Ireland.