



Account Opening Privacy Notice of Cois Sionna Desmond Credit Union Limited

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 solely for the purpose of carrying out 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. If you apply for a loan with us, you will be provided with our Lending Privacy Notice to take account of further processing that may be necessary.

Our contact details are:

Address: Church Street, Askeaton, Co. Limerick
Website: www.csdcu.ie
Email: memberservices@csdcu.ie
Phone: 061-392237

The Data Protection Officer for Cois Sionna Desmond Credit Union Ltd can be contacted on 061-392237 or by email at dpo@csdcu.ie or at the above address.

Cois Sionna Desmond Credit Union Limited is committed to protecting the privacy and security of your personal information. 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, address, date of birth, gender, email, telephone number (s), financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, employment status, source of wealth, source of funds, Politically Exposed Status, accommodation status, mortgage details, previous addresses, spouse details, partner details, dependents, nomination details, Tax Identification/PPSN numbers, passport details, driver licence details, tax residency, bank account details, interactions with credit union staff and officers on the premises, by phone, email, current or past complaints, CCTV footage, information about you provided by others e.g. joint account applications/nominations, call recording (where applicable)

For a **CAS account** the following categories of personal data we collect, store and use:

- Eircode, details on source of wealth and funds, further information on income, suitable contact time, birth country, account usage, current banking 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.

Purpose for which we process your personal data when you first join the credit union;

- 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;

Purpose of processing your information for maintaining an account with you;

- Processing lodgments and withdrawals via cash, cheque, debit card, electronic transfers, standing orders and pay deductions;
- Buying and selling foreign currencies;
- Updating your account to ensure data accuracy;
- Providing you with access to your account online;
- Posting obligatory notices such as your annual account statement;
- Meeting our regulatory obligations in relation to anti-money laundering, tax reporting, related parties and connected borrowers;
- CCTV for your safety and the safety of our staff and volunteers and to prevent fraud;
- Complaints handling;
- Process data protection rights requests
- Call recording for verification purposes;
- To open and maintain a CAS account for you;

Automated decision making

The credit union does not use any form of automated decision making at this time. This means that no decision is made about you based solely on automated processing with no human interaction.

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, anti-money laundering purposes and compliance with our legal duties in that regard.

Marketing

In the event that we would like to send you direct marketing, we will ask for your explicit consent. If we request your consent for this purpose, it will be presented in a manner which is clearly distinguishable as consent to marketing. If you had provided such consent, you have the right to withdraw it at any time, free of charge and such withdrawal will be as easy to withdraw as to give consent.

If you had previously consented to us using your personal information for marketing purposes and would like to withdraw such consent, you will be able to do so by clicking “unsubscribe” option at the end of any marketing email sent to you or by following the instructions to “unsubscribe” on any text message sent for marketing purposes. Alternatively, you could email us at memberservices@csdcu.ie to withdraw your consent or change your preferences.

E-Signatures:

Our E-signature service to complete on loan documents is available through the on-line computerised system, CU Online+, which is part of our main IT service provider Wellington IT. If you use our E-signature service to complete loan documents through the on-line computerised system, that may result in DocuSign Inc. coming into possession of personal data attributable to yourself. Where any such personal data is contained in a loan document which you have signed using an E-signature generated for you by DocuSign, it is intended that such document will have either been purged or redacted by DocuSign within a short time period after you have so signed the document.

Standing order, direct debit, pay deduction and disbursement instructions

If you set up a direct debit with the credit union, the form will be retained in the credit union. To facilitate standing orders, direct debits and pay deductions, we must share the relevant information with third parties such as payment providers (PAYAC) and banks.

You may set up a pay deduction, standing order, direct debit to pay a credit union account which is not your own. You may also disburse part or all of your own direct debit, standing order or pay deduction to an account which is not your own. However, should you choose to do this, under the Data Protection Acts, Cois Sionna Desmond Credit Union cannot provide you with the balance, transaction history or any other personal information on that account, under any circumstances. There may be cases where we can disclose some information to you, such as if you are guaranteeing a loan on that account.

Nominations

The ability of a member over the age of 16 to nominate individuals to receive property in their credit union account on their death is a unique facility available to credit unions members under the credit union legislation by which we operate. The nominated property does not form part of the deceased person's estate.

The member may nominate a person(s) of choice to receive their property (i.e. shares) in the credit union presently up to a maximum value of €27,000. Any amount in excess of this balance forms part of the member's estate and must be dealt with in accordance with the law.

The information relating to you as nominee has been provided to us by the member during their lifetime. A member may change the details of their nominee as often as they like during the course of their membership with the credit union. In addition, there may be instances where a nomination is revoked through marriage or civil partnership, or the death of the nominating member. There is therefore no guarantee that a nomination will be valid until the member has passed away and the validity of the nomination is confirmed by the credit union. As such, we are unable to contact individuals directly to advise them that we are processing their information.

Where a member makes a nomination, we are required under the credit union legislation by which we operate to keep a record of all persons nominated (along with any renovation or variation of any nomination).

We may collect, store, and use your name, address, contact details, relationship to member, bank details (to allow payment/transfer of nominated property) and a copy of your photo ID. We need these categories of information to allow us to record your details in our register of nominations, identify you, to contact you and then upon the passing of the member, to process the nomination (subject to the valid nomination) and transfer any nominated property to you, the nominee(s).

We collect personal information about nominees from the Nomination form completed by the member.

We may also need to share some of the nominee's personal information with other parties, such as the Irish League of Credit Unions (ILCU) and our professional advisers such as solicitors or auditors. Usually information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or auditors as required to comply with the law.

Registering online

We offer our members an online service, this service is optional. We collect some additional information about you when you register your account online. Prior to registering your account, we advise you to read our Website Terms and Conditions and our Privacy policy. The additional data we will need to collect include a username, email address and contact number. Our legal basis for doing this is legitimate interest, findings from research indicated a demand for such a service and it contributes to the business continuity of the credit union.

All information you provide to us through CU Online is stored on secure servers. Any payment transactions undertaken by CU Online are encrypted with TLS technology. Most of the information you submit to CU Online is already held by the credit union with the exception of your unique user name and security questions and answers. Your password and PIN are not available to the credit union or the service provider.

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 including any related to CU Online, the Online Services or your Online Account. For this reason, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk.

You are responsible for providing all you require to safely and properly access and use CU Online and the Online Services including a computer, an internet connection and security software.

CAS Account

We share your information with our CAS service providers. PAYAC Services CLG are the appointed coordinator and programme manager for participant credit unions, FIS Global provide a card issuing and transaction processing service for the issuance of debit cards, FIS also engage sub processors – Gemalto are card manufacturers. Transact Payment Malta Limited ('TPML') are the Bank Identification Number (BIN) sponsor. If we issue you a debit card, Transact Payment Malta Limited ('TPML') (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>

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 right¹. 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.

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. Where possible we record how long we will keep your data, where it is not possible, we will explain the criteria for the retention period. This information is documented in our Records Management Policy. Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- **Accounting** 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. This period extends to 8 years for Current Account Debit cards.
- We keep **income tax** records for a period of seven years after completion of the transactions to which they relate.
- **Forms and records** will be retained in individual member files for seven years after the relationship with the member has ended.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes) for one month.
- If you are a **nominee**, we will retain permanently, your name in our register of nominations. Member nomination forms (and any other documentation related to the nomination will be retained for a period of seven years after the relationship with the member has ended (e.g. the member passing away).
- **Call Recording** where applicable will be retained for three months, then securely destroyed.

Planned data transmission to third countries

This credit union does not currently and does not anticipate any direct transmission of personal data to third countries. Should this change, we will inform you of the safeguards used to allow for such processing. However, third parties who provide services to the credit union may be located in the UK or outside the EEA. To ensure that your personal data receives an adequate level of protection, to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, any transfer shall be made in accordance with the EU approved adequacy decisions for the EU GDPR and the Law Enforcement Directive (LED).

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 www.csdcu.ie or you can ask us for a copy.

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.

Information provided to us by you about others or others about you

There may be instances where you provide us with someone else's personal data or they provide us with yours. Where this occurs, it is important that you seek their approval to disclose their personal data and likewise, they seek yours. We may add it to any personal information we already hold and we will use it in the ways described in this privacy notice.

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 maintaining and administer any accounts you have with the credit union.

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 do so with respect for the security of your data and will be protected in line with data protection law.

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, guidance, 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 Privacy Notice of ILCU can be found at www.creditunion.ie

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.

Payac:

For the purposes of providing current account, debit card and related services to our members, the Credit Union is a participant of Payac Services Company Limited by Guarantee ("Payac"). Payac is credit union owned and operated company that assists participating credit unions in obtaining regulatory approval, developing, implementing and providing ongoing support for payment account services. This includes among other activities assisting in the establishment of operating standards, negotiating third party services and outsourcing arrangements in behalf of participating credit unions.

FIS:

Fidelity National Information Services ('FIS') is a data processor acting on our behalf through Payac for the administration of our card services associated with your current account. This service includes monitoring for and prevention of financial crime, reporting of fraud and other related activities to protect our members from financial loss.

Debit Card:

If we issue you with a debit card, Transact Payments Malta Limited (TPML) 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 <https://currentaccount.ie/files/tpl-privacy-policy.pdf>

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. To administer these insurances we may pass your information to ECCU and it may be necessary to process 'special category' personal data about you. This includes information about your health which will be shared

with ECCU for the purposes of our life assurance policy to allow ECCU to deal with insurance underwriting, administration and claims on our behalf. Further information can be found in our lending privacy notice.

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.



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 and the Foreign Accounts Tax Compliance Act. 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.

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.

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, as amended by the Criminal Justice (Money Laundering & Terrorist Financing)(Amendment)Act 2018 and 2021. 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).

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an internal and external 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.

Parties to Safe Deposit Boxes, Bank and Payment Accounts.

Article 32(A) of 5AMLD, requires the identification of natural or legal persons holding or controlling payment accounts and bank accounts identified by IBAN, and safe-deposit boxes held by credit institutions in each Member State.

The purpose is to deter Money Laundering and Terrorist Financing and to identify those that seek to hide their ownership and control of payment accounts and bank accounts identified by IBAN, and safe-deposit boxes held by credit institutions, and that this information is readily accessible to law enforcement, in an unfiltered manner.

The European Union (Anti-Money Laundering: Central Mechanism for Information on Safe-Deposit Boxes and Bank and Payment Accounts) Regulations 2022 (S.I. 46 of 2022) assigns responsibility to the Central Bank to establish and maintain a central database of IBAN, and safe-deposit boxes information for Ireland, and a central mechanism to enable this information to be accessed.

In carrying out this responsibility, the Central Bank processes personal data on any natural person(s) party to a safe deposit box, bank or payment account in the context of Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR). This may include minors.

Personal information collected and processed is as follows:

Bank or Payment Account – Customer Account Holder / Person Purporting to Act on Behalf of Customer Account Holder

Beneficial Owner

1. Forename and Surname
2. Date of Birth
3. Address (including Eircode if known)

Safe Deposit Box - Lessee

4. Forename and Surname
5. Date of Birth
6. Address (including Eircode if known)

The European Union (Anti-Money Laundering: Central Mechanism for Information on Safe-Deposit Boxes and Bank and Payment Accounts) Regulations 2022 (S.I. 46 of 2022) permits access to information held on ISBAR, through the central mechanism, by the Financial Intelligence Unit (FIU) Ireland, in an unfiltered manner. Gardai and CAB will also have access rights.

The Central Bank is data controller of the personal information held on the ISBAR central database and on the ISBAR central mechanism.

Information is retained on the ISBAR central database for five years after the date of bank/payment account closes or, in the case of a safe-deposit box, the date on which the lease concerned expires.



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.

CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security public safety and for the prevention and detection of fraud. **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.

Call Recording: We may record phone conversations both incoming and outgoing for the purpose of verifying information. **Our Legitimate interest:** To ensure that correct instructions were given or taken due to the nature of our business.



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

When applying for membership of the credit union, we do ask for your preferences in relation to direct marketing. 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. If you had previously consented to us using your personal information for marketing purposes and would like to withdraw such consent, you will be able to do so by clicking “unsubscribe” option at the end of any marketing email sent to you or by following instructions to “unsubscribe” on any text message sent for marketing purposes. Alternatively, you could email us at memberservices@csdcu.ie to withdraw your consent or change your preferences.

Transferring to another Credit Union

Cois Sionna Desmond Credit Union may assist you in transferring your account to another Credit Union. If you request us to do this, we will require your consent to transfer your personal data to the other credit union. For this transfer to take place you will usually be required to open an account in the other Credit Union first, we will then transfer your account history to the relevant credit union on your behalf.

Art Competition

This credit union is involved with the Art competition in liaison with the ILCU. 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.

Schools Quiz

This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools 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. This information is processed only where consent has been given. Where the person providing consent is below 16 then we ask that the parent/legal guardian provide the appropriate consent.

Exercising your Rights

If you wish to exercise any of the below rights, you can request a copy from our office. This form has a guidance document attached which will assist you in completing your request. You can send your request by post, email or by handing it to our office. All requests should be addressed to the Data Protection Officer. Please note we may need to verify your identity, in which case we may ask you to provide us with a copy of your photo ID and proof of address before we can complete the request.

Complaints

Cois Sionna Desmond Credit Union endeavours to meet the highest standards when collecting, using, storing and destroying your personal information. We urge you to notify us if you think that our processing activities are unfair, misleading or inappropriate. We also welcome any suggestions for improving our procedures. This account opening privacy notice aims to provide you with comprehensive detail of all aspects of our data processing; however we are happy to provide any additional information that may be necessary. All complaints, queries or suggestions should be addressed to:

The Data Protection Officer,	(061)392237
Cois Sionna Desmond Credit Union Limited,	dpo@csdcu.ie
Church Street,	
Askeaton,	
Co. Limerick	

Breach Notification

In the unlikely event that the credit union suffers a data breach, we have an appropriate response plan in place. If your personal data has been breached and is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay. We will also notify the Data Protection Commissioner within 72 hours of becoming aware of the breach. An incident report will be carried out on each breach that occurs to analyse the effects of the breach, why the breach occurred and how we can prevent it happening again.

If you have any concerns regarding data breaches in the credit union or would like to report a data breach to us, you can do so by contacting the Data Protection Officer (details above).

If you are in receipt of information that does not concern you, please do not destroy the information but return it to our office as soon as possible.

Contact us

Questions, comments and requests regarding this Account Opening Privacy Notice are welcomed and should be addressed to the Data Protection Officer.

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 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 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.



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 into with us.*

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

Telephone (01) 765 01 00 Lo Call Number 1800 437 737	Postal Address: Data Protection Commissioner 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland
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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 The Data Protection Officer 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 accurateWe want the service provided by us to meet your expectations at all times. 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 using our contact details above.