



SEPA 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 for the purpose of facilitating the below-mentioned objectives. This notice is so that we provide you with information around the use of your data for SEPA related purposes.

Our contact details are:

Address: Church Street, Askeaton, Co. Limerick
Website: www.csdcu.ie
Email: info@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 data. This privacy notice describes how we collect and use personal data about you for SEPA related purposes.

The Single Euro Payments Area (SEPA) is a mechanism that facilitates the standardisation of electronic payments denominated in euro across Europe. There are 36 countries¹ in the SEPA area. These are the existing 27 member states of the European Union², with Andorra, Iceland, Lichtenstein, Monaco, Norway, San Marino, Switzerland, Vatican City / Holy See and the United Kingdom also participating.

The SEPA scheme is used to make electronic transfers of funds from, and to, your credit union account. This can be as once-off transfers, or as standing orders or direct debits. Please see more information on your 'Framework Contract' with us at [include a link to where the member can access this online]

The credit union is an **indirect participant** in the SEPA scheme. To participate in the scheme, we have an arrangement with a **direct participant**, who is a member of a **clearing body**, who ultimately makes the transfer of funds between banks and accounts.

The **purpose of the processing** is the provision of electronic payment services for our members using SEPA. Our members instruct us to make payments on their behalf.

The **legal basis for processing** is for the performance of a contract to which the data subject is party. By choosing to use this service you are agreeing to the terms and conditions associated with the provision of this service.

Who we share your data with – To process a SEPA, or electronic, payment on your behalf, we typically need to know your name, address, IBAN and BIC and the amount of money to be transferred out. We would also need the same information about

¹ As of January 2023

² Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovenia, Slovakia, Spain, and Sweden

the person to whom you are sending the money, and the country in which they are resident. This information can be shared with:

- Our payments partner service provider for our electronic services – Payac Services CLG
- SEPA direct participants – Danske Bank A/S and Intesa Sao Paolo (Italy)
- Recipient banks when transferring money out of your account.
- Our partner organisations, statutory and regulatory bodies, and law enforcement authorities in compliance with any legal obligations, such as for Anti-Money Laundering monitoring purposes.
- Suppliers used for checking the names of members against sanctions lists.
- Systems suppliers providing systems support, off-site data backups, testing backup data, etc.

Personal data about you received from a third party: - Typically, this would be from a bank when transferring money into your account. We would receive information we already hold about you to correctly process the payment - your name, address, IBAN and BIC and the amount of money to be transferred. We would also receive the same information about the person who is sending you the money.

Retention of your data – We are required by law to retain information relating to financial transactions for at least 6 years. Under policy the credit union will retain this information for at least 7 years.

There are no **transfers of your personal data outside of the EEA³**, unless you specifically ask us to make a funds transfer to a financial institution outside of the EEA. SEPA countries outside of the EEA are required by regulation to adhere to data protection practices equivalent to the GDPR.

Processing based on consent – if our lawful basis for processing your data is your consent to do so, you have the right to withdraw consent at any time. You may do this by dropping into one of our offices, or by writing to, or emailing us.

Provision of personal data for an electronic payment – provision of your personal data for your electronic payment is a requirement necessary to enter into this contract. Failure to provide the required information means we cannot process your electronic payment.

Automated decision making - we do not use automated decision making directly in the provision of this service. We may use automated processing to assist in compliance with our legal obligations around the prevention of money laundering, fraud and terrorist financing, for example, to screen for suspicious transactions.

Profiling – We sometimes use systems to make decisions based on personal information we have (or are allowed to collect from others) about you. This information is used for loans assessment, profiling and anti-money laundering purposes and compliance with our legal duties in that regard. We also carry out profiling in order to tailor our marketing to you by profiling members according to categories such as age, loan history, savings, life cycle and date of account opening.

Notification of additional processing – please note that, if, at some future time, we wish to use the data you are today providing for a purpose other than that outlined here, we are obliged to let you know beforehand, unless we are required to do so to comply with a legal obligation.

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, 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.

³ The EEA includes the 27 EU countries and also Iceland, Liechtenstein and Norway. The EU adopted a GDPR Adequacy Decision in relation to the UK, which is valid until June 2025.

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 lending 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@cscdcu.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 Lending Privacy Notice are welcomed and should be address 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 correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.



Request erasure of your personal data. 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 data. 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

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 data, object to the processing of your personal data, or request that we send you a copy/a third party a copy your relevant personal data in a reusable format please contact The Data Protection Officer in Desmond Credit Union (see section Exercising your rights).

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 straightaway if there are any changes to your personal data.