



## **Account Opening Privacy Notice of Mountmellick Credit Union Limited.**

**Mountmellick Credit Union is a member-owned financial cooperative, democratically controlled by its members, and operated for promoting thrift, providing credit at competitive rates, and providing other financial services to its members.**

Data collection, processing and use are conducted solely for carrying out the above-mentioned 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:***

**E-mail:** [info@mountmellickcu.com](mailto:info@mountmellickcu.com)

**Tel:** 057 8624425

**Web:** [www.mountmellickcu.com](http://www.mountmellickcu.com)

**Data Protection Officer:** [dpo@mountmellickcu.com](mailto:dpo@mountmellickcu.com)

### **Addresses:**

- Mountmellick Office: Sarsfield Street, Mountmellick, Co. Laois
- Rathangan Office: New Street, Rathangan, Co. Kildare
- Clonaslee Office: Chapel Street, Clonaslee, Co. Laois

Mountmellick Credit Union is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us. This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes and further processing that may be necessary if you apply for a loan/other service with us.

## ***What personal data do we use?***

- Your name, member number, address, Eircode, date of birth, identification documents (Passport or Driving Licence and proof of current address), email address, telephone number(s), signatures, place of birth, nationality, Politically Exposed status, marital/civil status, marriage/civil partnership cert, the credit union products you hold with us, names and addresses of nominees on your account, source of funds, source of wealth, credit history, transaction data, financial data, contract data, details of salary, occupation, income verification, income and expenditure details, assets and liabilities, Creditors and Debtors details, bank statements, Director/Shareholder ownership, Financial Accounts, accommodation status, mortgage details, property details, previous addresses, spouse/partners details, spouse/partners income details, dependents details, tax status, Tax Clearance Certificate, Tax Identification/PPSN numbers, Tax Residency, beneficial ownership status, details of work visa/immigration permission (if applicable), interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings, IP address, online identifiers (i.e. cookies)

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;***

**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 legal and compliance obligations and requirements under the Rules of the Credit Union, the Credit Union Act 1997(as amended) and Central Bank Regulations.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligation for example anti-money laundering and beneficial ownership reporting obligations.
- Administering any applications for services or products you make and to ensure the provision of that product or service to you.
- In assessing your loan application and determining your creditworthiness for a loan.
- Assessing the applicability of loan protection and life savings protection from ECCU
- In order to purchase loan protection and life savings protection from ECCU.
- Verifying the information provided by you in the application.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering any loan application, you may make or any loans you have taken with us, including where necessary, taking 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.
- 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 other services by way of direct marketing to you.
- When acting as an insurance intermediary, to meet our obligations.

We may also collect, store and use the following “special categories” of more sensitive personal information for example, Information about your health, including any medical condition and sickness.

Information about your health, including any medical condition, health and sickness to assess if you are covered by our insurances.

We need all the categories of information in the list above to allow us to identify you and contact you 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.

### ***The purposes for which we use your sensitive personal data***

The Credit Union will use your personal data to assist it in carrying out the following:

- To allow us to underwrite loan applications
- To allow us request confirmation of Loan Protection and Life Savings Protection from ECCU Assurance DAC (ECCU), a life insurance company wholly owned by Irish League of Credit Unions (ILCU)
- To allow us to process any claims made under the Loan Protection and Life Savings Cover from ECC

### ***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:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our Data Protection Policy.
3. 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.

## ***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. 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. For example, if we require a credit check to consider your loan application and you fail to provide us with the relevant details, we may not be able to take your loan application further.

## ***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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules where this is required or permitted by Law.

## ***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. 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.

## ***Data Retention Periods***

We will only retain your personal information 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 document the reasons for our retention periods and where possible the retention periods themselves in our Data Retention 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.
- We keep income **tax records** for a period of six years after completion of the transactions to which they relate.
- **Loan application** information is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.
- Credit agreements are **contracts** and as such the credit union retains them for seven years from date of repayment of loan and interest in full and twelve years where the document is under seal.
- **Membership Forms** and records will be retained 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.

## ***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, our Cookie Policy 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 username 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.

## ***Planned data transmission to third countries***

Mountmellick Credit Union does not transfer your data outside the EU.

Our information is processed entirely within the EU and, as such, is protected by European-wide Data Protection regulations.

### ***Other Websites & External links***

Our website contains links to other websites. The inclusion of a link on our website does not imply endorsement of the linked website by us. We are not responsible for the content or privacy practices of any third parties or other websites. We encourage you to read the privacy statements and/or policies on other websites you visit to familiarise yourself with how your personal data is processed.

### ***Update to Privacy 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.mountmellickcu.com](http://www.mountmellickcu.com) or you can ask us for a copy.

### ***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.



**Security:** 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

**Third parties:** We may appoint external trusted third parties to undertake operational functions on our behalf such as, agents or service providers engaged by the Credit Union (including their employees, Directors and officers) such as back up and server hosting providers, printers, debt collection agencies, Solicitors, Auditors, Accountants, IT Software and maintenance providers, underwriting software service providers and suppliers of other back-office functions. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with Data Protection law. We may also share your personal information with any third parties to whom you have instructed us to share your information with. Due diligence and security assessments are undertaken, and third parties are bound by Data processing Agreements.

**Guarantors:** 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 the 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

**Credit Assessment:** 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:

- your application form or as part of your loan supporting documentation
- your existing credit union file
- credit referencing agencies such as the Central Credit Register (CCR)

**Irish League of Credit Unions (ILCU) Affiliation:** The ILCU (a trade and representative body for credit unions in the Republic of 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. The Privacy Notice of ILCU can be found at [www.creditunion.ie](http://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. Being affiliated to the ILCU we also have recourse to the following service:

**Electronic Payments:** If you use our electronic payment services to transfer money into or out of your credit union account (such as credit transfers, standing orders and direct debits) or make payments through your debit card into your credit union account, we are required to share your data with our electronic payment service provider CUSOP(Payments)DAC (“CUSOP”) for the purpose of processing of electronic payments services on your account. The Credit Union is a participant of CUSOP. CUSOP is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. CUSOP is an outsourced model engaging third party companies, such as a Partner Bank (currently Danske Bank) to assist with the processing of payment data

**Electronic Payments not through CUSOP:** 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 data with our electronic payment service provider DocuSign.

**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. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable). 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.

**e- Signatures:** If you use our e-Signature service to complete loan documents through the on-line computerised system it may result in DocuSign Inc coming into possession of personal data attributable to yourself. Where any such 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.

**Member Service:** We may use information about your account to help us improve our services to you.

**Foreign Exchange:** if you use our Foreign Exchange service, we are required in some instances to share some of your personal data with our Foreign Exchange services provider (FEXCO)

**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 Acts. 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. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013. 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. We are required to cooperate by law or otherwise through a legal process with Irish and EU Regulatory and enforcement bodies such as Central Bank of Ireland, An Garda Síochána, the Courts, fraud prevention agencies and other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting, CRS and FATCA purposes. Details of the information to be reported to Revenue i.e., name, address, tax identification number (TIN), date of birth, place of birth (where present in the records of the Financial Institution), the account

number, the account balance or value at year end, and payments made with respect to the account during the calendar year. Data may be exchanged by Revenue with other tax authorities.

Details of where the account holder can find further information including the Automatic Exchange of Information portal can be found at <https://www.revenue.ie/en/companies-and-charities/international-tax/aeoi/index.aspx>

**Purpose of the loan:** We are obliged to ensure that the purpose of 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 (“the Act”), the Criminal Justice (Money Laundering and Terror Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing)(Amendment) Act2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives). 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, Bank and Payment Accounts Register (ISBAR). This reporting obligations requires the credit union to submit certain member data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. For further information, please contact the credit union directly.

### ***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**

1. Forename and Surname
2. Date of Birth
3. 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. 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.

**Audit:** To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an internal and external auditor. We will allow the auditors 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.

**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.

**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 (if required) to the CCR.

Data we provide to the Central Credit Register (CCR) in respect of your loan will now be shared with the Central Statistics Office (CSO). (The Statistics Act 1993 provides that the CSO may obtain information from public bodies including the Central Bank). Personal data held on the Central Credit Register includes your name, date of birth, address, gender, telephone number and personal public service number (PPSN). Your PPSN, Eircode and contact telephone number is not transferred to the CSO. The Central Bank is the data controller for the Central Credit Register and the obligations of the GDPR, and general and data protection law apply to them. The Central Statistics Office, (CSO) is the data controller for the information when it is transferred to them and the obligations of the GDPR and Data Protection law apply then to the CSO. Please refer to the [www.centralcreditregister.ie](http://www.centralcreditregister.ie) for more information. More information in relation to the CSO is available at [www.cso.ie](http://www.cso.ie)

**Credit reporting & Guarantors:** Mountmellick Credit Union is required by law to report certain credit information to the Central Credit Register (CCR),

As part of these reporting obligations, we wish to inform you that, in addition to borrowers, guarantors are now also reported to the Central Credit Register, this came into effect 1<sup>st</sup> February 2025.

This means that if you act as a guarantor for a loan, details of the guarantee, including the outstanding balance and repayment performance, will be recorded on the CCR.

This reporting is in line with the Credit Reporting Act 2013, which requires financial institutions to submit accurate and up-to-date credit information. The purpose of the CCR is to provide a comprehensive view of an individual's credit exposure, helping to promote responsible lending and financial stability.

**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 teams' family or a business in which a member of the Board /Management Team has a significant shareholding.

**Legitimate interests:** 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 Central Credit Registrar (see Legal Duty). We have used the Central Credit Register since June 2017.

**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.

CCR use 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. See CCR's Factsheet on how the Central Credit Register works which is available at <https://www.centralcreditregister.ie/about/how-it-works/> it documents who they are, how it works, who owns the information they hold and your rights i.e. your right to request a free copy of your credit report, right to place an explanatory statement on your credit report, right to ask to have your information amended and the right to place a notice of suspected impersonation on your Credit Report.

**Debt Collection:** Where you breach the Loan agreement we may use the services of a Debt Collection Agency, solicitors or other third parties to collect the debt. We will pass them details of the loan application in order that they may make contact with you and the details of the indebtedness in order that they recover the outstanding sums.

**Our Legitimate interest:** The Credit Union where appropriate will, if necessary, have to take steps to recover a debt in order to protect the assets and equity of the Credit Union

**CCTV:** We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security, for the prevention of theft, and for security of credit union staff, members, volunteers, visitors, contractors, public safety and 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, members, volunteers, visitors or contractors to the credit union and to prevent and detect fraud

Your consent : We will only carry out the below processing when we have obtained 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. We need you to opt-in or give prior consent before we can contact you via post, email, phone or text for marketing and promotional purposes. You can change your preferences at any time by opting out or by emailing us at [membership@mountmellickcu.com](mailto:membership@mountmellickcu.com) or writing to us at Mountmellick Credit Union, Sarsfield Street, Mountmellick Co Laoise.

### **Art Competition**

Mountmellick 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. A separate privacy notice is included in all Art Competition entry forms.

### **Schools Quiz**

This credit union is involved in the Schools Quiz in liaison with the ILCU. The School's 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. A separate privacy notice is included in all School Quiz entry forms. If a minor is reading our privacy notice, we strongly recommend that a parent or guardian is present to ensure that the minor understands the text and its implications.

### **Cookies**

By continuing to use Mountmellick Credit Unions website and by not changing your web browser settings to disable cookies, you consent to the use of cookies. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to help us provide a better service, to record session information and/or to assist you in browsing the website. This may in some instances only be statistical data about how you browse our website. For more information on Cookies please see our Cookies Policy on our website. The Cookies Policy should be read in addition to the terms and conditions of the website and is subject to them. If there is any conflict between the Cookies Policy and the terms and conditions, the terms and conditions shall prevail. Our website contains links to and from

third party websites. If you follow a link to any of these websites, please note that these websites have their own cookie settings, and these are not endorsed by us. We do not accept any responsibility or liability for these third-party websites. Please undertake the appropriate due diligence before submitting any information to these websites. If you visit Mountmellick Credit Union's presence on social media sites, the cookies policy of that social media site will apply.

**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, and a copy of that data, to be furnished to you. 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 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:

- E-mail [info@dataprotection.ie](mailto:info@dataprotection.ie)
- Telephone +353 (0)1 765 0100
- Postal Address: Data Protection Commissioner, 21 Fitzwilliam Square South, Dublin 2. D02 RD28

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

If you want access to 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 at Mountmellick Credit Union, Sarsfield Street, Mountmellick Co Laoise or email: [dpo@Mountmellickcu.com](mailto:dpo@Mountmellickcu.com) or Ph. 057 8624425

The Credit Union will be obliged to respond to Data Subject Access Requests within one month from the date of receipt of such Request. An extension of another month may be sought should the Request be found to be complex

**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 always. Please help us by telling us straightaway if there are any changes to your personal information. If you wish to avail of these rights, please contact us.