

# Privacy Notice of Mountmellick Credit Union Limited Guarantors

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 carrying out the above-mentioned objectives.

#### Our contact details are:

E-Mail Tel	info@mountmellickcu.com 057 8624425
Web	www.mountmellickcu.com
Data Protection Officer	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 data. This privacy notice describes how we collect and use personal data about you during and after your relationship with us ends, in accordance with the General Data Protection Regulation (GDPR).

# 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, email, telephone financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone, online identifiers (cookies),Images on CCTV when you visited our premises.

# If you fail to provide personal information

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.

# Purpose for which we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union;
- Verifying the information provided by you in the application
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/ member getting into arrears;
- Collection of the debt; and
- Conducting credit searches and making submissions to the Central Credit Register
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union



• Providing updates on our loan products and services by way of directly marketing to you.

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 heath, 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 and 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.

#### 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

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 information we have (or are allowed to collect from others) about you. This information is used for loans assessment 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.

#### **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.

# **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** or you can ask us for a copy.

#### How we may share the information

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU)<sup>1</sup> and our advisers such as solicitors, debt collectors 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 data with our regulator the Central Bank of Ireland as required to comply with the law. The Privacy Notice of the ILCU is available at <u>https://www.creditunion.ie/</u>

# 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.

#### 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.

<sup>&</sup>lt;sup>1</sup>The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring (audit) services to affiliated credit unions. We may disclose information in the guarantee form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us



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#### Central Credit Register.

The 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 for more information. More information in relation to the CSO is available at www.cso.ie

# 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:



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 maintain 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 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 <u>www.creditunion.ie</u>

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 though 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 Siochána, 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 <u>https://www.revenue.ie/en/companies-and-charities/international-tax/aeoi/index.aspx</u>

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 as part of the membership application 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"), 2018 & 2021 This will include checking/filing reports on the Beneficial Ownership Register and on the Bank Account Register.

# 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  $\notin 2,000$  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  $\notin 500$  or more, the credit union is obliged to report both personal details and credit details of the borrower [and guarantor shortly] 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 <u>www.centralcreditregister.ie</u> for more information. More information in relation to the CSO is available at www.cso.ie

**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

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.

**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 aa 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 <u>membership@mountmellickcu.com</u> or writing to us at Mountmellick Credit Union, Sarsfield Street, Mountmellick Co Laois.



# 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 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. A separate privacy notice is included in all School Quiz entry forms. If a minor is reading 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 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 ++353 (0)1 765 0100	Postal Address: Data Protection
E-mail info@dataprotection.ie	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 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 at all times. Please help us by telling us straightaway if there are any changes to your personal data. If you wish to avail of either of these rights, If you wish to avail of these rights, please contact us