

**Privacy Notice of Altura Credit Union Limited
Lending**

See also our 'Visulayse' Privacy Notice on our website <https://alturacu.ie/members-info>
A credit union is a member-owned financial co-operative, 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 abovementioned objectives. 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. This notice is so that we provide you with information around the use of your data for lending or lending related purposes. Our contact details are:

Credit Union Contact Details	
Address	Altura Credit Union Limited
	Mc Dermott Street
	Gorey
	County Wexford
Phone	0539488700
Email	info@alturacu.ie
Website	www.alturacu.ie
Privacy Notices , Cookie Policy and Information on GDPR	The ' About' Section of our website ' GDPR, Altura Credit Union and You'

Data Protection Officer Contact Details	
Name/Title	Donal O'Connor
Phone	0539488700
Email	dp@alturacu.ie

Altura 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 the lending process and after your relationship with us. If you are an applicant for a loan or a Guarantor please see our website www.alturacu.ie on which you will find our 'Visualyse Privacy Notice', '[General Data Privacy Notice](#)' and '[Privacy Notice for Guarantors](#)' for more information. The link to all privacy notices is <https://alturacu.ie/members-info>

What personal data do we use?

The information we hold about you can vary depending on the accounts and services you use. This includes personal information which you give to us when you are applying for a loan. The personal information we collect about you may include:

Members applying for a loan and members with loans

We may collect, store, and use the following categories of personal information about you:

- Your name, address, date of birth, email, telephone, financial data (including bank & credit card account information) , loan repayment status and credit history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, assets and equity, previous addresses, partners, nominations, Tax Identification/PPSN numbers, passport details to satisfy Criminal Justice Acts in relation to Money Laundering, health information, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage. Details of House insurance, Life assurance policy, confirmation of gift letter, independent valuation on property, Stamp for non EU nationals, separation / divorce agreement. transaction data; contract data, details of products you hold with us, signatures, identification documents, information obtained from third parties such as credit reference agencies or business information providers; information that we gather from publicly available sources such as biographies held on the Internet; recordings of calls between you and employees of Altura Credit Union; information relating to member transactions (such as dates, amounts, currencies, payer and payee details); current or past complaints.

As part of a loan underwriting process, we may need to capture limited information on other relevant individuals where such individuals consent for their data to be shared

Guarantors

We may collect, store, and use the following categories of personal information about you where necessary: Your name, address, email, telephone, PPSN Number, Date of Birth, employment details, occupation, employer name, period of time with employer, residential status, relationship status and dependents, financial data, Wage slips, Bank Statements, recordings of calls between you and employees of Altura Credit Union.

Spouse/Partner (estranged if relevant)

We may collect, store, and use the following categories of personal information about you where necessary : Your name, address, email, telephone, Date of Birth, employment details, occupation, employer name, period of time with employer, residential status, relationship status and dependents, financial data, Wage slips, Bank Statements, Your name, address, email, telephone, financial data, Relationship with member, Occupation and Salary recordings of calls between you and employees of Altura Credit Union.

Dependent individuals

We may collect, store, and use the following categories of personal information about you where necessary Relationship with member, ages, reason for dependency, financial needs.

Who do we collect personal data from?

We process personal data from the following individuals where it is necessary to process the data for a purpose

- Member applying for a loan
- Non member applying for a loan
- Unsuccessful loan applicants
- Member repaying current loans
- Guarantors
- Dependent individuals on the members disposal income
- Relevant spouse/partner for assessing income ability
- Parent / Guardian who may provide information but not act as guarantor

How the personal information is collected

We collect personal information from a number of sources and at loan application stage and thereafter, including information we receive directly from you or from a person acting on your behalf, your employer with your consent, information we obtain from third parties such as credit reference, debt recovery or fraud prevention agencies, which may have originated from publicly accessible sources, information that we gather from publicly available sources such as the Internet.

As a member applying for a loan, you directly provide us with most of the data we collect. We collect data and process data when you:

- Register an online account and apply for a loan
- Apply for a loan in the branch
- Apply for a loan over the phone
- Non member applying for a loan
- Voluntarily complete a member survey or provide feedback

We may also receive your data indirectly from the following sources:

- A member provided your data where you are the guarantor, the spouse, the dependent individual, in such cases the member obtains consent from the adults to capture their data
- Account Information Service Provider (AISP), where you gave given authorisation for the AISP to send the banking details to use electronically.

The purposes for which we use your personal data:

We gather and process your personal information for loan purposes and thereafter for a variety of reasons and rely on a number of different legal basis to use that information. For example, we use your personal information to process your loan application and to maintain the account for you, to help administer your accounts and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations. We will use the information provided by you at loan application stage, 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 Altura Credit Union. Some of these grounds for processing will overlap and there may be several grounds which justify our use of your personal data:

- Assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.

- We are obliged to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering the loan, including where necessary, to take 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.
- Meeting legal and compliance obligations and requirements under Credit Union Rules.
- 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 services by way of directly marketing to you.
- We submit Declaration of Health forms to ECCU for our member free Loan protection & Life Savings Cover. We are obliged to purchase loan protection and life savings protection from ECCU.
- We collect information about the guarantor to ensure the loan can be repaid in the event of default by the member.
- We collect spouses' details where relevant to assess the joint earnings to ensure the member has the means to meet the repayments.
- We collect dependent individuals' expenditure needs to assess the net disposal income of the member.
- To manage your safety and security while you are on our premises.
- To facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders.
- To investigate, exercise or defend legal claims or other claims of a similar nature.
- Contact you for direct marketing purposes, subject to restrictions under the relevant laws, including the right to opt out of such marketing.
- Provide you with information relating to the loans.
- To obtain your feedback on our services.
- To notify you about changes to contracted services relevant to you.
- To ensure we recover any outstanding arrears which may require assistance from external agents.
- To ensure we meet our Money Laundering Obligations as outlines under the Criminal Justice Act.

We may also collect, store and use "special categories" of more sensitive personal information including Information about your health, including any medical condition, health and sickness (See Insurance for further details). We may also use this "special categories" at application stage or if payment break is required. 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.

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.

Special Category Data:

"Special categories" of particularly sensitive personal data require higher levels of protection (information about your health, including any medical condition). 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:

- (a) In limited circumstances, with your explicit written consent.
- (b) Where we need to carry out our legal obligations and in line with our data protection policy.

(c) 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.

Our Loans Officers will avoid processing special categories of personal data where possible. **Special category data could be processed as a result of payments from your bank account to a medical specialist for example. The Visualyse tool Altura Credit Union Limited uses (See our separate privacy notice for 'Visualyse') does not analyse or report on these types of payments.**

Who we share your information with

We share your personal information with trusted third parties who perform important functions for us based on our instructions and apply appropriate confidentiality and security measures, for example:

- a. our legal and professional advisers such as auditors and external legal counsel;
- b. trade / representative bodies;
- c. any sub-contractors, agents or service providers engaged by Altura Credit Union (including our employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
- d. credit reference, debt recovery or fraud prevention agencies;
- e. payment recipients and other financial institutions;
- f. guarantors;
- g. joint account holders.

We may also share your personal information with any third parties to whom you have instructed us to share your information with. We are required to co-operate by law with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, the courts, fraud prevention agencies or other bodies. We are also required to report personal and account information to Irish Revenue for interest reporting.

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, including our lending policy. 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 right. 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 as part of our Data Processing Agreements in place with service providers.

Transfers or mergers

We may disclose personal information relating to our members and loans to any third party in the event of a transfer or merger (or potential transfer or merger).

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.

Automated Decision Making Processes

We may use automated decision making as part of our credit decision process, to enable us to deliver decisions within a shorter time frame and to improve the efficiency of our processes. Visualyse has partnered with an AISP (TrueLayer Ltd <https://truelayer.com>) who are authorised by the Central Bank of Ireland as the AISP in this instance. Truelayer will connect to your bank account, with your consent, in order to retrieve bank account information and transfer it to the Visualyse application. The Visualyse software will implement some analytics reports on the bank account data that inform our loan decision.

The decision process takes into account different types of information, for example: information you have provided in your application such as the amount requested, the repayment period, your income, employment details, credit history with credit reference agencies such as the Central Credit Register and details of other credit facilities you may have such as loans, overdrafts, credit cards, etc. The Credit Union uses this information to apply internal credit assessment rules in a consistent manner. This ensures that your application for credit is treated fairly, efficiently and that we believe you can afford the required repayments. We only use automated decision making to approve loan applications. We never use automated decision making to decline loan applications. Manual evaluations will always take place where the loan is not automatically approved. Where a loan is rejected after manual evaluation the members has the right to appeal. Please contact loans@alturacu.ie or ring us on 0539488700

Updates to your personal information

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us. Our contact details are set out at the beginning of this document.

How long we keep your personal data for

We need to keep/store your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above) taking into account any legal/contractual obligation to keep it. Even when you close your account with us, we must retain some of your personal information in order to comply with legal and regulatory requirements. The criteria we use to determine data retention periods for your personal information includes the following:

- retention in accordance with legal and regulatory requirements. We will retain some of it after our agreement with you has come to an end, based on our legal and regulatory requirements;
- retention in case of queries. We will retain some of it in case of queries from you (for instance, if you submit an application for a product or service and if that is unsuccessful);
- legal disputes or some other type of dispute with another person or each other.

Where possible we record how long we will keep your data. Where that is not possible, we will explain the criteria for the retention period. Once the retention period has expired, the respective data will be permanently deleted.

Examples of Retention Periods

- **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.
- **CCTV** footage which is used in the normal course of business (i.e. for security purposes). 30 days
- **Telephone recordings** for 30 days
- Credit agreements are **contracts** and as such Altura Credit Union retains them for seven years from date of expiration or breach, and twelve years where the document is under seal.
- Loan applications form part of your credit agreement and as such we retain them for seven years.

Lawful basis, our use and sharing of your information

We gather and process your personal information for a variety of reasons and rely on a number of different legal basis to use that information. For example, we use your personal information to process your membership application and to maintain an account for you, to help administer your accounts and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations. Some of these grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

1. To comply with a legal obligation

We are required to process your personal information to comply with certain legal obligations, for example:

- Regulatory authorities:** to report and respond to queries raised by regulatory authorities, law enforcement and other government agencies such as the Central Bank of Ireland;
- Credit Union rules:** To meet our obligations under Credit Union Standard Rules.
- Tax Regulation compliance:** to comply with tax regulations that require us to report the tax status of our members. 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 Altura Credit Union has certain reporting obligations to Revenue under the Common Reporting Standard. 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;
- Legal and Compliance:** to verify the personal information provided to us at loan application stage which is a trigger event for AML purposes i.e. to get up to date identification and address verification papers, in order to meet our legal and compliance obligations, including to prevent money laundering, tax evasion, financing of terrorism and fraud. 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”) (and any subsequent AML legislation)

- e) **Duties to our Regulator:** 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, and compliance purposes. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data 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, the appropriate Supervisory Authority if required under law.
- f) **Audit:** To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our lending records (which may include information about you) for these purposes.
- g) **Purpose of a loan.** We are obliged to ensure that the purpose of the loan falls into one of our categories of lending.
- h) **Central Credit Register:** to supply information to the Central Credit Register and in the event you apply for a loan, to perform credit checks with the Central Credit Register to determine your borrowing options and repayment capacity. Where a loan is applied for in the sum of €2,000 or more, Altura 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, Altura Credit Union is obliged to report both personal details and credit details of the borrower (and shortly a requirement for guarantor details will be introduced) to the CCR.
- i) **Investigation or legal proceedings :** to co-operate with and provide information requested to legal and/or regulatory authorities in the context of investigations or proceedings;
- j) **Record retention:** to keep records of communications and member loan account activities;
- k) **Operations:** to administer our internal operational requirements (including credit, compliance and risk management, system development, staff training, accounting and for audit purposes);
- l) **Lending Regulations:** To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower. 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.
- m) **Home Loans:** If you obtain a house loan from us, it may be necessary for Altura Credit Union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf.

2. To enter into and perform a contract with you for the services which you require (Fulfilling a contract)

This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you to include lending services. In order to consider your application for membership of Altura Credit Union and to process any product/service applications you may make, we have to gather and process some personal information. Examples of processing include the administration of loan accounts, payments, lending and credit decisions. As part of this process, we may be required to pass some personal information to an intermediary or counter-party (e.g. if you perform a payment

transaction, we pass information on the transaction to the payee concerned). Information will be required to assess your loan application and determining your creditworthiness for a loan for example or in order to purchase loan protection and life savings protection from ECCU.

- (a) 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 Altura Credit Union.
- (b) 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.
- (c) 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 be done with respect for the security of your data and will be protected in line with data protection law.
- (d) 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 we can ensure 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.
- (e) 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, compliance, risk, learning and development, and insurance services to affiliated credit unions. As this credit union is affiliated to the ILCU, Altura Credit Union must also operate in line with the ILCU Standard Rules (which members of Altura Credit Union are bound to Altura Credit Union by) and the League Rules (which Altura 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 the ILCU can be found at www.creditunion.ie
- (f) 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. The Privacy Notice of ILCU can be found at www.creditunion.ie
- (g) 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 Altura 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.
- (h) Credit Assessment:** When assessing your application for a loan, Altura 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 which are provided physically by you or electronically where you give authorisation to use an Account Information Services Provider (AISP). When using an AISP, we will receive your banking details directly from the AISP.
 - your existing credit union file,

- credit referencing agencies such as the Central Credit Register.

Altura Credit Union then utilises this information to assess your loan application in line with the applicable legislation and Altura Credit Unions lending policies and procedures.

- (i) **Electronic Payments** 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
- (j) **Home Loans:** If your loan is classified as a 'Home Loan' additional processing may take place such as sharing your data with the Central Credit Register, Searching agents (for judgement searches etc.)
- (k) **Member Services:** To help us improve our service to you, we may use information about your account to help us improve our services to you

3. To enable Altura Credit Union to function as a business (Legitimate Interests)

In certain circumstances, we process your personal information on the basis of the legitimate interests of Altura Credit Union. A legitimate interest is when we have a business or commercial reason to use your loan and other 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. In doing so, we ensure that the impact of the processing on your privacy is minimised and that there is a fair balance between the legitimate interests of Altura Credit Union and your privacy rights. Examples of situations in which your personal information is processed based on our legitimate interests, include:

- (a) **Telephone records:** to keep records of communications and record telephone calls in order to evidence what has been discussed and keep a record of your instructions and to prevent or detect crime;
- (b) **Credit Assessment and Credit agencies:** to tell credit reference and credit registration agencies about your dealings with us including details of your credit facilities and your credit history with us. To search for details of your credit history and information at credit agencies. When assessing your application for a loan, as well as the information referred to above in credit assessment, we will also utilise credit data from credit referencing agencies such as the Central Credit Register.
What is our legitimate interest for doing this? Altura 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.
- (c) **Searches:** We may carry out searches, for example Stubbs or Vision-net in order to assess your credit worthiness to repay a loan. Why? Because we, for our own benefit and therefore the benefit of our members, must lend responsibly and we will use your credit history in order to determine your suitability for the loan applied for. In carrying out such a search we can better determine your overall financial position in order to lend to you;
- (d) **Product and service improvement:** to perform research and analysis aimed at improving our lending products, services and technologies;
- (e) **Safeguarding rights :** to establish, exercise and safeguard our rights, including where necessary to take enforcement action and to respond to claims made against Altura Credit Union;

- (f) **Outstanding debt:** to collect due and outstanding debt which may involve passing your personal information to debt collection agencies. Where you breach the loan agreement we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they make contact with you and details of the indebtedness in order that they recover the outstanding sums. Our legitimate interest here ensures that we will, where appropriate, take steps to recover a debt to protect the assets and equity of Altura Credit Union.
- (g) **Scoring:** We may use credit scoring techniques to either partially or fully assess your loan
- (h) **CCTV:** We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security, public safety and the prevention and detection of fraud. What is our legitimate interest in doing so? With regard to the nature of our business, it is necessary to secure the premises and property therein, and any staff /volunteers/members or visitors to Altura Credit Union and to prevent and detect fraud.
- (i) **Voice Recording:** We record phone conversations both incoming and outgoing for the purpose of verifying information and quality of service. What is our Legitimate Interest? To ensure a good quality of service, to assist in training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes
- (j) **Account Information Services Provider:** True Layer (Ireland) Ltd and Altura Credit Union Limited are two separate Data Controllers. Our legitimate interest: Where True Layer (Ireland) Ltd share banking details with Altura Credit Union it is based on legitimate interest to facilitate the online loan approval process when the member authorises TrueLayer (Ireland) Ltd to do so.

4. What if I have already provided consent?

This is where we will only carry out processing when we have obtained your consent and will cease processing once you withdraw such consent. We use your personal information to make you aware of products and services which may be of interest to you where you have consented to us doing so and in accordance with your preferences. You can at any time withdraw that consent using the contact details below. In the event that you apply for a loan, we may require certain sensitive personal information on your health. You will be asked for your consent to process this type of sensitive personal information. You do not have to provide this information but it may not be possible to provide you with the loan requested if you do not. Other examples are:

- (a) **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/ specialist market research companies.
- (b) **Account Information Services (AIS)** We generally require bank account statements to assist with the assessment of loan applications. The Revised Payment Services Directive (PSD2) provides a means by which Members can supply bank account transactions electronically, by availing of AIS. Using AIS may reduce the time taken to process loan applications. If you consent to using AIS to supply bank account information, we will provide instructions by e-mail, including a link to the portal of an Account Information Services Provider ('AISP') that will enable you to initiate

the AIS process. As a member, this is a new optional service offering to enhance the loan approval timing process which is at no extra cost.

AIS services is provided by an independent third party who is the Data Controller of the information processed.

Collection of Consent for the Account Information Services (AIS) process:

Altura Credit Union Limited generally requires bank account statements to assist with the assessment of loan applications. The Revised Payment Services Directive ([PSD2](#)) provides a means by which Members can supply bank account information electronically, by availing of Account Information Services (AIS). Using AIS may reduce the time taken to process loan applications. AIS is provided by an independent third party, Truelayer (Ireland) Limited. Truelayer (Ireland) Limited is registered as an Account Information Services Provider (AISP) with the Central Bank of Ireland (Institution code C433487). As a member, this is a new optional service offering to you by Truelayer (Ireland) Limited to enhance the loan application process which is at no extra cost.

If you consent to using AIS to supply bank account information, we will provide instructions by e-mail, including a link to the portal of the Account Information Services Provider ('AISP') that will enable you to initiate the AIS process. If you do not consent to using AIS to supply bank account information, you can:

- Provide paper bank statements to us
- Send bank statements to us by e-mail.
- Upload bank statements (when making an on-line loan application).

You can view Truelayer (Ireland) Ltd's privacy notice at <https://truelayer.com/privacy>.

See also our Visualyse Privacy Notice on our website: <https://alturacu.ie/members-info>

Your rights under data protection laws

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 see our website for a guide to your rights. You have several enhanced rights in relation to how we use your information as follows:



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 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.*

If you wish to exercise any of these rights you can contact us using the details below. **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 our Data Protection Officer at dp@alturacu.ie or in writing to Altura Credit Union, Mc Dermott Street, Gorey, County Wexford. Alternatively call in to us and our officers will help you.

Do I pay a Fee?

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.

Identification

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.

Contact for Enquiries

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 information. If you wish to avail of either of these rights, please contact us. If you have any questions about this privacy notice or your personal information, please contact: The Data Protection Officer (Donal O'Connor), at Altura Credit Union Limited, Mc Dermott Street, Gorey, County Wexford email dp@alturacu.ie or telephone 0539488700.

Complaints

You have a right to complain to the Data Protection Commissioner in respect of any processing of your data. The Data Protection Commissioner has enforcement powers and can investigate compliance with data protection laws		
Post Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois	Telephone +353 (0)57 868 4800 +353 (0)761 104 800 1890 252 231	E-mail info@dataprotection.ie