

DATA PRIVACY -GENERAL NOTICE

Altura Credit Union Limited

This Data Privacy Notice is effective as and from 25 May 2018

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 'Information' Section of our website ' GDPR & Privacy Notices'

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

Introduction

The purpose of this Data Privacy Notice is to explain how Altura Credit Union Limited may process your personal information. The General Data Protection Regulation, commonly referred to as 'GDPR', is effective from 25 May 2018 and is a new EU regulation which updates the approach and requirements regarding the capture and use of personal data by businesses and organisations. This new regulation is designed to harmonise data privacy laws across Europe and to protect citizens' data privacy. It strengthens the current rules and governance requirements in relation to the personal data of individuals.

Data protection has always been a priority for us and keeping the data you entrust to us secure is a core part of our business. This new regulation is designed to increase the level of transparency in how personal data is managed and we wholeheartedly embrace this. To facilitate this, we are constantly reviewing our procedures and updating our approach to managing our members' data, to ensure we fully reflect and embrace these new standards. To improve how we inform and communicate with our members in relation to data protection, we have drawn up this Data Privacy Notice which sets out in more detail how your data is treated and managed within Altura Credit Union to support the day to day provision of services for you.

A Data Privacy Notice is a document that every organisation who controls and processes personal information must make available. This Data Privacy Notice ([together , for example, our Cookies Policy, Account Opening Privacy Notice, Lending Privacy Notice , Nominations Privacy Notice, Guarantor Privacy Notice and Children's Privacy Notice](#)) sets out the basis on which any personal

data we collect from you, or that you provide to us, will be processed by us. It details how we collect, use, disclose, transfer and store your personal information.

This Data Privacy Notice and our other privacy notices may be updated from time to time and the current version of this Data Privacy Notice is displayed on our website www.alturacu.ie and available in leaflet form in Altura Credit Union. Amendments will not be made retrospectively.

We will always comply with the General Data Protection Regulation 'GDPR' when dealing with your personal data. Further details on the GDPR can be found at Office of the Data Protection Commissioner's dedicated GDPR website (gdprandyou.ie).

For the purposes of the 'GDPR', we will be the "controller" of all personal data which we hold about you. You can find our contact details at the end of this General Data Privacy Notice. If you are providing personal information on behalf of a third party, you must ensure that the third party receives a copy of this Data Privacy Notice before their personal information is shared with us (e.g. minors).

Why do we collect and use your personal 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:

- a) **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;
- b) **Credit Union rules:** To meet our obligations under Credit Union Standard Rules.
- c) **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;
- d) **Legal and Compliance:** to verify the personal information provided to us 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 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 guarantor shortly] 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 account activities;
- k) **Registration :** to maintain a register of members of Altura Credit Union;
- l) **Operations:** to administer our internal operational requirements (including credit, compliance and risk management, system development, staff training, accounting and for audit purposes);
- m) **Member communications:** to communicate certain information to you such as providing notice of the AGM;
- n) **Security:** to undertake systems testing, maintenance and development in order to ensure network and information security;
- o) **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, Altura Credit Union must record personal data of nominees in this event.
- p) **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.
- q) **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.

- r) **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

This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you. 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 accounts, payments, deposits, 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
- (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
- your existing credit union file,
- credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar

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, ICB, Searching agents (for judgement searches etc.)

(k) Debit Cards etc.: *If we issue you a debit card, Transact Payments Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their privacy policy which is available at <https://www.transactpaymentsltd.com/privacy-policy/>.*

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3. To enable Altura Credit Union to function as a business

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 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 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 bureaus/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 Irish Credit Bureau and 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. ICB are using 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. Please see ICB's Fair Processing Notice which is available at <http://www.icb.ie/pdf/Fair Processing Notice.pdf>. It documents who they are, what they do, details of their Data Protection Officer, how they get the data, why they take it, what personal data they hold, what they do with it, how long they retain it, who they share it with, what entitles them to process the data (legitimate interests), what happens if your data is inaccurate and your rights i.e. right to information, right of access, right to complain, right to object, right to restrict, right to request erasure and right to request correction of your personal data.

- (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 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 all members, and the assets and equity of Altura Credit Union;
- (g) **Scoring:** We may use credit scoring techniques to either partially or fully assess your loan application;
- (h) **Information:** to inform you about new services or special offers we may introduce from time to time;
- (i) **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;
- (j) **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;

4. What if I have already provided consent ?

We will only carry out the below 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) **Art Competition :** We are involved with art competition 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 the 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 and see also our [Children’s Privacy Notice available on our website](#).
- (c) **Schools Quiz:** We are involved in school quiz with the ILCU. The school quiz is open to entrants up to 13 years of age. Upon entry, a parent / legal guardian 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 and our ‘Children’s Privacy Notice’ is available on our website.
- (d) **Cookies :** The E Privacy Regulations separately require that consent is needed where certain cookies are used. These Regulations are currently under review and this privacy notice, and our associated cookie policy will be reviewed on that event. As a user, you need to actively allow certain cookies. [Please see our Cookie Policy and Website Privacy Notice](#) on our Website for more information.
- (e) If you choose to enter into our **Members’ Draw**, we will use your personal information to enter you into the draw and where you are a winner your name will be published on our website as a winner and on our social media and other digital media channels.

What Personal Information we collect about you

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 membership or applying for a new account or service. It also includes personal information we collect automatically, for instance, your IP address, the date and time you access our services when you visit our website, and personal information we receive from other sources like credit referencing agencies. The personal information we collect about you may include:

- home address, date of birth, full name, marital status, place of birth, identification documents, number of dependents, home ownership status, telephone number, email address, signature, eligibility for membership, details of income and source of wealth,

nationality and tax identification number, mortgage details, previous addresses, spouse, partners, nominations

- status and history
- transaction data; contract data, details of products you hold with us, signatures, identification documents
- details of employment status and occupation;
- sensitive personal information concerning your health (See next section);
- information on power of attorney or ward-ship appointments;
- 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;
- closed circuit television may be used in and around our premises for the purposes of security and preventing crime, therefore we may have images of you captured by our CCTV cameras;
- information relating to member transactions (such as dates, amounts, currencies, payer and payee details);
- information we learn about you from the way you operate our services and use our website;
- current or past complaints, online identifiers (i.e. cookies).

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:

- (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.

How the personal information is collected

We collect personal information from a number of sources, including information we receive directly from you or from a person acting on your behalf, 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.

Profiling

We sometimes use systems to assist our decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loan assessments anti-money laundering purposes and compliance with our legal duties in that regard.

How we use cookies

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored

in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can “remember” you on your return visit. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate. For more information on how to manage cookies, including how to disable cookies, [please see our ‘Website Privacy Notice’ and Cookies Policy](#).

How we use personal information for direct marketing

From time to time, we would like to make you aware of other services that we offer which may be of interest to you. We can do this by using some of the personal information we hold about you. You have a right not to receive such information. You can make changes to your marketing preferences at any time by contacting us in writing at the address below.

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. 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.

Transfers or mergers

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

Other jurisdictions

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the laws in Ireland. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient or it may require the recipient to subscribe to international data protection frameworks. For more information about the European Commission's decision on the adequacy of the protection of personal information in countries outside the EEA, please visit: https://ec.europa.eu/info/law/law-topic/data-protection_en

Is providing your personal information obligatory?

We are unable to enter into or administer the relationship with you without some personal information about you. In cases where providing your personal information is optional, we will make this clear. In particular, it is not mandatory that our members sign up to receive marketing communications. 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.

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 Privacy Notice.

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**. We retain these 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.

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 www.alturacu.ie 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 Donal O'Connor, Data Protection Officer, Altura Credit Union, Mc Dermott Street, Gorey, County Wexford (0539488700). 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.

Updates

This General Data Privacy Notice may be updated from time to time and the current version of this Data Privacy Notice shall be displayed on our website www.alturacu.ie.

Contact for Inquiries

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 using the contact details at the beginning of this Notice.

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	Telephone	E-mail
Data Protection Commissioner 21 Fitzwilliam Square South Dublin 2, D02 RD28. Ireland	+353 (0)1 7650100 1800 437 737	info@dataprotection.ie