

## **OUR COOKIES POLICY**

### **ALTURA CREDIT UNION LIMITED**

#### **Introduction**

Altura Credit Union (“we“, “us“, “our“) respects your right to privacy and is committed to protecting and respecting your privacy. This Cookies Policy (together with our Website T&Cs and various Privacy Policies ( <https://www.alturacu.ie/gdpr-and-you> ) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it. NOTE: We may change this Cookies Policy from time to time by updating this page. You should check this page from time to time to ensure you are happy with any changes.

#### **What Are Cookies?**

Cookies are small files that store information on your hard drive or browser that means that the website can recognise that you have visited the website before. They make it easier for you to maintain your preferences on the website, and by seeing how you use the website we can tailor the website around your preferences and measure usability of the website. Most websites use some form of cookies and if you agree to their use, is stored on your browser or the hard drive of your computer or device. These files usually contain data like the site’s name and a unique user ID. Most commercial websites use them, whether they are banks, online publishers, blogs or e-commerce. They are used a wide variety of purposes such as website analytics – counting visitors and their behavior, targeted advertising, recording user preferences or for authentication.

#### **This website uses the types of cookies listed below:**

##### **Necessary**

These cookies are essential in order to enable you to move around websites and use the websites’ features. Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website such as our online banking services. The website cannot function properly without these cookies. ***Full details on the necessary cookies used by this website can be found in our cookie notice (bottom left of the screen when on [www.alturacu.ie](http://www.alturacu.ie))***

##### **Statistics**

Statistic cookies help website owners to understand how visitors interact with websites.

These cookies collect information about how visitors use a website, for instance which pages

visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. This information helps us improve our website so that you can have a better experience when you use it in the future. All information these cookies collect is aggregated and therefore anonymous. ***Full details on the statistics cookies used by this website can be found in our cookie notice (bottom left of the screen when on [www.alturacu.ie](http://www.alturacu.ie))***

## **Marketing**

Marketing cookies are used to track visitors across websites. The intention of these cookies is to enable the credit union and its advertising partners display ads that are relevant and engaging for you across the wider web. Through the information gathered we can tailor our ads to show you only content which we think is relevant to you. ***Full details on the marketing cookies used by this website can be found in our cookie notice (bottom left of the screen when on [www.alturacu.ie](http://www.alturacu.ie))***

## **Cookies and Social Media Sites**

If you are accessing Altura Credit Union through a social media network, such as Facebook or Instagram, you may be subject to cookies operated by those third parties. Altura Credit Union is not responsible for the activities of third-party social media operators so you should check the privacy statements of those operators before using their facilities. This cookies policy applies to this website only.

## **Information about you**

Because cookies can identify you as an individual via your device, it is considered 'personal data' which is defined by Recital 26 of the GDPR as 'any data that can be used to identify an individual either directly or indirectly (whether on its own or in conjunction with other information) is personal data'.

## **What Do We Use Cookies For?**

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 the same reason, we may obtain information about your usage of the website by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. Cookies help us to improve the website and to deliver a better and more personalised service. They enable us:

- to estimate usage numbers and patterns;
- to store information about your preferences, and so allow us to customise the website according to your individual interests;
- to speed up your searches; and
- to recognise you when you return to the website.

We also collect the following information about you through cookies:

- The user's IP address in anonymized form.
- The date and time of your consent.
- The URL from which your consent was submitted.

### Which Cookies Do We Use?

The following are the cookies we use on our website:

#### Necessary Cookies

These cookies are necessary to ensure the website functions properly. You cannot reject these cookies using our cookie management tool. You can control these cookies from your browser settings using the reject all cookies settings. Some functionalities on the website won't work if necessary cookies are rejected. We use necessary cookies to manage your visit to the website and to implement online banking functionality associated with Secure Customer Authentication.

Name	Provider	Purpose	Expiry	Type
ASPSESSIONID#	alturacu.ie	Preserves users states across page requests.	Session	HTTP
CookieConsent	Cookiebot	Stores the user's cookie consent state for the current domain	1 year	HTTP
ASP.NET_SessionId	progress.ie	Stores a unique session identifier for the user in the current Online Banking session.	Session	HTTP
sl#	progress.ie	Stores a unique identifier for a member for 90 days after they have completed an SCA on	3 months	HTTP

Name	Provider	Purpose	Expiry	Type
<u>_ga</u>	www.alturacu.ie	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	HTTP
<u>_gat</u>	www.alturacu.ie	Used by Google Analytics to throttle request rate	1 day	HTTP
<u>_gid</u>	www.alturacu.ie	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	1 day	HTTP

Name	Provider	Purpose	Expiry	Type
		login in Online Banking on that device.		
<u>sti</u>	progress.ie	Stores the user session timeout information in Online Banking.	Session	HTTP

### **Preference Cookies**

Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in. We do not use cookies of this type

### **Statistical Cookies**

These are cookies gather analytics on the usage of our website including distinguishing unique users, remembering the number and time of previous visits, remembering traffic source information and determining the start and end of a session.

### **Marketing Cookies**

Marketing cookies are set by external advertisers to learn about a website visitor's overall online behaviors, such as websites they frequently visit, purchases, and interests that they have shown on various websites. It allows internet advertisers to provide targeted advertising content based on user profiles.

Name	Provider	Purpose	Expiry	Type
ads/ga-audiences	<u>Google</u>	Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.	Session	Pixel

### **Unclassified Cookies**

Unclassified cookies are cookies that we are in the process of classifying, together with the providers of individual cookies. We do not use cookies of this type.

### **Google Analytics**

The website uses Google Analytics to collect information about how visitors use the website. The Cookies used by this product collect information in an anonymous form and are used by many different websites. If you wish to opt out of being tracked by Google Analytics across all websites, please visit <http://tools.google.com/dlpage/gaoptout>

### Managing Cookies Usage

You can manage your cookie preferences by visiting our [cookies declaration](#) or by indicating your preferences on the cookie banner displayed when you first visit the website. You may refuse to accept or you may disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) . If you have any concerns about any material which appears on the website, please contact us by noting our contact details below. Cookies do not in any way compromise the security of your computer. Visitors can use most of the features on this website with no loss of functionality if cookies are disabled from the web browser. However, some features, including our online banking system, require cookies to be enabled in order for the service to function properly.

### 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 <https://www.alturacu.ie/gdpr-and-you>. 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. **In relation to Cookies and their management please also see our Cookie Notice. 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](mailto: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.

### Updates

This 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.

### 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: Data Protection Officer at Altura Credit Union Limited, Mc Dermott Street, Gorey County Wexford email [dp@alturacu.ie](mailto: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

<b>Post</b>	<b>Telephone</b>	<b>E-mail</b>
Data Protection Commissioner Canal House Station Road Portarlinton R32 AP23 Co. Laois	+353 (0)57 868 4800 +353 (0)761 104 800 1890 252 231	<a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>