

## Visualyse

### Altura Credit Union Limited

This Data Privacy Notice is effective as and from 28th February 2022

Credit Union Contact Details	
Address	Altura Credit Union Limited
	Mc Dermott Street
	Gorey
	County Wexford
Phone	0539488700
Email	info@alturacu.ie
Website	<a href="http://www.alturacu.ie">www.alturacu.ie</a>
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

### Why is a Data Privacy Notice required

The purpose of this Data Privacy Notice is to explain how Altura Credit Union Limited may process your personal information through our use of Visualyse, an automated loan decisioning system for loan applications. It sets out how, through this automated process, we disclose, transfer and store your personal information. **PLEASE NOTE:** It is important that you read our separate Privacy Notices (such as our Lending Privacy Notice and General Data Protection Notice) to have complete insight into how we process your data. You can view our Privacy Notices at <https://alturacu.ie/members-info>. The Visualyse software will implement some analytics reports on the bank account data that inform the loan decision.

### Why Visualyse?

Visualyse can fast-track approval recommendations on loans. The integration of this automated tool with our core system ('Progress Banking System') will facilitate an efficient loan officer decision and risk assessment process for your application, will facilitate ongoing responsible lending, and ease administrative burdens for our officers, allowing them to do what they do best – provide exceptional member service to you and to help us make decisions that are efficient, quick, and fair, based on the information provided.

### Visualyse- How does it work?

The Services of the Provider, through their product 'Visualyse' is designed only to assist us in the processing of loan applications. It is a method of assessing your likely conduct of an Account based on a range of information, including the conduct of your previous similar accounts. Visualyse is hosted as a web app in Microsoft Azure's managed App Service platform and the application data is hosted in a replicated Azure SQL Database. Azure Security Center is leveraged to provide unified security and advanced threat protection. The use of Visualyse may have a legal or other significant effect on you as it will indicate to our officers whether or not your application for a loan is likely to

be successful. However, there is human intervention in that our officer ultimately makes the decision on your application. The decision to lend is not made by Visualyse but it is facilitated by it. It takes account of information from three sources - the information you provide on your application, information provided by credit reference agencies and information that we may already hold about you to make an overall assessment of your application.

#### **What if my application is declined?**

If you submit an application and it is declined, you can contact us to have the decision reconsidered and you will be advised of your right of appeal.

#### **Does our automation through Visualyse to facilitate decision making system use Profiling?**

Profiling is a form of automated processing of your information to evaluate, analyse or predict your economic situation, preferences, reliability, behaviour, and for example, to assess your transaction history and/or current repayments and/or Account balances. The AIS system we use does not come within the definition of 'profiling' based on the European Data Protection Board definitions. Profiling is not automated. Altura Credit Union Limited, as part of our loan decisioning process, will use member specific information to make better lending decisions. This can help us understand the likelihood of whether someone will repay their loan. Probability of default may be measured as part of our risk assessment process on a case by case basis and may be considered by our Loans officers.

#### **Data Protection Impact Assessment ('DPIA')- is there a risk to my data?**

As this is a new technology is being introduced by Altura Credit Union for loan applications, Article 35(1) requires us to conduct a data 'impact assessment' to determine if there is any high risk to your data. The Software programme includes functionality for discovering and classifying data, managing database vulnerabilities, and detecting anomalous activities that might indicate a threat to the database. The service can however discover, track, and help remediate potential database vulnerabilities.

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. The Provider has in place appropriate security measures (both technical and organisational) against unlawful or unauthorised processing of Personal Data, in compliance with Data Protection Legislation. We do not allow third-party service providers to use your personal data for their own purposes unless they are deemed to be controllers in their own right. Usually, information will be anonymised but this may not always be possible. The Visualyse decision-making methods used are regularly tested to ensure they remain fair, effective and unbiased. The Provider is obliged by contract to notify us within 24 hours in the unlikely event that any data is compromised.

A DPIA is a risk and compliance assessment of processing operations. As part of our compliance obligations, Altura Credit Union has reviewed, through a Data Risk Assessment, the functionality of Visualyse, to assess the lawful basis of processing your personal data and the level of appropriate technical and organisational measures that we have in place and as required under the GDPR. A detailed assessment of how your data is processed has therefore been carried out, including an analysis of the processing across the data protection principles. The assessment found that there were no residual 'high risks' to your personal data. If you require any information on the risk analysis, please do not hesitate to contact the DPO at the details set out at the start of this Notice. Specifically, regular security risk assessments will be carried out to check that your personal data is sufficiently protected and are in line with security policy.

### Where do I fit in to the process of data collection and automated processing?

STAKEHOLDER	DATA PROTECTION ROLE	FUNCTION
Altura Credit Union Ltd	Data Controller	All data processed and collected necessary for your loan application, our assessment and decision-making process
Truelayer	Data Controller	Account Information Service Provider "AISP"
Your bank	Data Controller	Bank transaction data passed to AISP
Azure	Sub Processor	Cloud storage
Graphical Financial Analysis Limited (The 'Provider' for the tool ' Visualyse)	Processor -	Provides the software service functionality- See their website footer for their Privacy Statement and Security Statement at <a href="https://www.graphicalfinancialanalysis.com/">https://www.graphicalfinancialanalysis.com/</a>
Our Banking system software- 'Progress Banking Systems'	Processor	Provides the app functionality through the banking software system
You- our valued member	You are the 'Data Subject' whose information we protect	

### What Data is processed by Visualyse?

Our separate Lending Privacy Notice ('*what personal data do we use*') sets out the data we typically process as part of a loan application ( see <https://alturacu.ie/members-info>). In relation to Visualyse, our Officers input data into the software application as part of our credit risk assessment process for loan applications received. Included are the details of assets, liabilities, income and expenses, including certified financial statements received by us from you. Visualyse processes loan applications and analyses the risk of default for a loan and compliance with our risk appetite. The hosted service includes a method and means for retrieving any loan applicant data from the Central Credit Register and of displaying and analysing such data. The information processed for automated decisions include:

Income	Length of borrowing history	Discretionary spending
Loan purpose	Your age	Credit rating
Share details	Transaction history	Your other loans, mortgages and products
Duration of Membership	Employment details	Bill repayments
your address, employment history and the industry sector you work in	bank account statements and open banking data (transactions, balances)	The number and type of credit agreements you have and how you've used them
Whether you've been late making payments	Whether you've had any court judgments made against you	whether you've been made bankrupt or insolvent or other form of debt-related arrangement.
Vision Net search results	Financial position	

Analysing this information helps us assess your ability to repay and meet the periodic loan payments. The Visualyse facility is just one component of our overall decision-making process with

regard to credit decisions. Using an automated process means we may, after loan officer review, decide that we are unable to offer you a loan, or only offer you a loan for a lower amount and/or shorter term that you requested.

### **Special Categories of Data (Sensitive 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 in our use of the Visualyse system where it is required. 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.

Our Loans Officers will avoid processing special categories of personal data where possible.

**Note: Special category data could be processed as a result of payments from your bank account to a medical specialist for example. The Visualyse tool does not analyse or report on these types of payments.**

Please see our separate General Data Protection Privacy Notice and Lending Notice as to how Altura Credit Union processes Special Category Data.

### **How the personal information for Visualyse is collected and processed**

We use information provided directly by you, information we may hold about you and information from third parties who may be acting on your behalf. For example, when you apply for a loan with us, we use different data sources to understand and assess your ability to repay the loan. We use the information that is provided by you on the applications and information from third parties such as credit reference agencies. Data may be supplied by 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. Our Service Provider (Graphical Financial Analysis Limited) can store, adapt and translate your Data to the extent reasonably required for the performance of the Provider's obligations. Examples are the multiplying or dividing of values disclosed by your data (eg your income) to generate repayment capacity calculations. In summary we collect data

- (1) Directly from you via the loan application form.
- (2) Direct from the Central Credit Register for credit history data where the loan amount requires the CCR enquiry to be made
- (3) From your bank account, on receipt of direct instruction from you via Truelayer Software Provider using TrueLayer bank APIs to extract transaction data into the Visualyse tool.

### **Who the Provider shares your information with**

For information on who we share your data with, see our separate Lending Privacy Notice. In relation to whom the Provider of the software 'Visualyse' shares your data, the Provider has obligations to us and you of confidentiality, a duty of care and a duty of non-disclosure. The Provider may however disclose your data to their officers, employees, professional advisers, insurers, agents, subcontractors and IT provider(s) who have a need to access the Information for the performance of their work for and on our behalf. The Provider cannot however subcontract any of their obligations without our prior written consent. The Provider however, may also share data that is required to be disclosed by any law or regulation, by any judicial or governmental order or request.

### **Change of purpose**

You can be assured that we will only use your data for the Visualyse process 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.

### **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**

The Provider of the Visualyse software will not retain any Data for more than 30 days, unless otherwise requested by us, or as required by legislation and/or regulation. In the meantime, the duration of the processing of your data will be determined by us in accordance with the terms of our Lending Privacy Notice. Visualyse is used to process your loan application and once the application process is completed and the loan decision is made your data that must be retained is transferred to our Progress Banking system and deleted from the Visualyse system. Truelayer retains your data momentarily and only for as long as is necessary and for the duration of the transfer of data from your bank account to the Visualyse software.

### **Examples of Retention Periods**

For other examples of Retention Periods, see our separate Lending Privacy Notice.

### **Why do we collect and use your personal information?**

We gather and process your personal information using the Visualyse system of assessment for a variety of reasons and rely on a number of different legal basis to use that information.

#### **Contract**

Altura Credit Union Limited's Legal Basis for processing your data is contract. This is also the legal basis for our banking system (Progress Banking) to process your data. Our processing of your data is undertaken for the purposes of entering into a contract with you for the provision of a loan to you. The contract is between you and Altura Credit Union.

#### **Regulatory**

The legal basis for processing CCR information on you is regulatory.

#### **Consent**

Your consent is required in order to carry out the AIS data retrieval process. This processing is not required by Altura Credit Union to carry out an assessment to your loan but is an option for you.

#### **Other controllers and processors**

There are additional controllers in the loan processing chain, each establishing their own lawful basis for the processing.

**TrueLayer GMBH** – use legitimate interest as their lawful basis for processing your data. If you consent to the AIS data retrieval process, their T&Cs are presented to you.

### **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](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.

#### 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 at Altura Credit Union Limited, Mc Dermott Street, Gorey, County Wexford email [dp@alturacu.ie](mailto:dp@alturacu.ie) or telephone 053 9488700

#### 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

#### 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. **Updating this Privacy Notice** Amendments will not be made retrospectively.

**End of Privacy Notice –9<sup>th</sup> March 2022**