



COOKSTOWN
CREDIT UNION LIMITED

Third Parties Privacy Notice

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted solely for the purpose of carrying out the abovementioned objectives. 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:

Address: 16 – 18 Burn Road, Cookstown, Co Tyrone, BT80 8DN

Phone: 028 86762840

Email info@cookstowncu.com

Contact: Data Protection Officer - 02886762840

Cookstown Credit Union is committed to protecting the privacy and security of your personal data. This privacy notice describes how we collect and use personal data about you during and after your relationship with us.

What personal data do we use?

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

- Your name, address, date of birth, email, telephone, relationship to the member, financial data, status and history, signatures, passport details and other identifying documentation, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings.

The purposes for which we use your personal data:

The credit union will use your personal data to assist it in carrying out the following:

- Verifying information provided by you in relation to your authorisation to transact on a member's account;
- Ensuring that the authorisation is legitimately in place and that all transactions are in accordance with the authorisation;
- Meeting legal and compliance obligations and requirements under the rules of the credit union and regulators.

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 right¹. 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.

If you fail to provide personal data

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.

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.

Data Retention Periods

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. 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. This information is documented in our Retention Policy.

Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

Planned data transmission to third countries

Data may be transferred from us to the Republic of Ireland (see below: sharing of your information). The data is transferred on the basis of an adequacy decision by the UK in respect of the EU.

Updates to this notice

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website at www.cookstowncu.com or you can ask us for a copy.

Our use and sharing of your information

We will collect and use relevant information about you and your relationships with us. We will typically collect and use this information for the following purposes:

¹ As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.



Your consent

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 do so with respect for the security of your data and will be protected in line with data protection law.

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, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.



Our legal duty This basis is appropriate when we are processing personal data to comply with comply with UK or Northern Ireland Law

Regulatory and statutory requirements: To meet our duties to regulators (the Financial Conduct Authority (FCA) and the Prudential Regulation Authority ((PRA), we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will also hold the information about you when you are no longer a member. We may also share information with certain statutory bodies such as Department for the Economy (DfE), the Financial Services Compensation Scheme (FSCS) and Financial Ombudsman Service (FOS) if required by law.

Compliance with our anti-money laundering and combating terrorist financing obligations: 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, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and associated legislation.

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.

Nominations: The Credit Unions (Northern Ireland) Order 1985 (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. The credit union must record personal data of nominees in this event.



Legitimate interests A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security to protect against crime and to ensure the security of all credit union personnel, visitors and property.

Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information, quality of service and for training purposes. This will also include the recording of the virtual AGM meeting.

Our legitimate interest: With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff /volunteers/members or visitors to the credit union.

Our Legitimate interest: To ensure a good quality of service, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes.

Your Rights in connection with your personal data are to:



To find out whether we hold any of your personal data and **if we do to request access** to that data and 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 to continue 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 with your consent or under a contract that you have entered into with us.*

You have a **right to complain** to the **Information Commissioners Office (ICO)** in respect of any processing of your data by:

Tel: 028 9027 8757 or 0303 123 1114 **Email:** ni@ico.org.uk **Post:** ICO, 3rd Floor, 14 Cromac Place, Belfast, BT72JB

****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 a copy/a third party a copy your relevant personal data in a reusable format please contact the Data Protection Officer in writing using their contact details above.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. We also reserve the right to refuse to comply with the request in such circumstances.

We may need to verify your identity if we have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Ensuring our information is up to date and accurate. We want the service provided by us to meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal information. If you wish to avail of any of these rights, please contact us on 028 86762840.