



STRENGTH IN MEMBERS

DATA PROTECTION STATEMENT - ONLINE BANKING USERS (CU ONLINE)

1. Overview of Online banking data

We want to explain clearly how we process your Personal Data when you apply for and use our online banking facilities as a Credit Union Member.

In order to provide our online banking services, we need to collect Personal Data in order to set-up and manage your online banking account. This section of the Data Protection Statement provides specific information relating to your online banking account.

Note: You must be an existing Credit Union member to apply for an online banking account. To see how we process your data in relation to your Credit Union Membership please see the section in this Data Protection Statement Overview of Member Account Data.

2. Categories of Personal Data

We process personal data as a result of your interaction with our online banking services.

When you register for and use our online banking facility, we process the following categories of personal data.	
Category of Personal Data	Description
Registration data	This includes email address, username and password(hashed)
Contact Data	This includes email address and mobile phone number.
Log data	This includes data about your use of our online banking services, including data about the time and date of your interaction as well as IP address and transaction information.
Financial Data	This includes financial data such as your account status and transaction data as well as information on accounts that you set-up for online transactions.
Correspondence Data	If you complete an online enquiry form, we will record details of your enquiry and our correspondence.

3. Processing Activities

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

We have to process Personal Data legally. We collect data when you interact with online banking in order to provide a secure service and to process your online banking instructions.		
Purpose of Processing	Categories of Personal Data	Lawful Basis
To register you for online banking services	Registration data	Contract
To process your online banking instructions	Financial data	Contract
To support your online banking interactions	Correspondence data	Contract
To manage security of online banking services	Log data	Legitimate Interests

4. Sources of Personal Data

We receive information from you when you register for online banking services and whenever you interact with those services from logging into your online banking account to carrying out financial transactions on your Credit Union account using online banking facilities.

We may receive information from you if you apply for a loan using the online banking facility. When you apply for a loan through the online banking service, we collect the same information to process your loan application as we would collect when you apply for the loan in person at the Credit Union. (See Loan Information for further information about how we process your Personal Data in relation to loans).

This information is collected from you directly as a result of your interaction with the Credit Union online banking service.

5. Retention

We will only retain Personal Data for as long as it is needed for the purpose for which it was collected. After that it is deleted from our systems.

Generally, data collect specifically for delivery of online banking services is kept until you delete your online banking account.

Note that this section of the Credit Union Data Protection Statement relates only to how we process data relating to the Credit Union Online Banking facility.

We provide information about how we process your data when you interact with any of the Credit Union Services such as becoming a member, loans; our website; and other general services offered

by the Credit Union on a service by service basis. You can also read the full Credit Union Data Protection Statement [here](#).