



STRENGTH IN MEMBERS

DATA PROTECTION STATEMENT - LOAN ACCOUNTS

1. Overview

We want to explain clearly how we process your Personal Data when you apply for and receive a loan from the Credit Union.

In order to provide Credit Union loans, we need to collect Personal Data from our members. This section of the Data Protection Statement provides specific information relating to loan applications and maintenance of loan accounts.

2. Members and their representatives

Our Members are individuals to whom we provide Credit Union loans.

For the most part we transact directly with members in relation to the operation of the Credit Union loans. On occasion we may transact with relatives, guarantors or representatives who are acting on behalf of a member.

When we transact with someone on behalf of a member, we will also collect limited additional Personal Data about that person.

- a person who acts as guarantor on a member's loan;
- a spouse or relative who provides information to us to support the loan application;
- a legal representative of a member who communicates with us on the member's behalf.

3. Categories of Personal Data

This Data Protection Statement provides information relating to the categories of Personal Data we process.

| When you apply for a Credit Union loan, we collect the following information | |
|--|--|
| Category of Personal Data | Description |
| Contact Data | This includes email address, phone number, postal address, billing address. |
| Financial Data | This includes financial data such as your account status and history. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, |

When you apply for a Credit Union loan, we collect the following information

| Category of Personal Data | Description |
|----------------------------------|--|
| | mortgage details, other loans and debts, previous addresses, spouse, partners and we may request further information to support the purpose for the loan. |
| Correspondence Data | If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence. |
| PPSN | Your Personal Public Services Number (PPSN) will be collected, if not already on file in order to meet our reporting requirements to the CCR. |

4. 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. As a regulated entity much of the data that we process is required to meet with a regulatory obligation or in order to deliver Credit Union loan services to you. | | |
|---|---|--|
| Purpose of Processing | Categories of Personal Data | Lawful Basis |
| To process your application for a loan; | Contact Data Financial Data | Contract |
| To assess your application for a loan; | Contact Data Financial Data PPSN | Legal Obligation Legitimate Interests |
| To provide loan drawdown and to manage the repayment schedule To provide you with information about the performance of your loan; | Contact Data Financial Data Correspondence Data | Contract |
| To administer the ILCU Loan Protection Scheme; | Contact Data Financial Data | Contract |
| To implement credit control measures where there are missed loan repayments; To carry out credit control including collecting and enforcing debts and arrears | Contact Data Financial Data | Contract |
| to comply with our legal reporting obligations in respect of the Central Credit Register (CCR); | Contact Data Financial Data PPSN | Legal Obligation |
| to interact with the regulator and the Central Bank of Ireland for reporting, compliance and auditing purposes; | Contact Data Financial Data | Legal Obligation |

5. Sources of Personal Data

We receive information from you when you apply for a loan from us either or online or over the phone.

This information is collected from you directly through the loan application form or from you and other people in the case of a joint loan application or where proof of household income is sought.

We receive information from external sources such as the CCR and Stubbs Gazette when we carry out Credit Checks relating to the Loan application.

We receive information from you during the course of the loan such as:

- information related to loan repayments;
- information you supply when you communicate with us about your loan repayments.

We may receive information about you from a representative when they communicate with us on your behalf.

6. Retention of Loan information

Our retention policy is as follows:

| Purpose | Retention Period |
|---|--------------------------------------|
| Loan application and approval, loan administration | Termination of loan + 7 years |

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

We provide information about how we process your data when you interact with any of the Credit Union Services such as membership; website; online banking; 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 at [here](#).