

**ALTURA CREDIT UNION LIMITED  
PRIVACY STATEMENT  
CHATBOT**

<b>Credit Union Contact Details</b>	
<b>Address</b>	Altura Credit Union Limited Mc Dermott Street
	Gorey
	County Wexford
<b>Phone</b>	0539488700
<b>Email</b>	info@alturacu.ie
<b>Website</b>	<a href="http://www.alturacu.ie">www.alturacu.ie</a>
<b>Privacy Notices , Cookie Policy and Information on GDPR</b>	The 'About' Section of our website 'GDPR, Altura Credit Union and You' <a href="https://www.alturacu.ie/gdpr-and-you">https://www.alturacu.ie/gdpr-and-you</a>

<b>Data Protection Officer Contact Details</b>	
<b>Name/Title</b>	Data Protection Officer
<b>Phone</b>	0539488700
<b>Email</b>	dp@alturacu.ie

### **Introduction**

In order to enable you to use the Chatbot, Altura Credit Union Ltd process information about you ("Personal Data") in accordance with the terms of this Privacy Statement. Livechats website also provides very helpful information as to how and why you're your data is processed by them. You can visit <https://www.livechat.com/legal/privacy-policy/> Our own website will also help you at <https://www.alturacu.ie/gdpr-and-you>

### **Purpose of Chatbot**

To introduce a new digital channel of member engagement available via our website for the improvement of our service to our members. You can use the facility at your own convenience from home. Without the Processing of your Personal Data, you will not be able to access the Chatbot.

### **Altura Credit Union and GDPR**

We are strongly committed to privacy and personal data protection. We respect your rights under the European General Data Protection Regulation ("GDPR") (and all other local legislations that might be applicable) and comply with all of the requirements in respect of the Processing of your Personal Data. This privacy notice explains how we process your Personal Data when you use the Chatbot. This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address above. Data protection has always been a priority for us and a core part of our business is keeping the data you entrust to us secure. This new regulation is designed to increase the level of transparency in how personal data is managed through and after, for

example, Chatbot. We will always comply with the General Data Protection Regulation ‘GDPR’ when dealing with your personal data. Further details on GDPR can be found at Office of the Data Protection Commissioner’s dedicated GDPR website (gdprandyou.ie).

### Who is involved in the Processing of your Personal Data?

The data controller collecting the data is Altura Credit Union Ltd. Data used by the Chatbot is used only for the intended purpose stated at the time that the information is collected. Altura Credit Union Limited makes every practical effort to avoid excessive or irrelevant collection of your data. If you, our valued member, believes that chatbot has collected excessive information about you, we encourage you to contact us to raise any concerns. The contact details are set out at the beginning of this Privacy Notice.

STAKEHOLDER	DATA PROTECTION ROLE	DESCRIPTION OF DATA
<b>Altura Credit Union Ltd</b>	Controller	All data collected as part of chatbot and set out in this notice
<b>Live Chat</b> <a href="https://www.livechat.com/legal/privacy-policy/">https://www.livechat.com/legal/privacy-policy/</a> <a href="https://www.livechat.com/legal/security/">https://www.livechat.com/legal/security/</a> <a href="https://www.livechat.com/legal/gdpr-faq/">https://www.livechat.com/legal/gdpr-faq/</a>	Processor	Provides the functionality and stores chat history
<b>You the member</b>	You are the ‘Data Subject’ and whose information we protect	
<b>CU Apps and Metamo</b>	Engaged for the tailoring of Chatbot to suit our needs – Neither are a Processor nor a controller. Metamo will co-ordinate the relationship	

### Will someone contact me?

A member of staff within Altura Credit Union may contact you should you request a callback. The chat history in LiveChat is accessed by Altura Credit Union officers who have access to LiveChat history. LiveChat is responsible for issuing the chatlogs. They are sent from ‘support@livechatinc.com’. A call back email is generated and issue by Livechat to Altura Credit Union to a specific email address when you request a call back. We will then contact you

## Relevant Privacy Notices and other resources

It is important that you read our other Privacy Notices on our website which may be relevant to you. In particular our Account Opening Privacy Notice, General Data Protection Privacy Notice, Lending Privacy Notice and our 'Guidance on GDPR' and how we process your data as you may be engaging with Chatbot inquiring about membership, for example, or our loan products.

## is there a risk to my data?

An assessment has determined that there is no High Risk to your data. As a new technology is being introduced by Altura Credit Union Article 35(1), we are required to determine if there is any high risk to your data. We have reviewed the lawful basis of processing your personal data and the level of appropriate technical and organisational measures that are in place for Chatbot and as required under the GDPR. We have established, following a review of security reports and other documentation, how we can

- maintain transparency measures;
- Limit additional data collection;
- Implement an automated retention and deletion arrangement so your data is removed automatically when it is no longer required;
- Implement additional security measures.

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

## Which Personal Data will be Processed- for what purpose?

We collect only personally identifiable information that is specifically and voluntarily provided by you to the Chatbot. Altura Credit Union Limited receives limited identifiable information. Chatbot asks you some questions. Three of the questions relate to a call-back option involving your personal data as follows

- what is your name,
- what is your member number
- what is your phone number.

These data elements are considered personal data. There is also an intent 'what is your address' which is asked to identify if you are a member at our local CU branch.

- no email address is collected.
- No IDs or IPs are collected in access, error or security audit logs.

The data is either collected from the you directly or generated as a result of your actions. Additionally data processed may include your conversation history e.g. any of your manually inputted text and responses to questions from the chatbot, feedback ratings and comments you have made in the chat.

### Sensitive data

In replying to a Chatbot question, you may include 'special category' (sensitive) data. It is important to note that *no special category data is required* to be provided. Our intention is not to seek any sensitive information through the Chatbot. Sensitive information includes a

number of types of data relating to race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life or criminal record. **We suggest that you do not provide sensitive information of this nature.** If you do wish to provide sensitive information for any reason, Altura Credit Union Limited accepts your explicit consent to use that information in the ways described in this privacy statement or as described at the point where you choose to disclose this information.

### **Cookies**

Cookies are used by Chatbot. The parameters are responsible for tracking Greetings displayed, number of chats, version of LiveChat, localization, last operator the visitor chatted with, name of the visitor, session ID and number of visited pages. The cookie is required for the Chat Widget to work properly on the member's side. It's a normal cookie with 3-year expiration date. For our Cookie Policy, see our website [www.alturacu.ie](http://www.alturacu.ie)

### **Limitation periods for data- retention**

The chat history is stored by LiveChat Inc, Boston, United States ([www.livechat.com](http://www.livechat.com)). The location of the storage is in the EU, in Frankfurt. Chat history is held for 30 days and then deleted. Chat history logs are then deleted on a rolling basis.

We will only Process your Personal Data for as long as it is as long as your access to the Chatbot is not deactivated. Altura Credit Union have established an internal policy with respect to the retention periods for your Personal Data. After the lapse of the 30 day period, your data is deleted. Once you have ended the chatbot session, the information will be held on Facebook messenger for one month then deleted, and Altura Credit Union Ltd will have no further access. If you request the right to Erasure - We will delete all the data that has been recorded during your conversations with the chatbot and we will inform you when the request has been processed. We will remove your data from the databases, however your conversation history will still be retained by Facebook in line with the Facebook platform user agreement you agreed directly with them. Deleted data will neither be shown nor accessible in the service (web application or the API), but still be present in the backups, until the backups is rotated and overwritten.

As a security measure for your data, storage encryption is encrypted with 256-bit Advanced Encryption Standard (AES) algorithm and is in accordance with good industry practice.

### **Consent**

In order to accept and process personal data, consent from you is required. This consent is collected via a tick-box option before you move past the first screen with the chatbot. We will only carry out processing when we have obtained your express consent and will cease processing once you withdraw such consent. You can at any time withdraw consent by contacting us. Full contact details are provided at the start of this notice, or you can contact the MSO at 0539488700. For other data processing contexts that reply on your express consent, see our General Data Protection Privacy Notice on our website <https://www.alturacu.ie/gdpr-and-you>.

### **How Information about you is used.**

Based on your consent, your data will be used by Altura Credit Union for the purpose of providing the most relevant experience for you. Specific information related to your Facebook profile will be shared by Facebook with the chatbot for the duration of your session (i.e. your interaction with the chatbot), in order to personalise the chat.

The information that Facebook may share is:

- Your first and last names
- Location and language;
- Gender

### **How we may share the data we collect with third parties**

Access to the chat history in LiveChat is controlled by Altura Credit Union and we identify what of our officers should have access. Access to all chat history will allow a review of the type of questions we ask you so we can improve our service over time. Your information will be stored on the chatbot application. Altura Credit Union Ltd will not share your information with anyone who is not directly connected with the chatbot.

We recognise that your information is valuable and we take all reasonable measures to protect your information while it is in our care. In order to access and communicate with the Chatbot, you will need to access Facebook. This is because the Chatbot is only accessed through Facebook's Messenger service. Furthermore, in order to get answers to your questions, the data you give the Chatbot is processed via DialogFlow (owned by Google). This is because the logic and the content that makes up the Chatbot is built on the Dialog-Flow platform. Both Facebook and Google, who are third party providers, are operating at the same standard of privacy protection that Altura Credit Union Limited does.

#### Regulation and disclosure

Altura Credit Union Limited may disclose your personal information to regulatory or other agencies or to other third parties as required by, and in accordance with, applicable law or regulation. Your personal information is not shared with any third party, for any secondary or unrelated purposes unless otherwise disclosed at the point of collection. If there is an instance where such information may be shared, you will be asked for permission beforehand.

#### Other third parties

This privacy notice does not apply to the practices of third parties that we do not own or control (such as Facebook and Google), including but not limited to any third-party websites, services and applications ("Third Party Services") that you elect to access through the Chatbot or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third-Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third-Party Services. We encourage you to carefully review the privacy policies of any Third-Party Services you access.

### **Other jurisdictions- is my data transferred outside Ireland?**

#### Data transfer outside the EEA

Data is transferred across borders outside the European Union. The sub-processor is US based, so there is potential for your data being transferred to the US and Germany. Transfer mechanisms as well as information about the processing locations were therefore examined as part of a risk assessment and no high residual risks were found.

Region Global: Dallas (US), Washington DC (US)

Region EU: Frankfurt (DE) , Amsterdam (NL)

Any transfer of data outside the EU/EEA is made in line with data protection laws. Unless there is another legitimate basis, our international transfers of personal data are based on the EU Commission's standard contractual clauses. By submitting personal data to this site, you are providing explicit consent to the transfer of such data for the fulfilment of their voluntary requests. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient or it may require the recipient to subscribe to international data protection frameworks. For more information about the European Commission's decision on the adequacy of the protection of personal information in countries outside the EEA, please visit: [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

### **Is there anything you can do to further protect yourself?**

You can Improve your security by using Google's 2-step verification when logging in. This will make unauthorized access to your account nearly impossible

### **Security**

Altura Credit Union Limited has implemented industry standards of technology and operational security in order to protect personally identifiable information from loss, misuse, alteration or destruction. Only authorised Altura Credit Union Limited Officers are provided access to personally identifiable information and these Officers have agreed to maintain the confidentiality of this information. The security measures in place for Chatbot and Live Chat are set out in their security documents on their website at

<https://www.livechat.com/legal/privacy-policy/>

### **What rights do you have with respect to your Personal Data?**

For further detail on your rights please see our website Guidance at

<https://www.alturacu.ie/gdpr-and-you>

Altura Credit Union Limited will implement appropriate technical and organisational measures to ensure that the Processing of your Personal Data is performed in accordance with data protection law, in particular ensuring an appropriate level of security. By contacting us (see our contact details above), you may, at any time request confirmation as to whether or not Personal Data concerning you are being processed by us and, where that is the case, you may request access to or receipt of your Personal Data. You may also rectify inaccurate Personal Data concerning you, request that we complete incomplete Personal Data concerning you and request that we erase or to restrict the processing of (certain) Personal Data relating to you. You can also ask that we transmit your Personal Data to another controller or processor; and you can ask that we cease the Processing of your Personal Data.

We will investigate whether it is feasible to respond to your request and whether we are legally obliged to do so. We will give you written confirmation about the chosen way forward. When you no longer want the Chatbot to collect your Personal Data, you can request the deletion of your access to the Chatbot.

You can be assured that we will only use your data for the purpose it was provided through Chatbot 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 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.*

**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 (contact details at the beginning of this Notice). 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. Amendments will not be made retrospectively.

### Contact for Inquiries

We want the Chatbot service 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 your rights set out by this Notice, please contact: Donal O'Connor, 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

Post	Telephone	E-mail
Data Protection Commissioner	+353 (0)57 868 4800	info@dataprotection.ie
Canal House Station Road	+353 (0)761 104 800	
Portarlinton R32 AP23 Co.	1890 252 231	
Laois		

### Any further questions or complaints with respect to the Processing of your Personal Data?

In case you have any questions with respect to the Processing of your Personal Data, you can contact the Data Protection Officer at: [dpo@acu.ie](mailto:dpo@acu.ie). Please note that you have the right to lodge a complaint with the Data Protection Commission at any time (details below) which is the regulator for our processing of personal data, if you are of the opinion that the Processing of your Personal Data by Altura Credit Union Limited infringes the GDPR or other data protection laws.



