

**Privacy Notice of Altura Credit Union Limited
Guarantors**

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 for the purpose of carrying out the abovementioned objectives.

Credit Union Contact Details	
Address	Altura Credit Union Limited
	Mc Dermott Street
	Gorey
	County Wexford
Phone	0539488700
Email	info@alturacu.ie

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

Altura 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 and contact details, payslips and bank statements

Purpose for which we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and Altura Credit Union;
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/ member getting into arrears;
- Collection of the debt; and
- Due Diligence / Credit Checking
- From 2019 (date to be ascertained), the processing of your data may include referral of your data in order to meet reporting obligations to the Central Credit Register

In accordance with the data protection laws, we need a "legal basis" for collecting and using information about you. There are a variety of different legal basis for processing personal data which are set out in the data protection laws. The lawful basis on which we rely in order to use the information which we collect about you, for the purposes set out in this notice will be:

- Using your information in this way is necessary for us to perform a contract between us and the individual you are acting as a Guarantor for.
- Using your information is necessary for us to comply with a legal obligation to which we are subject.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

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. We document the reasons for our retention periods and where possible the retention periods themselves in our Retention Policy. Your details will be held for seven years following default of the borrower, date of demand, discharge, transfer or repayment of the loan. Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

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.alturacu.ie

How we may share the information

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU)¹ and our advisers such as solicitors, debt collectors or auditors. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal data with our Regulator the Central Bank of Ireland as required to comply with the law. The Privacy Notice of the ILCU is available at www.creditunion.ie. We will also share this data with the Central Credit Register from 2019.

Security of Your information

The information that you provide will be stored securely on our systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information. Only relevant members of staff will access the information you provide to us.

Can we use your information for any other purpose?

In limited circumstances we may use your information for a purpose other than those set out in this Notice. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

Our use of your information

Our legal basis for processing personal data supplied by you for the purpose of this guarantee is in furtherance of this contract and the contract with the member. Due Diligence may be conducted to ensure prudent lending standards of Central Bank and in accordance with our policy on lending. Searches may be conducted such as Judgement or Bankruptcy Searches.

¹The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring (audit) services to affiliated credit unions. We may disclose information in the guarantee form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us.

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 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 data. 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 data. 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.*

You have a **right to complain** to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone +353 (0)1 7650100
Free Phone Number 1800 437 737
E-mail info@dataprotection.ie

Postal Address: Data Protection Commissioner
21 Fitzwilliam Square South
Dublin 2, D02 RD28. Ireland

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 data, 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 at Altura Credit Union** 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 data. If you wish to avail of either of these rights, please contact us at the Data Protection Officer Contact Details at the top of this document