

Privacy Notice of the Irish League of Credit Unions (ILCU)

The Savings Protection Scheme (SPS) ROI & NI

Background

The ILCU is a trade and representative body for credit unions in Ireland and Northern Ireland. We provide 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.

The ILCU operates a **Savings Protection Scheme (SPS)** which provides support, financial or otherwise to assist affiliated credit unions under the administration of a sub-committee of the League board. This support can include assistance to credit unions undertaking a transfer of engagements or on a standalone basis to help credit unions trade out of difficulty. In providing SPS support, the ILCU enters into certain funding agreements with the credit union.

As part of the operation of the SPS, the League has a **monitoring function**, whereby representatives of the League will engage with our member credit unions to help ensure the safety and soundness of the credit union.

The ILCU is committed to respecting the rights of those people whose data we process and this notice is provide transparency and information about the processing of personal data necessary for the operation of the SPS scheme.

Whose personal data do we process?

Members of affiliated credit unions

Monitoring Function

What personal data is processed and why

Representatives of the ILCU when carrying out a monitoring visit may **view** the below data when in the credit union.

- Your name, address, date of birth, email, telephone financial data, status and history, transaction data; contract data, details of the credit union products you hold, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, passport details, interactions with credit union staff and officers on the premises, current or past complaints, credit history information (including credit scores).

The purpose of viewing this information is in order to assess the financial position of affiliated credit unions and to assess compliance with legal and regulatory obligations in order to support the operation and the stability of the credit union. A report is then prepared for the credit union. No personal data is removed from the credit union by ILCU representatives.

SPS Support

What personal data is processed and why

Where the credit union is in receipt of SPS support, it may be the case that your personal data will be processed by the ILCU i.e. your number, account number and details in relation to your indebtedness with the credit union and circumstantial information relating to your ability to make repayments.

The purpose of processing this data is to enter into funding arrangements with the credit union to record debts included within the SPS funding agreements.

- To provide instructions in relation to debt recovery including recording the legal recourse taken if applicable
- To liaise with the credit union in relation to the debt.

Lawful Basis of our processing

Contract

The ILCU operates in line with the Rules of the Irish League of Credit Unions which is a contract between the ILCU and affiliated members and also the Rules of the SPS by which we and affiliated credit unions are bound. Affiliated credit unions and its members are also

bound by the Standard Rules for Credit Unions. The League Rules, the SPS Rules and the Standard Rules all include an obligation on credit unions to participate in the SPS and to permit authorised representatives to conduct monitoring visits.

Legitimate Interest

Both monitoring and the SPS scheme are to;

- Ensure stability of affiliated credit unions for the benefit of the members
- To protect the reputation of the credit union movement
- To prevent recourse to the Deposit Guarantee Scheme
- To recoup monies to the SPS to maintain the level of funding in the SPS for the benefit of all member credit unions

Retention

In the case of our monitoring function we do not retain any personal data. Where a credit union has received SPS support we shall retain your personal data for no longer than seven years from the date of satisfaction of the debt.

Complaints

The Monitoring Department of the ILCU also administer any complaints received by members in an effort to resolve same between the member and credit union where possible. In some cases it is not appropriate for the ILCU to engage directly with the member in which case the member will be referred to the appropriate credit union. In the case of such complaints any personal data received by the ILCU which is not necessary to the complaint will be redacted from your correspondence.

Your Rights



To access your data. This is a right 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 the data**. You are also entitled **to further information about the processing**.



To correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate about you rectified.



To erasure of your personal data in certain circumstances. You can 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).



To object to processing of your personal data where a legitimate interest is relied on. You also have the right to object to processing for direct marketing purposes, including profiling for direct marketing.



To restrict our processing of your personal data. You can ask us to suspend processing of personal data about you, in certain circumstances for example if you want to challenge the legality of processing.



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.**



To **portability** of your data. You can request a copy of your personal data that you have provided to us to be sent to you (or another where technically feasible) in an electronic, **reusable format**;

You also have a right to complain to the relevant Regulator about any of our processing.

<p>ROI: Data Protection Commissioner Telephone: Lo Call Number 1890 252 231 Email: info@dataprotection.ie or Postal Address: Data Protection Commissioner, Canal House, Portarlinton, R32 AP23 Co Laois</p>	<p>NI: Information Commissioners Office Telephone: 028 9027 8757 or 0303 123 1114 Email: ni@ico.org.uk Post: ICO, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB</p>
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Point of contact for your queries

The ILCU has appointed a Data Protection Officer who can answer your queries and respond to your requests in respect of any of your rights. Please contact in writing Data Protection Officer, ILCU, 33-41 Lower Mount Street, Dublin 2 or email info@creditunion.ie marked for the attention of the DPO.