



Privacy Statement

At Link Credit Union, we are fully committed to protecting and respecting our members' privacy.

This statement sets out essential information about the personal data we collect from you, how we use and safeguard this information, who we share it with and why, and how long we will keep it on file.

Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

We are a Data Controller for the purposes of the Data Protection Acts 1988 and 2003 ("the Acts") and the General Data Protection Regulation ("the GDPR") which takes effect from 25th May 2018.

Identity

If you are concerned about how your personal data may be processed in this context, please contact our Data Protection Officer (DPO) by phone on 042 9675000, by fax on 042 9653592, by email at collette@linkcu.ie or by post to Link Credit Union, Main Street, Bailieboro, Co Cavan. Also, if you have any questions or comments regarding this privacy statement, please contact us in any of the aforementioned ways.

Information Collection

In using this web-site, we will only ever ask you for personal information in response to a request from you for one of our products and services and we undertake to retain this information for no longer than is necessary for the purpose for which it was obtained. The purpose of the request for information will be apparent from the type of transaction being initiated by you.

We will collect and process the following personal data relating to you:

- Information provided at the time of opening your account or submitting a loan application;
- Information that you or others provide by completing forms via our website or which you or they otherwise provide to us (including personal details such as your marital status);
- Information relating to your financial details/circumstances;
- Any instructions we accept from you or transactions we undertake to which you are a party, whether through our website, or otherwise;
- Information you have consented to us using;
- Other personal information such as: CCTV images at our offices;
- Records of any correspondence as a result of you contacting us;
- Telephone calls may be recorded to verify your information, for purposes of staff training, to demonstrate regulatory compliance and for quality assurance purposes;

- Information about your computer, including where available, your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Sometimes we may process your personal information even if you are not our member. For example, you may be a nominee on an account, a guarantor, or a third party acting on behalf of one of our members. You could also be a potential member applying for membership of the credit union.

Purpose of Data Collection

We use the information we collect and hold about you as follows:

- to provide credit union and other related services, products and facilities to you;
- to assess eligibility and qualification for the services, products and facilities we offer;
- to implement any contracts we have entered into with you; and
- to conduct credit searches with credit reference agencies in order to provide credit facilities and, where necessary, for fraud prevention and debt recovery.

We may also use your information to notify you about changes to our services to which you have subscribed or to provide you with information about products or services that you request from us or, where you have agreed to us doing so, which we feel may interest you.

We may use anonymised or statistical information to analyse our website and services to make improvements or other adjustments to them.

The legal basis for retaining and/or processing your personal data

We use and share your information where:

- You have provided us with explicit consent to use that information in a specific way (you have the right to withdraw your consent at any time. See 'Your Rights' section below.);
- It is required for us to provide a service to you or in the completion of a contract you have entered into with us. This may also arise in the context of our responding to a request from you so that you can enter into a contract with us (e.g. a loan offer);
- We are required to do so to comply with a legal obligation (e.g. the performance of a contract, to comply with the requirements of the Criminal Justice legislation & regulation in respect of anti-money laundering/the combatting of the financing of terrorism/UN financial sanctions, reporting credit information to the Central Credit Register, reporting to the regulatory authorities, the Revenue Commissioners and law enforcement);
- Its use is required to protect your "vital interests" in exceptional circumstances;
- Its use is required for our legitimate interests, in the course of managing our business including credit risk management, providing service information, conducting marketing activities, training and quality assurance, strategic planning and the purchase or sale of assets.

How we use automated processing:

We may analyse your personal information using automated means to help us to :

- Understand your product and service needs from us;
- Offer you product and service information we believe may be of interest to you (we carry out profiling by analysing your demographic and user status, channel preferences and location, in order to identify potentially useful services for you. We also use this to design future services offerings and to ensure that any marketing or educational materials we send you are relevant and useful to you.
- We use an element of automated decision-making for loan-assessment, provisioning and anti-money laundering purposes and to ensure we comply with our legal obligations in those regards

Who we share your information with:

Sometimes we share your information with third parties. We expect these third parties to have the same levels of information protection that we have, and we expect that they provide sufficient guarantees that the necessary safeguards and controls have been implemented to ensure there is no impact on your data rights and freedoms.

- We share your personal information with persons or companies with whom we do business and who provide products or services e.g. IT Services that we use in conducting our business, including managing our relationship with our members.
- Similarly, we may share or disclose personal data to professional advisers, e.g. legal advisers, accountants, auditors, whom we may engage for any reasonable purpose in connection with our business, including assistance in protecting our rights.
- We will only share or disclose to these parties the information that they need in order to provide the products or services and will expect those parties to ensure that the information is always adequately protected.

Irish League of Credit Unions (ILCU) Affiliation: The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides 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. As this credit union is affiliated to the ILCU, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information in your application or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

- The Privacy Notice of ILCU can be found at www.creditunion.ie
- The ILCU Savings Protection Scheme (SPS): We may disclose information in any application from you or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS.

- For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), the Credit Union is a participant of CUSOP (Payments) DAC (“CUSOP”). CUSOP is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. CUSOP is an outsourced model engaging third party companies, such as a Partner Bank, to assist with the processing of payment data.
- Insurance: As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. To administer these insurances we may pass your information to ECCU and it may be necessary to process ‘special category’ personal data about you. This includes information about your health which will be shared with ECCU for the purposes of our life assurance policy to allow ECCU to deal with insurance underwriting, administration and claims on our behalf.
- We also have to share information with third parties to meet any applicable law, regulation or lawful request including dealing with complaints. For example, we have a legal obligation under the “Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008” to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.
- In all such cases, we will only disclose the minimum amount of information required to satisfy our legal obligation.

[How long we hold your personal data for](#)

To meet our legal and regulatory obligations, we hold your information while you are a member and for a period of time after that. We do not hold it for longer than necessary. To help you understand how long we hold your data for, we have summarised our internal retention schedules below.

Please note that these retention periods are subject to legal, regulatory and business requirements, which may require us to hold the information for a longer period. For example, we must meet minimum retention standards for taxation and audit requirements.

To meet such needs and to protect your interests as well as the credit union’s interests, we may need to hold data for longer than our internal schedules dictate. However, we will not retain data that is no longer needed, and we continuously assess and delete data to ensure it is not held for longer than necessary.

Document Type	Example Document	Retention Period
Account and service information	Membership account opening documents including: <ul style="list-style-type: none"> ○ Documents that identify and authenticate you, e.g. birth certificate, passport, proof of address ○ Signed authorisation for deduction at source, standing order or direct 	At least 6 years beyond account closure or the member’s death

	<ul style="list-style-type: none"> debit <ul style="list-style-type: none"> o Documents that are required for adherence to law or regulations, e.g. PPSN, copy of marriage certificate / civil partnership 	At least five years after the relationship with the member has ended.
	<ul style="list-style-type: none"> • Account operation records including instructions, communications and complaints <ul style="list-style-type: none"> o Bank details; IBAN o Transactions and receipts o Accounting records • Loan application information is retained for a period of [six/seven] years from the date of discharge, final repayment, transfer of the loan. 	<p>At least 6 years beyond completion of the transaction or contract or resolution of the complaint concerned</p> <p>At least 6 years beyond the expiry of the loan whether by repayment, refinance, transfer or default</p>
Other records	<ul style="list-style-type: none"> o Records relating to legal claims o CCTV footage and voice recordings 	<p>At least 6 years beyond closure of the case</p> <p>One month</p>
Revenue/Tax documentation	<ul style="list-style-type: none"> o Income tax and DIRT records 	At least 6 years beyond completion of the transaction concerned

Where We Store Your Personal Data:

it is possible that some of the information we hold about you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers or someone else. For instance, if it is necessary to do so to complete a transaction, your personal information (e.g. name and account details) may be sent to a third party or one of our contracted suppliers outside the EEA.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy statement.

Security

We at Link Credit Union take our data protection responsibilities very seriously. All information you provide to us through this website is stored on secure servers. We employ appropriate physical and technical security measures including staff training and awareness, to prevent unauthorised access to, or alteration or destruction of your personal data in our possession and we will review these measures regularly.

You must keep your PIN, Password and Username, and any other security device we give you, safe and secure. We will never initiate a request for this information.

You should log off your online account when finished using it.

The use of the internet, by its nature, is not always secure. As a result, while we have reasonable IT security measures in place, we cannot guarantee the security or privacy of communications made over the internet.

You are responsible for providing all you require to safely and properly access and use our web site and the associated services including a computer, an internet connection and security software.

Disclosure

We will only disclose information submitted to us through this web site in the proper conduct of credit union business on your behalf. Such disclosure may include information required by our internal auditors, external auditors, credit referencing agencies, debt management service providers, IT service provider, legal advisors or regulators such as, the office of the Data Protection Commissioner or the Central Bank of Ireland.

Right of Access

You have a right to a copy of your personal data held by this credit union. Therefore, you may at any time submit a written Subject Access Request to Link Credit Union by post, fax or email. The credit union will reply to your request within 1 month of receipt of the written or emailed request.

A Data Access Request should be addressed to the Data Protection Officer and must include sufficient details to identify the person concerned and to help locate all relevant information.

Right of Rectification or Erasure

You have the right to have your personal information corrected, if inaccurate, or erased, if the credit union does not have a legitimate reason for retaining that information. We do however need you to submit a written request for such rectification or erasure by email, fax or post, providing sufficient details for us to identify the person and data concerned.

Marketing

You have the right to ask us not to process your personal data for marketing purposes. We will request your consent (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking the appropriate boxes on the forms we use to collect your data. You can

also exercise the right to withdraw your consent at any time where processing is based on consent by contacting us at collette@linkcu.ie.

With the introduction of the GDPR with effect from 25th May 2018, you also have the following rights:

- To object to the particular use of your personal information for our legitimate business interests;
- In certain circumstances, to have your personal information deleted or our use of your information restricted;
- In certain circumstances, to not be subject solely to automated decision making and where we make such automated decisions, you have the right to have a person review the decision;
- To data portability (i.e. to have access to a transferable copy of the personal information we hold to transfer it to another service provider).

Cookies

Cookies are small text files that are sent to and stored on your computer, smartphone, tablet or other device for accessing the Internet, whenever you visit a website or use on-line apps. This website uses cookies to collect information. By using our website (through any device) you agree to the use of cookies in addition to any other terms and conditions which may apply.

Our use of cookies may be subject to change from time to time. Any such changes will appear here and become effective immediately. Your continued use of our website is taken as meaning that you agree to any such changes.

Cookies do not in any way compromise the security of your computer. You can continue to use this website with no loss of functionality if you choose to disable cookies on your computer.

To ensure your cookie settings are to your preference you should modify your personal browser preferences. More general information on cookies can be found on aboutcookies.org. This includes information on how to disable cookies.

Technical details relating to visits to this website are logged by our internet service provider for our statistical purposes.

How we use Cookies

Linkcu.ie uses cookies to collect information about visitors' use of the website, including things like connection speed, operating system details, the time and duration of visits and IP addresses. The information collected by cookies enables us to understand the use of this site, including the number of visitors it has, the pages viewed per session, time exposed to particular pages etc. This in turn helps to provide visitors with a better experience. Link Credit Union will not attempt to personally identify visitors from their IP addresses.

Linkcu.ie uses *Functional Cookies* where its main purpose is to allow our website to remember choices you make and provide enhanced more personal features (examples would include preferred language, keeping track of progress when filling in online application forms).

How to manage and disable cookies?

For more information about how to manage cookies, including opting-out of different types of cookies please visit: <http://www.aboutcookies.org>

You can also find more information about how to opt-out of targeting cookies by visiting: <http://www.youronlinechoices.com>

[Changes to our Privacy Statement](#)

Any changes we may make to our privacy statement in the future at our sole discretion, will be posted on this page from time to time.

[Disclaimer](#)

We shall not be liable in respect of any claims, emergencies, demands, causes of action, damages, losses, expenses including without limitation, reasonable legal fees and costs of proceedings arising out of or in connection with the use and/or dissemination of personal information relating to you in accordance with this privacy statement and your consents.

[Links](#)

You should be aware that where you link to another website from ours, that we have no control over that other website. We have no responsibility for the privacy practices of other websites and Link Credit Union recommends you consult the privacy information on those sites.

[Google Analytics](#)

We use Google Analytics to collect anonymised tracking data including the pages you have visited, the amount of time spent on each page, the website you have come from before visiting this website, your location (country and/or region) and other non-personal information.

Contact us

Questions, comments and requests regarding this privacy statement are welcomed which you can send to collette@linkcu.ie

If you wish to exercise any of your data protection rights, you can contact us via any of the mechanisms outlined in the 'Identity' section of this statement.

If you are unhappy with how the credit union has handled your personal data, you may address your complaint in writing to the Complaints Officer, Link Credit Union, Main Street, Bailieboro, Co Cavan. Your complaint will be handled through our Complaints Handling Procedure and if you remain unhappy with the outcome of this process you have the right to complain to the Data Protection Commission or another supervisory authority. The Office of the Data Protection Commissioner may be contacted at:

Telephone: +353 (0)761 104800 or Lo Call Number 1890 252 231

Fax: +353 57 8684757

E-mail: info@dataprotection.ie

Postal Address: Data Protection Commission, Canal House, Station Road, Portarlinton, R32 AP23, Co Laois.

Link Credit Union is regulated by the Central Bank of Ireland.

Date: May 2018