

LENDING AGREEMENT PRIVACY NOTICE

PSCU, also known as Public Service Credit Union, is a member owned financial co-operative for current and former public servants and their families where our members save and borrow with us along with accessing other financial services. PSCU is regulated by the Central Bank of Ireland. This Privacy Notice describes how we collect and use personal data about you during and after your relationship with us.

We are committed to protecting the privacy and security of your personal information and take our responsibilities under applicable data protection law, including the EU General Data Protection Regulation ("GDPR") and implementing legislation such as the Data Protection Act 2018 very seriously.

Please note that this Lending Privacy Notice provides for how we process your personal data in order to process loan applications, provide services to you and other general purposes. If you apply for a loan, you will be provided with our Lending Privacy Notice to take account of further processing that may be necessary.

Our contact details are:

Address: St. Stephen's Green House, Earlsfort Terrace, Dublin 2, D02 PH42
Phone: 01 6622 177
Email: dpo@pscui.ie

What personal data do we use?

We need all the categories of information in the list below to allow us to identify you, contact you, comply with our legal obligations and in order that we perform our contract with you.

Some of the grounds or legal bases for processing will overlap and there may be several grounds which justify our use of your personal data. We may collect, store, and use the following categories of personal data about you:

Name	Address and previous addresses
Accommodation status	Date of birth
Telephone	Email
Country of residence	Nationality
Country of birth	Spouse/partners
Financial data such as status, outgoings and history	Transaction data/ financial statements
Contract data	Details of the credit union products you hold with us
Signatures	Identification details on documents such as passport, driving licence, birth certificate
Source of wealth	Salary
Occupation/grade	Source of funds
Beneficial Ownership Status	Politically Exposed Status

Mortgage details	Tax identification/PPS numbers
Tax residency	Nominations
Relationship to other borrowers	Number of dependents
Credit history	Life assurance details
Details from credit referencing agencies	Retirement age
Interactions with credit union staff and officers on the premises by phone, email, current and past complaints	CCTV footage, telephone voice recordings

For mortgage applications, we may require additional information and documentation such as legal title documents for a property, valuation reports, revenue documentation, legally binding agreements or court orders where applicable and source of funds support information such as Confirmation of Gift letter and bank statements.

We may also use your personal information to make you aware of products and services which may be of interest to you where you have consented to us doing so and in accordance with your preferences. You can withdraw your consent at any time by using PSCU's contact details as provided above.

How we use sensitive personal data

We need to have further justification for collecting, storing and using special categories of sensitive personal data and will only collect such data in limited circumstances with your explicit written consent. We may also collect, store and use special categories of more sensitive information in the event that you apply for a loan, where we need to carry out our legal obligations and where it is needed in the public interest and in line with our data protection policy. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests or someone else's interests and you are not capable of giving your consent or where you have already made the information public.

You will be asked for your consent to process this special category of sensitive:

- Information about your health, including any medical conditions and sicknesses.

Purpose for which we process your personal data

We gather and process your personal information for a variety of reasons and rely on a number of different legal bases to use that information, for example, we use your personal information to:

Assess your loan application and determining your creditworthiness for a loan
Verify the information provided by you in the application
We are obliged to purchase loan protection and life savings protection from ECCU
Conducting credit searches and making submissions to the Central Credit Register
Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan

Meeting legal and compliance obligations and requirements under the Rules of the Credit Union
To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower
Providing updates on our loan products and services by way of directly marketing to you
To help administer your products and services
To contact you in respect of your account and any product or service you avail of
To verify the information provided by you in the application
To prevent authorised access to your account
To meet our legal and regulatory obligations, for example our anti-money laundering and terrorist financing (“AML/CFT”) beneficial ownership register (“BOR”) and Central Credit Register (“CCR”) requirements.

Our use and sharing of your information

We will collect and use relevant information about you, your transactions, your use of our products and services and your relationships with us. We rely on the following purposes, also known as the legal bases for processing personal data. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data:

Fulfilling a contract

This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you.

Security	In order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or personal assets
Guarantors	As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that the credit union ensures the repayment of your loan. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we will give them details of the outstanding indebtedness. If your circumstances change, it may be necessary to contact the guarantor
Credit assessment	<p>When assessing your loan application, the credit union will take a number of factors into account and will utilise personal data from:</p> <ul style="list-style-type: none"> Your application form or as part of your loan supporting documentation Your existing credit union file Credit referencing agencies such as the Irish Credit Bureau and the Central Credit Register <p>The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit union’s lending policy</p>

Mortgages	<p>Where you obtain a home loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf. The credit union uses the Credit Union Development Association (“CUDA”) System for Application Management (“SAM”) software for the assessment, documentation and workflow management of mortgage applications and for compliance with ESIS, MARP and other requirements. This IT service is an outsourced service provided by Target Integration Ltd. which transfers data to Target Integration Consultancy Pvt. Ltd which is located in a third country. Target Integration Ltd. has Standard Contractual Clauses (“SCCs”) in place. See Third Parties information below.</p>
Third parties	<p>We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with data protection law.</p> <p>The credit union shares personal data with government and state bodies to facilitate payroll deduction where members opt to deduct savings and/or loan agreements from source.</p>
Administrative purposes	We will use the information provided by you, either contained in this form or any other form or application, for the purpose of assessing loan applications, processing applications you make and to maintain and administer any accounts you have with the credit union
Irish League of Credit Unions (“ILCU”) Affiliation	<p>We will use the information provided by you, either contained in this form or any other form or application, for the purpose of assessing loan applications, processing applications you make and to maintain and administer any accounts you have with the credit union</p> <p>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, guidance, 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 (by which the credit union is bound to the ILCU). 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.</p> <p>The Privacy Notice of the ILCU can be found at www.creditunion.ie</p>

The ILCU Savings Protection Scheme (SPS)	<p>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.</p> <p>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 Payac Services CLG ("PAYAC"). PAYAC is a credit union owned, independent, not-for-profit company that provides an electronic payments service platform for the credit union movement in Ireland. PAYAC is an outsourced model engaging third party companies, such as Danske Bank, to assist with the processing of payment data.</p>
Insurance	<p>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. Further information can be found in our lending privacy notice.</p>
Card Payment Services	<p>If you use our electronic payment services to transfer money into or out of your credit union account or make payments through your debit card into your credit union account, we are required to share your personal data with our electronic payment service provider.</p> <p>If we issue you a debit card, Transact Payments Malta Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their privacy policy which is available at http://currentaccount.ie/files/tpl-privacy-policy.pdf</p>
Member service	<p>To help us improve our service to you, we may use information about your account to help us improve our services to you.</p>

Legal Duty

This basis is appropriate where we are processing personal data to comply with applicable law.

Credit Reporting	<p>Where a loan is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry to the Central Credit Register ("CCR") in respect of the borrower. Where a loan is granted in the sum of €500 or more, the credit union is obliged to report both personal details and credit details of the borrower, and guarantor where applicable, to the CCR</p>
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House Loan	<p>Where you obtain a house loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf</p>
Connected/ Related Party Borrowers	<p>We are obliged further to Central Bank regulations to identify where borrowers are connected in order to establish whether borrowers pose a single risk. We are also obliged to establish whether a borrower is a related party when lending to them, i.e. whether they are on the Board/ Management team or a member of Board/ Management team's family or a business in which a member of the Board/ Management team has a significant shareholding</p>
Purpose of the loan	<p>We are obliged to ensure that the purpose for the loan falls into one of our lending categories</p>
Regulatory and statutory requirements	<p>To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. An example of this is our legal obligation to file reports on the Central Credit Register in accordance with the Credit Reporting Act 2013. For the same reason, we will also hold the information about you when you are no longer a member. We may also share information with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman if required by law. The credit union is also required to record all arrears support unit telephone calls made by the credit union or received by the credit union in relation to pre-arrears or arrears situations under the Code of Conduct for Mortgage Arrears.</p>
Compliance with our anti-money laundering and combating terrorist financing obligations	<p>The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013, the Criminal Justice (Money Laundering and Terrorist Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2021. This will include filing reports on the Beneficial Ownership Register, the European Union Cross-Border Payments Reporting ("CESOP") and the Ireland Safe Deposit and Bank Account Register ("ISBAR"). These reporting obligations require the credit union to submit certain member data to the relevant authority administering the registers, such as the Central Bank of Ireland or the Revenue Commissioners. For further information, please contact us on the contact details provided.</p>
Audit	<p>To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external auditor. We will allow the external auditor to see our records (which may include information about you) for these purposes.</p>

Legitimate Interest

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Credit assessment	When assessing your application for a loan, as well as the information referred to in credit assessment, the credit union also utilises credit data from credit referencing and credit assessment agencies such as CRIF and the Central Credit Register ("CCR").	Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency we will pass them your personal details and details of your credit performance.
Debt collection	Where you breach the loan agreement we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they make contact with you and details of the indebtedness in order that they recover the outstanding sums. We may use a private investigator in order to locate you in the event that you fail to make repayments on your loan and or fail to make contact with the credit union.	The credit union, where appropriate, will take steps to recover a debt to protect the assets and equity of the credit union.
Judgements Searches	We may carry out searches in Stubbs Gazette in order to assess your credit worthiness to repay a loan.	The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. In carrying out such a search we can better determine your overall financial position in order to lend to you.
CCTV	We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for the prevention and detection of crime or disorder apprehension and prosecution of offenders, provision of evidence in criminal proceedings, interest of member, public and employee safety, protection of property and assets	With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff /volunteers/members or visitors to the credit union and to prevent and detect fraud.
Telephone voice recordings	We record phone conversations both incoming and outgoing for the purpose of: <ul style="list-style-type: none"> • verifying information and quality of service such as verification of members instructions in case of dispute in relation to an order or instruction, verification of verbal instructions from members with regard to marketing preferences in case of dispute, to support investigation of complaints and tracking of reported problems, to verify and validate instructions given when setting up direct debit facilities. • Facilitating staff coaching and training, recordings may be provided as evidence in disciplinary matters • For internal and external audit or investigations conducted by regulators and the Financial Services and Pensions Ombudsman ("FSPO") • Call recordings may be reviewed as part of data protection audits or related credit union governance activities 	To ensure a good quality of service, to assist in training, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolves any disputes.

Your consent

We will only carry out processing which is based on your consent and will cease processing once you withdraw such consent. We rely on your consent to process your personal data for the following purpose:

Marketing & Market Research	To help us improve and measure the quality of products and services we undertake market research from time to time. This may include using the Irish League of Credit Unions and/specialist market research companies.
Account Information Service	CRIF Realtime Ireland (CRIF) is an 'Account Information Service Provider' or AISP. An authorised AISP can ask for permission to access bank account data and use information to provide a service. In this case the service would be to verify your income details and recent transactional data. CRIF is authorised by the Central Bank of Ireland and licenced to operate in the Republic of Ireland.

Guarantors

For guarantors, we may collect, store and use the following personal data about you: Your name, contact details, address, date of birth, proof of identification and address documents, signature, employment details, income, occupation, employer, credit union transactional data, financial data, status and credit history, financial information such as outgoings, bank statements, details from credit reference agencies on other loans/debts held by you, telephone voice recordings.

Purpose for which we process guarantor personal data

We process the above personal data for the following reasons:

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the 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
- Conduct due diligence/credit checking
- To meet reporting obligations to the Central Credit Register

Profiling

We may sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loans assessment, provisioning and anti-money laundering purposes and compliance with our legal duties in those regards. We may also carry out profiling in order to tailor our marketing to you.

When assessing your loan application, the credit union will take a number of factors into account and will utilise personal data from:

- Your application form or as part of your loan supporting documentation
- Your existing credit union file
- Credit referencing agencies such as the Irish Credit Bureau and the Central Credit Register

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit union's lending policy.

Automated Decision Making

The Credit Union sometimes uses automated decision making to enable us to deliver decisions within a shorter time frame and to improve the efficiency of our processes. An example of where we may use automated decision making is as part of our credit

decision process, which involves assessing your application for credit, taking account of your current circumstances and evaluating your ability to meet the required repayments. The decision process takes into account different types of information, for example: information you have provided in your application such as the amount requested, the repayment period, your income, employment details, credit history with credit reference agencies such as the Central Credit Register and details of other credit facilities you may have such as loans, overdrafts and credit cards. The Credit Union uses this information to apply internal credit assessment rules in a consistent manner. This ensures that your application for credit is treated fairly, efficiently and that we believe you can afford the required repayments. We review the automated credit decision making process on an ongoing basis to ensure that it remains fair, efficient and unbiased in order to better serve our members. Automated decision making is only used to approve loan applications. Automated decision making is never used by the Credit Union to decline loan applications.

If you fail to provide personal data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.

Updates to your personal information

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us at the contact details provided.

Third Party Services Providers

We may transfer your data to third party services providers who we engage to provide services to us such as IT service providers, professional advisers, auditors, credit control agencies, competent regulatory authorities such as the Central Bank, Revenue Commissioners and other bodies as requested or required by law, digital marketing and analytics service providers.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be controllers in their own right. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations.

Change of purpose

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

Cookies

We may obtain information about your general website preferences by using a cookie file which is stored on your browser or the hard drive of your device. Cookies are small pieces of information, stored in simple text files, placed on your device by a website. Cookies can be read by the website or the App on your subsequent visits so that you can access information in a faster and more efficient way. Generally speaking, cookies do not contain personal data from which you can be identified, unless you have separately furnished such information to the website. Some of the cookies we use are essential for the website to operate.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This information is used for loan-assessment, provisioning and anti-money laundering purposes and compliance with our legal duties in those regards. We may also carry out profiling in order to tailor our marketing to you.

How long do we keep your data for?

We need to keep your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above) but will not hold on to it for any longer than is necessary. Even when you close your account with us, we must retain some of your personal information in order to comply with legal and regulatory requirements and in case of claims. 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. Where possible we record how long we will keep your data. Where that is not possible, we will explain the criteria for the retention period. Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below:

Accounting records required to be retained further to the Credit Union Act 1997 (as amended) must be retained for not less than 6 years from the date to which it relates
Transaction records must be kept for 5 years after the relationship with the member has ended under the provisions of the Criminal Justice (Money Laundering & Terrorist Offences) Acts (as amended)
Income tax records are required to be kept for 6 years after the completion of the transactions to which they relate
Loan application information is retained for a period of 7 years from the date of the final repayment, discharge or transfer of the loan
Credit agreements are retained for a period of 7 years from the date of expiration of or breach and 12 years when the document is under seal
CCTV footage which is used in the normal course of business (i.e. for security purposes) is normally retained for a period of 1 month
Telephone recordings are retained for a period of 12 months except for resolved member complaints which are retained for a period of 1 month after the date of resolution

Data Transfers

Data may be transferred from us to the UK which is a third country for the purposes of EU GDPR. The data is transferred on the basis of an adequacy decision by the EU in respect of the UK.

Data may be transferred to other third countries where the credit union relies on third party providers to facilitate account maintenance, lending services, credit control, payment services and any other necessary service. We will only transfer your information outside if the EEA where the same standard of data protection applies or appropriate safeguards are in place such as Standard Contractual Clauses ("SCCs"), Binding Corporate Rules ("BCRs") or an EU adequacy decision has been made in respect of the relevant third country.

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.pscu.ie or you can ask us for a copy.

Your rights under data protection law

You have the following rights under data protection law:

- **To find out** whether we hold any of your personal data and **if we do, to request access** to that data or to be furnished with a copy of that data. You are also entitled to request further information about the processing of that data. You are also entitled to request further information about the processing.
- **To request correction** of your personal data where data held is inaccurate or incorrect.
- **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.
- **Withdraw your consent** to data processing where we are processing your data based solely on your consent. You have the right to withdraw your consent at any time and without incurring a charge.
- **Request that we provide you with a copy of any relevant personal data** in reusable format or request that we transfer your relevant personal data to another controller where it is technically feasible to do so. Relevant personal data is 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.
- **The right to complain to the Data Protection Commissioner ("DPC")** in respect of any processing of your data. Contact details for the DPC are as follows:

Telephone
+353 57 8684800
+353 (0)761 104 800

Lo Call Number
1890 252 231

Web Form:
<https://forms.dataprotection.ie/contact>

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 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 ("DPO") 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 information. If you wish to avail of either of these rights, please contact us at dpo@pscui.ie.