



# Membership Applications Privacy Notice

The data controller is Clonmel Credit Union Ltd

Credit Union House, Parnell Street, Clonmel, Co Tipperary, E91 C622.

Tel: 052 6125292

Email: [admin@clonmelcu.ie](mailto:admin@clonmelcu.ie)

Our Data Protection Officer can be contacted by e-mailing [dpo@clonmelcu.ie](mailto:dpo@clonmelcu.ie), or by post at the address above.

The **purpose of the processing** is to assess an application for membership of the credit union for eligibility. A successful application will result in membership being granted, and the personal data provided will be used to operate the credit union account.

The **legal basis for processing** is for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

As part of your application for membership you'll be asked for your consent on ways that we can contact you for ad hoc mailings and direct marketing purposes.

We will issue obligatory information to you, e.g., AGM notifications, annual accounts and certain reports. You will receive these notifications and links to the accounts via email using the address you have provided.

**Who we share your data with** - sharing of your data can occur with the following:

- staff and officers of the credit union (as necessary)
- persons you have authorised to act on your account
- statutory and regulatory bodies, and law enforcement authorities.
- systems suppliers providing systems support, off-site data backups, testing backup data, etc.
- contractors / processors working for the credit union, such as outsourced printers producing our AGM materials
- our legal advisors, accountants, auditors, and other such professional advisors utilised in the course of our on-going operation.
- suppliers used for checking the names of members against sanctions lists

When sharing information with third parties, we will only disclose the minimum information necessary to perform the needed tasks, or as legally required to be reported. Those contractors we use are subject to a contract requiring at least the same levels of information protection that we have, and they are required to provide assurance that all necessary data protection safeguards and controls are in place.

There are no **transfers of your personal data outside of the EEA, unless you choose to use the identity authentication option when applying on-line.**

**Retention of your data** - In a successful application for membership, in compliance with legal requirements for record keeping, membership application forms, supporting materials, and associated identification validation materials are held for 7 years after the account has been closed.

In the case of an unsuccessful, cancelled or withdrawn application, all personal data will be deleted after a period of 3 months.

**Your rights as a data subject** - you have the right to:

- Data access - find out how we use your information, what information of yours we have, and receive copies of this information
- Rectification or erasure of data - have inaccurate/incomplete information corrected and updated, and, in certain circumstances, to have your information deleted
- Restriction of processing - in certain circumstances, to have our use of your data restricted
- Objection to processing - in certain circumstances, to object to particular use of your personal data for our legitimate business interests (e.g. for direct marketing purposes). You also have the right not to be subject to solely automated decisions, and the right to have a person review such decisions.
- Data portability - exercise the right to data portability (i.e. to obtain a transferable copy of information we hold about you, to give to another provider)

**Processing based on consent** - where our lawful basis for processing your data is your consent to do so, you have the right to withdraw consent at any time. You may do this by dropping into one of our offices, or by writing to, or emailing us.

**Provision of personal data for a membership application** - provision of your personal data for your membership application is a requirement necessary to enter into this contract. Failure to provide the required information means we cannot process your membership application.

**Automated decision making** - we do not use automated decision making in this processing.

**Profiling** - we use anonymised information to create member profiles, grouping individuals with similar characteristics together, to produce statistical information on our membership and on our service provision. This is done to assess service uptake, and for marketing purposes to identify services other members might find useful. You have the right to object to this processing.

**Notification of additional processing** - please note that, if, at some future time, we wish to use the data you are providing for a purpose other than that outlined here, we are obliged to let you know beforehand. Please note that, where this is required or permitted by law, we may process your personal data without your knowledge or consent.

**Updates** - This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be available from our website, the DPO, or the Manager.

**Lodging a complaint** - you have the right to lodge a complaint about your personal data being processed, either with our Data Protection Officer (as above), or directly with the Data Protection Commission, whose contact details are as follows:

|                                                                                                    |                                     |
|----------------------------------------------------------------------------------------------------|-------------------------------------|
| Telephone +353 (0)1 765 0100 / 1800 437 737                                                        | Address: Data Protection Commission |
| E-mail <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>                          | 21 Fitzwilliam Square South         |
| Web: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a> | Dublin 2 D02 RD28                   |

You can find more detailed information on what personal data we process and how we process it in our main Privacy Notice on our website [www.clonmelcu.ie](http://www.clonmelcu.ie)