

# Privacy Notice Aspiring Pilot Loan Scheme

This Privacy Notice applies only to personal data collected for Expression of Interest in the Aspiring Pilot Loan Scheme, a joint scheme between Clonmel Credit Union and Elevate Credit Union. It covers how this data is collected, used, protected and retained at this stage only. It does not apply to any later loan application or lending process. A separate Privacy Notice will be provided if an individual proceeds beyond Expression of Interest.

## Who we are

Clonmel Credit Union and Elevate Credit Union are joint controllers for the Aspiring Pilot Loan Scheme. For the Expression of Interest stage, Clonmel Credit Union, on behalf of both credit unions, collects the personal data needed to record interest in the scheme and to make follow-up contact about that expression of interest only. AFTA will support scheme administration but will not receive any information on the Expression of Interest submissions.

## Joint controller arrangement

In line with Article 26 GDPR, Clonmel Credit Union and Elevate Credit Union have a joint controller arrangement for the Aspiring Pilot Loan Scheme. Both credit unions jointly determine the purpose of processing personal data for the scheme. Clonmel Credit Union is the main contact point for individuals during the Expression of Interest stage.

## How to contact us

If you have a question about this Expression of Interest Privacy Notice, how your information is used for this stage, or how to exercise your data protection rights, on behalf of both Credit Union's you can contact Clonmel Credit Union using the details below.

Clonmel Credit Union Limited, Credit Union House, Parnell Street, Clonmel, Co. Tipperary, E91 C622; telephone 052 6125292; email [admin@clonmelcu.ie](mailto:admin@clonmelcu.ie); Data Protection Officer email [dpo@clonmelcu.ie](mailto:dpo@clonmelcu.ie).

## What happens if we make changes to this notice

The current version of this Expression of Interest Privacy Notice is July 2026 Version 1.00. If this notice changes, the updated version will be made available at [www.clonmelcu.ie/technical-info](http://www.clonmelcu.ie/technical-info) and, where appropriate, may be communicated directly to individuals who completed an Expression of Interest form.

## Who do we collect data about

- Individuals who complete an Expression of Interest form for the Aspiring Pilot Loan Scheme.

## What types of data do we collect

- Full Name, Email Address, Phone Number, Year of Birth, Signature contact consent.

We do not collect special category data for Expression of Interest. We only receive your data directly from you.

### **What are the legal bases we process your data**

The legal basis for follow-up contact at the Expression of Interest stage is consent, where you complete the Expression of Interest form and agree to be contacted about the Aspiring Pilot Loan Scheme. Consent can be withdrawn at any time using the contact details in this notice. Where we are required to use or share Expression of Interest information for legal, regulatory, audit or compliance purposes, the legal basis is compliance with a legal obligation.

### **What are the purposes for processing your data**

- To record your interest in the Aspiring Pilot Loan Scheme.
- To confirm your contact preference.
- To allow Clonmel Credit Union, on behalf of both Credit Unions, to contact you about your Expression of Interest in the Aspiring Pilot Loan Scheme only.
- To manage withdrawal of consent or contact preference where applicable.
- To keep a receipt, retention and destruction record for Expression of Interest forms.

### **How we protect your data**

Expression of Interest information is protected using appropriate organisational and technical measures, including secure handling, restricted access, confidentiality controls, retention controls and secure destruction after 12 months.

### **Automated processing or profiling**

Expression of Interest does not involve profiling. No decision is made about whether you are eligible for a loan under this Privacy Notice.

### **Who we share your information with**

Clonmel Credit Union and Elevate Credit Union are joint controllers for the Aspiring Pilot Loan Scheme. Expression of Interest information is used only for the stated Expression of Interest follow-up purpose among these two credit unions. Both Credit Unions may use approved service providers with secure storage, scanning, IT, data protection or destruction services. Where a provider processes personal data on behalf of the two Credit Unions, an appropriate data processing agreement is in place and the provider must act only on documented instructions.

We may also share Expression of Interest information where required for legal, regulatory, audit or compliance purposes.

### **How long will we hold your information**

Expression of Interest forms will be retained for 12 months only. If an individual later applies for a loan and the Expression of Interest form is required as part of the application record, it will be handled under the separate Privacy Notice and retention basis for the loan application process.

### **Processing your information outside the EEA**

No international transfers are planned for Expression of Interest information.

### **How to exercise your information rights**

You have rights under data protection law, including the right to access your personal data, request correction, request deletion in certain circumstances, restrict processing, object to processing where

applicable, withdraw consent where consent is relied upon, and lodge a complaint with the Data Protection Commission.

For Expression of Interest personal data, data protection rights requests should be directed to Clonmel Credit Union, on behalf of both Credit Unions. Clonmel Credit Union can be contacted at [admin@clonmelcu.ie](mailto:admin@clonmelcu.ie) and [dpo@clonmelcu.ie](mailto:dpo@clonmelcu.ie).

You also have the right to lodge a complaint with the Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963, Ireland, or through [www.dataprotection.ie](http://www.dataprotection.ie).