



# GENERAL PRIVACY NOTICE (LONG FORM)

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 Privacy Notice provides for how we process your personal data in order to open your account, 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: 4-5 Lincoln Place, Dublin 2, D02 XR68  
Phone: 01 6622 177  
Email: dpo@pscui.ie

## What personal data do we use?

We may collect, store, and use the following categories of personal data about you depending on the service being provided:

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 employment details	Transaction data
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	Income
Occupation/grade	Source of funds
Beneficial Ownership Status	Politically Exposed Person (“PEP”) Status
Mortgage details	Tax identification/PPS numbers
Tax residency	Nominations
Relationship to other borrowers	Number of dependents
Credit history – Central Credit Register information	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
IP address	Browser cookies and email meta data
Remittance free text data	Online Session ID
Social media identifiers	Gender

We need all the categories of information in the list above to allow us to identify you, contact you, comply with our legal obligations and in order that we perform our contract with you. For further details on how we process personal data for lending applications, please see our Lending Privacy Notice.

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.

## Purpose for which we process your personal data

We gather and process your personal information for a variety of reasons and we rely on the following purposes, also known as the legal bases for processing 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.

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 this application, processing applications you make and to maintain and administer any accounts you have with the credit union.
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<p>Home Loans</p>	<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.</p> <p>If you apply for a home loan with PSCU, your personal data will be processed and assessed through the CreditLogic Mortgage Online System.</p> <p>CreditLogic processes personal data of mortgage applicants before entering into a home loan agreement. Personal data will be processed for the following groups:</p> <ul style="list-style-type: none"> <li>• Members</li> <li>• Relevant third parties such as: <ul style="list-style-type: none"> <li>• Spouse/ partner</li> <li>• Joint account holders</li> <li>• Recipient of childcare</li> <li>• Outstanding creditors</li> <li>• Recipient of maintenance</li> <li>• Dependent individuals</li> <li>• Builder; developer; engineer</li> <li>• Third party contributions</li> <li>• Solicitor</li> <li>• Insurance advisor</li> <li>• Property valuer</li> <li>• Connected/related party borrowers</li> <li>• Current mortgage lender</li> <li>• Current and past employers</li> <li>• Member's bank</li> <li>• Accountant</li> </ul> </li> </ul> <p>If you apply for or hold an account in joint names or name a dependant, you should only give personal information about someone else with their permission.</p> <p>PSCU is the controller of the personal information we process unless otherwise stated.</p>	<p>Irish League of Credit Unions ("ILCU") Affiliation</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 <a href="http://www.creditunion.ie">www.creditunion.ie</a></p>
	<p>Third parties</p> <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 do so 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. PSCU instructs CustomerMinds to provide a cloud-based communications management tool for targeted personalised communications regarding new memberships, loan applications, newsletters, surveys and marketing campaign analytics.</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>	<p>The ILCU Savings Protection Scheme (SPS)</p> <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 <b>electronic payments</b> 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> <p>Insurance</p> <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> <p>Card Payment Services</p> <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 <a href="http://currentaccount.ie/files/tpl-privacy-policy.pdf">http://currentaccount.ie/files/tpl-privacy-policy.pdf</a>.</p>

SEPA Instant Payments	PAYAC is a credit union payments services provider which has a partnership with Nexi Anti-Fraud service which identifies potentially fraudulent outgoing payments by real time analysis of information relating to a transaction, some of your personal data will be processed by Nexi when you make a SEPA Instant payment. There is an element of automated decision making with this functionality.
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### Legal Duty

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

Tax Liability	We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in another jurisdiction. Where a member is tax resident in another jurisdiction, the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions. Under the Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008, credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.
Regulatory and statutory requirements	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.
Compliance with our anti-money laundering and combating terrorist financing obligations	The information provided by you will be used for compliance with our member due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended). 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.
SEPA Payments	To meet our legal responsibilities under the Payments Regulations, we have implemented a Verification of Payee ("VoP") module provided by Banfico as an anti-fraud tool for both Classic and Instant Payments.

Audit	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.
Nominations	The Credit Union Act 1997 (as amended) allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. Where a member wishes to make a nomination, the credit union must record personal data of nominees in this event.

### Legitimate Interest

A legitimate interest is when we have a business or commercial reason to use your information. If we rely on our legitimate interest, we will tell you what that is.

We rely on the legitimate interest basis to process the following personal data:

**CCTV** With regard to the nature of our business, it is necessary to secure the premises, the property herein and any staff/volunteers/members or visitors to the credit union. The process of this type of processing 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.

**Telephone voice recordings** We retain recordings of our telephone conversations with members to ensure a good quality service, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes, 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 ("FSP0"). Call recordings may be reviewed as part of data protection audits or related credit union governance activities.

### 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.
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### How we use particularly 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:

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

## 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 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 for 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 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 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.

## Credit Assessment

When assessing your application for a loan, as well as the information referred to in the 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").

## 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.

## 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.

## 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 for staff training 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 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.

## Transfers of Engagements

Where your personal data has been transferred to us from another credit union by Transfer of Engagement, the controller of your personal data becomes PSCU. PSCU assumes the responsibilities for processing your personal data upon completion of a Transfer of Engagement and processes your personal data on the grounds outlined in this Privacy Statement.

## 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](http://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.
- **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:

<b>Telephone</b> +353 57 8684800 +353 (0)761 104 800 <b>Lo Call Number</b> 1890 252 231 <b>Web Form:</b> <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a>	<b>Postal Address:</b> <b>Data Protection Commissioner</b> <b>6 Pembroke Row</b> <b>Dublin 2</b> <b>D02 X963</b> <b>Ireland</b>
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**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") in writing 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](mailto:dpo@pscui.ie).