

Elevate Credit Union Limited (ECU)

Elevate Credit Union Limited Website

This Privacy Notice relates to our privacy practices in connection with this website www.elevatecu.ie. ECU fully respects your right to privacy and will not collect any personal data about you on this website without your clear permission. Any personal data which is collected about you on foot of your consent will be held in a safe and secure manner in accordance with the applicable Data Protection Legislation and Regulations. The www.elevatecu.ie website is maintained by Progress Systems Limited Ireland. Our Credit Union is not responsible for the content or privacy practices of other websites.

Any personal information which you volunteer will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts 1988 and 2003 (as amended) and from 25th of May 2018, the General Data Protection Regulation the (GDPR) Act.

For The Data Protection Acts 1988 and 2003 (as amended) and from 25th of May 2018, the General Data Protection Regulation (the GDPR) Act, the Data Controller is Elevate Credit Union Limited.

Our Data Protection Officer for the purpose of the Act is **Mr Seán O'Sullivan** dataprotection@elevatecu.ie.

Other Websites & External links

We are not responsible for the content or privacy practices of any third parties or other websites. Any external links to other websites are clearly identifiable as such. The inclusion of a link on this website does not imply endorsement of the linked website by us.

Collection & Use of Personal Information

DCU does not collect any personal data about you on this website, apart from information which you volunteer. Any information which you volunteer e.g. by contacting us by email, through an online feedback form, instructions for web transactions, is not made available to any third parties (unless you consent to same) and is used by ECU only in line with the purpose for which you provided the information. Your personal data may be anonymised and used for statistical purposes. In certain circumstances, we may be obliged to disclose personal data relating to you to third parties to comply with our legal obligations.

Requests regarding data supplied via this website.

On request, we can supply a copy of your personal data which you may have supplied via this website. If you wish to obtain such a copy, you must write to Elevate Credit Union Limited, West Douglas, Douglas, Cork, or email ECU at info@elevatecu.ie. You should clearly stipulate in the heading of your letter/email that the correspondence relates to a Data Request. You should include any personal identifiers which you supplied earlier via the website (e.g. name, address, phone number, email address).

If you discover that ECU holds inaccurate information about you, you can request ECU to correct that information. Such a request must be made as outlined above in writing or via email.

In certain circumstances you may also request that data which you have supplied via the website be deleted. If you wish to request a deletion, you would be expected to identify some contravention of data protection law in the way ECU processes the data concerned.

Collection and use of technical information

We may obtain information about your general Internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and to deliver a better and more personalised service. Some of the cookies we use are essential for the website to operate.

You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit the website.

Information about your computer may be collected, including where available your IP address, operating system, and browser type, for system administration.

A Cookie Policy specific to ECU online is available on the online login page. To learn more about cookies, visit <http://www.allaboutcookies.org>.

What Information do we collect from you?

- The information we hold about you can vary depending on the products and services you use.
- Any information gathered in respect of transactions on your accounts is retained by Elevate Credit Union Ltd solely for the purpose of operating your account.
- Corresponding with us by phone, e-mail or otherwise. We ask you to disclose only as much information as is necessary to provide you with our services.
- We only ask personal information when applying for e.g. membership or a personal loan. All information provided to us by you will be treated with the utmost confidentiality in accordance with all applicable legislative and regulatory standards.

Why do we collect this Information?

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 process your membership application, to help administer your products and services, to ensure we provide you with the best service possible, to prevent unauthorised access to your account and to meet our legal and regulatory obligations.

We will use this information:

- To set up an account for you as a member on our systems.
- To administer and improve our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep our site safe and secure.

- To deliver information about our financial products and services, where you have subscribed to receive same.
- to assess eligibility and credibility for the services, products, and facilities we offer.
- to analyse our website and services and to make improvements or other adjustments to them using anonymised or statistical 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.
- to conduct credit searches with credit reference agencies to provide credit facilities and, where necessary, for fraud prevention and debt recovery.

The legal bases for the processing of your data are:

1. Processing necessary for the performance of a contract which you have entered with us or to take steps at your request prior to entering a contract.
1. Processing necessary for compliance with a legal obligation to which we are subject.
2. Processing necessary for the purposes of the legitimate interests which we pursue in providing you with our services prior to contract where such interests are not overridden by your interests or fundamental rights or freedoms which require the protection of your information.

Who might we share this Information with?

We may share your information with our IT service providers to provide you with our services. Where an assessment of your credit score is a condition of us entering a contract of a loan with you, we will share information with our selected credit reference agencies.

In addition, we may disclose your personal information to third parties:

- An Garda Siochana. To comply with any legislative and regulatory standards
- Irish Revenue. Duty to disclose information to comply with legal obligations.
- Cloud Service Providers. To store information held by Elevate Credit Union Ltd for legitimate business purposes.
- IT Back-Up Providers. To hold information for our legitimate business purposes.
- Shredding Companies. To ensure confidential materials are removed.
- IT Service Providers. To store data, for IT security and service purposes.
- Email Service Providers. To help us run our business effectively and for legitimate business purposes.
- CCTV. Security and Service issues to help us run our business effectively.
- PaYac (Personal Account Services) will facilitate our Members Personal Account Services and will be a controller of your personal data. To hold information for our legitimate business purposes.

How long do we keep your information?

The time periods for which we retain your information depends on the type of information and the purposes for which we use it. Member's information will be held for six years after an account is closed by our credit union to meet regulatory and audit requirements.

Please see our Data Retention Policy for further details.

How do we keep your information safe?

We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. We protect your information with security measures under the laws and regulations that apply, and we meet international standards (ISO27001). We keep our buildings, computers, and files always secure. When you contact us to ask about your information, we will ask you to identify yourself. This assists us in protecting your information.

How do we use personal information for direct marketing?

From time to time, we would like to make you aware of other products and services that we offer which may be of interest to you. We can do this by using some of the personal information we hold about you. You have a right not to receive such information. You can amend your marketing preferences at any time by contacting us at the address below.

Cookies

We may obtain information about your general Internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. Cookies do not in any way compromise the security of your computer. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can "remember" you on your return visit. 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. For more information on how to manage cookies, including how to disable cookies please visit: www.aboutcookies.org

Complaints about data processing via the website

If you are concerned about how personal data is processed via this website, please do not hesitate to bring such concerns to the attention of ECU at the contact details below.

Should you have a complaint or wish to make an Access Request - which you are entitled to make under the Data Protection Acts - you can contact either the email above for general complaints or the Data Protection Officer at the above address to make an Access Request. The information contained in complaint files will be kept in line with our Retention Policy. This means that information will be held for six years from the last date of action on the file.

What are your rights with respect to your Information?

You have the following rights:

- The right to access the information we hold about you.

- The right to require us to rectify any inaccurate information about you without undue delay.
- The right to have us erase any information we hold about you in circumstances such as where it is no longer necessary for us to hold the information for your use of our services or if you have withdrawn your consent to the processing.
- The right to object to us processing information about you such as processing for profiling or direct marketing.
- The right to request a restriction of the processing of your information.

Where our processing of your information is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have conducted before you withdrew your consent remains lawful.

We will remove or amend the information as appropriate in accordance with applicable legislative and regulatory requirements.

You may exercise any of the above rights by contacting the Elevate Credit Union Limited DPO, Mr Seán O’Sullivan by email on dataprotection@elevatecu.ie

Current Account Debit Card

If we issue you a debit card, Transact Payments Limited (which is an authorised e-money institution) will also be a controller of your personal data. 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 here <http://currentaccount.ie/files/tpl-privacy-policy.pdf>

What will happen if we change our Privacy Notice?

This Website Privacy Notice is a live document under regular review its contents may change without notice from time to time.

Any changes will be posted on our website and will be effective when posted.

How can you contact us?

If you require further information regarding our Website Privacy Notice you can contact us: by phone: 021 4894555, or by email: info@elevatecu.ie

You may also write to us at: Data Protection Officer, Elevate Credit Union Limited, West Douglas, Douglas, Cork.

Our Data Protection Officer **Mr. Seán O’Sullivan** can be contacted by email.

dataprotection@elevatecu.ie **Overseeing Body**

Should you have an unresolved complaint regarding the use of your personal data you may contact the Office of The Data Protection Commissioner (for ROI members) who has a statutory role in the investigation and adjudication on DP issues.

Details for the DP Commissioner for ROI credit unions are below: Office of the Data Protection Commissioner. 21 Fitzwilliam Square, South Dublin 2, D02RD28
Phone (01) 7650100 or 1800437737 | email dpo@dataprotection.ie