

DETAILED PRIVACY NOTICE

1. Introduction

In order to provide our services, we need to process Personal Data. We are committed to protecting the rights and data protection of individuals in accordance with data protection legislation including the General Data Protection Regulation 2016/679 in Europe (the “GDPR”). This notice sets out details about our processing, should you require further information please contact us using the details at the end of this notice.

2. Personal Data We Collect

Data Subjects

We collect personal information from the following individuals:

- members of our Credit Union
- individuals looking to become members
- individuals who are party to or connected with any of the services we offer our members such as beneficiaries, guarantors, relations or representatives of one of our members
- business contact details including those of our suppliers and partners
- members of the public and non-members who pass by and/or visit the Credit Union and whose images are captured on CCTV or telephone our offices
- users/visitors of our Website, and
- perspective employees of the Credit Union.

Note: Personal Data of employees and volunteers of the Credit Union is dealt with in a separate internal data protection notice.

Depending on your interaction with us and the services you avail of we will collect some or all of the following personal information:

Categories of Personal Data

Category	Details
Identification Data	Name, address, date of birth, PPSN (plus documents giving proof of these details), TIN
Account Data	Gender, marital status, nationality, place of birth, family status, dependents, PEP status, accommodation status, tax residency, related parties, spouse/partner details, marketing preferences
Contact Data	Phone number/s, email address, postal address, previous address/es
Employment Data	Employment status, occupation, salary, social welfare details, pension income, payslips
Financial Data	Transactions, bank account details, payees, balances, source of wealth, source of funds, mortgage details, credit card details, debit card details, current account details, bank statements
Lending Data	CCR records, credit checks, borrowings, arrears details, loan purpose, loan information, guarantor details, income & expenditure data, other loans
Correspondence Data	Emails, letters, phone calls, complaints records
CCTV	Recordings, images
Call Recordings	Recordings of calls made to and from the credit union
Web Data	Online account registration details, login details, browsing history, information relating to how you interact with our website, IP addresses
Special Category Data	Health data, biometric data (online onboarding only)
Competition Data	Entry forms, entry submissions, photos or videos of prize winners
Event Data	Photos or videos taken at events organised by the Credit Union
Social Media Data	If you interact with us on social media your personal data will be visible on our platforms
Recruitment Data	CV data and application data as part of the recruitment process

3. Processing Purposes

The purposes for which personal data is processed are as follows. Depending on your interaction with us, some or all may apply.

Purpose	Details
Account Opening	<ul style="list-style-type: none"> - open and maintain an account - give consideration to an application prior to approval - Verifying the information provided in the application - comply with our legal obligations, for example anti-money laundering, to identify connected borrower, to identify a politically exposed person - confirm tax residency for the purposes of the Common Reporting Standard - meet our obligations under the Credit Union’s Standard Rules - provide members with details of the Deposit Guarantee Scheme - enable members to apply for a Current Account and Debit Card - contact members in respect of their accounts - contact members in relation to any operational matters within the credit union - record details of nominations and to process the nomination (subject to a valid nomination) and transfer any nominated property to the nominee(s) - issue members with information on any product or service held at the Credit Union or to provide details of other services, products, offers or competitions that may be of interest to our members
Loan Applications, Loan Administration and Arrears	<ul style="list-style-type: none"> - assess a loan application and determining creditworthiness for a loan - verify the information provided in the application - conduct credit searches and making submissions to the Central Credit Register - purchase loan protection from ECCU - determine whether an applicant is a connected borrower or related party borrower in order to comply with Central Bank Regulations - administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan - to take steps to secure repayment of a loan such as processing a charge on a property - providing updates on loan products and services by way of directly marketing to members - contact members regarding a loan enquiry submitted through our website or online advertising - contact members in relation to any transactions or missed payments on their account - meeting legal and compliance obligations and requirements under the Rules of the Credit Union - interact with MABS - complete a submission to the Central Credit Register where a loan falls into arrears - thank members for completing their loan payments in full - enable members to avail of AIS (Account Information Service) process to share their bank account transactions with us as part of a loan application. This process is carried out by an Independent Data Controller (Truelayer) and consent will be obtained by Truelayer; - where there is a breach of the loan agreement, we may use the service of a solicitor to recover the debt. We will pass them details of the loan application in order that they make contact and details of the indebtedness in order that they recover the outstanding sum <p>Guarantors: As part of the conditions of a loan, the appointment of a guarantor may be a requirement in order to ensure the repayment of a loan. In such instances, we have a legal and regulatory requirement to collect, process and store certain personal data of the guarantor. This will include data such as: name, address, contact details, occupation, PPSN, salary and other relevant financial data.</p> <p>The purposes for which we may process the data of the guarantor include:</p> <ul style="list-style-type: none"> - ensure the terms of the loan agreement are met - contact the guarantor if the loan falls into arrears or there is a change in the payments by the member that indicate a change in circumstances - collect the debt - carry our required credit searches

	<ul style="list-style-type: none"> - carry out CCR checks and submissions (note: this is a legal requirement since 1st February 2025)
General Account Administration and Credit Union Operations	<ul style="list-style-type: none"> - record telephone conversations to offer individuals additional security, resolve complaints and improve service standards - contact members to thank them for their custom, particularly in relation to the completion of a loan - contact members, using any contact method supplied, about reactivating dormant accounts - when we issue a debit card and for the administration of a current account held in our Credit Union - record CCTV footage to ensure the safety and security of our staff, members, volunteers and any other third parties visiting our premises, to resolve complaints and improve service standards - collect certain personal data if members attend the AGM such as name, account number and signature - issue obligatory information to members (eg. AGM notifications, annual accounts and certain reports) - collect member preferences regarding marketing materials - providing updates on our products and services by way of directly marketing to members - from time to time, we may collect a small amount of personal data for entry into competitions and prize draws e.g. Car Draw. We will only use this data for the purpose of determining entry and selecting a winner for the competition/draw. Any photographic images or videos processed during participation in competitions or draws will only be done so with specific consent - manage recruitment campaigns and associated activities
Online Account Operations	<ul style="list-style-type: none"> - login to the online platform - use our Mobile App - transfer funds - manage payments and payees - apply for a loan - upload loan supporting documentation - upload updated ID and POA documents - avail of open banking (AIS process) - apply for membership of the credit union, and - upload documentation required a membership stage.
Operation of our Website and Social Media pages	<ul style="list-style-type: none"> - carry out analytics - promote our services - interact with members and the public - manage our website and user activity

4. Lawful Basis for Processing

Below is a summary of our use of personal data and the lawful basis we rely on for the processing different categories of data for different purposes.

Lawful Basis	Examples
Performance of a Contract	<ul style="list-style-type: none"> - the processing is necessary for us to setup and manage accounts and provide all services provided to our members - for the purpose of assessing any loan application, processing applications individuals make and to maintain and administer any accounts held with the credit union - to take steps to secure repayment of a loan where a loan goes into arrears - to apply for Loan Protection - to process a credit assessment when a member applies for a loan - to apply for and obtain a debit card and to administer a current account - to perform any part of a contract as per the Terms and Conditions outlined to our members in any such process

Compliance with a Legal Obligation	<ul style="list-style-type: none"> - to comply with the regulations as outlined in the Credit Union Act 1997 (as amended) - to meet our duties to the Regulator, the Central Bank of Ireland - to fulfil reporting obligations to Revenue related to a member's tax liability under Common Reporting Standard - to comply with anti-money laundering and combating terrorist financing obligations under The Money Laundering provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2018, as amended by Part 2 of the Criminal Justice Act 2013 - to meet our legislative and regulatory duties to maintain audited financial accounts - to comply with credit reporting obligations - to comply with Connected/Related Party Borrowers obligations - to comply with the Verification of Payee Scheme managed and governed by the European Payments Council (EPC) - to appoint a person to administer an account where a member becomes mentally incapacitated
Legitimate Interests	<ul style="list-style-type: none"> - assessing a loan application, we may utilise credit data from credit referencing agencies. Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use credit scoring information in order to determine suitability for a loan. We will also review our member's credit history on our database to assess each member's past history and suitability for future lending. We will do so to ensure we lend responsibly and protect the financial stability of the credit union. - when carrying out searches relating to credit worthiness. Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use credit scoring information in order to determine loan suitability. - CCTV recording on our premises. Our legitimate interest: 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. - voice recording through phone conversation both incoming and outgoing. Our Legitimate interest: 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. - during a recruitment process when we need to communicate with candidates. Our Legitimate interest: to update candidates on the recruitment process for the purposes of considering them for employment or for future positions. - carrying out debt collection activities in the event of non-payment of a loan or missed payments. Our legitimate interest: we have a duty to our members to ensure the financial stability of the credit union so we must collect all amounts owed to us. - carrying out data analytics. Our Legitimate interest: to ensure we are offering relevant services, to assess demand for certain services and to ensure we are acting in the best interests of the credit union to guarantee financial stability into the future. Data of individual accounts will not be analysed where individuals can be identified. - enabling fraud monitoring on outgoing SEPA Instant payments. Our legitimate interest: to assist us in preventing the detecting fraud for the protecting of the credit union and our members.
Consent	<ul style="list-style-type: none"> - for processing health data on ECCU forms for loan protection - visitors to our website can choose to consent to cookies or not - we will only send marketing emails to members who have consented to receive them - competition winner can choose to consent to having their photos taken and used on social media or our website - for the School's Quiz, the school is responsible for collecting consent to the processing of student data - If you avail of the AIS process (commonly known as open banking) as part of a loan application, the AISP (Account Information Service Provider) Truelayer Ireland Limited, will look for consent to retrieve your bank account information and to share this with us. For the purposes of this process, Truelayer are an independent data controller.
Vital Interests	<ul style="list-style-type: none"> - Where we must share or process personal data for the protection an individual in critical situations

Public Interest	- Following guidelines from Public Health Authorities and Government in the event of any future pandemics
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5. Data Sharing and Transfers

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 personal data and will be protected in line with data protection law.

Ways in which we may share personal information include:

- With official bodies including, but limited to:
 - the Irish League of Credit Unions (ILCU) under the ILCU Standard Rules and the League Rules which govern the operation of Credit Unions.
 - ECCU Assurance DAC who provide Loan Protection and personal data must be shared in order to administer claims or deal with insurance underwriting.
 - The Central Credit Register who provide financial institutions with credit details relating to a member's eligibility for a loan.
 - The Central Bank of Ireland enforce certain reporting, compliance and auditing on Credit Unions. 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 the Board/Management teams family or a business in which a member of the Board /Management Team has a significant shareholding.
 - Government Departments such as Department of Finance and the Department of Social Protection may require the Credit Union to share certain personal information in order to meet legislative and regulatory requirements.
 - The Revenue Commissioners impose certain reporting obligations on Credit Unions under the Common Reporting Standards in relation to tax residency and the in respect of dividend or interest payments to members.
 - Certain domestic and foreign tax authorities to establish your liability to tax in any jurisdiction.
- To engage external IT providers to ensure the security of our IT systems in order to protect all personal data.
- With our insurers or assessors when providing or reviewing information in the event of an incident occurring.
- To engage professional services of third parties, such as auditors, solicitors or any other such business advisers. Any such parties are bound by confidentiality.
- to offer debit card services to our members, we have partnered with PAYAC who act as Appointed Coordinators and Programme Managers.
- We reserve the right to report to law enforcement any activities that we, in good faith, believe to be illegal
- If we issue you with 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 here <http://currentaccount.ie/files/tpl-privacy-policy.pdf>.
- If you avail of the AIS process as part of a loan application, you will be sent a link to the provider's portal (Truelayer Ireland Limited) where you will be asked to consent to retrieve your bank account information and to share this with the Credit Union. For the purposes of this process, Truelayer are an independent data controller, and you can find full details about this process our website.
- We may share relevant personal data with the Decision Support Service where required by law or where necessary to fulfil our legal obligations in relation to supported decision-making arrangements.
- We may share relevant personal data with our fraud monitoring service provider, NEXI, to enable the monitoring of transactions for suspicious activity and the prevention of fraudulent or unauthorised payments.
- We use a third-party platform to monitor transactions in line with our legal obligations under Anti-Money Laundering legislation.
- As required by the European Payments Council's Verification of Payee Scheme, we share IBAN and Account Names with Banfico, acting as the Routing & Verification Mechanism, to verify payee information and return a match result.
- With any relevant, authorised third parties as part of a merger or acquisition, any such parties will be bound by a duty of confidentiality.

- To provide information to An Garda Síochána (eg. CCTV footage) or other Government bodies or agencies when required to do so by law.
- To transfer data to another credit union where we have received a request, authorised by you, from another credit union to do so.
- To operate video embedding with Vimeo on our website. Visitors must consent to certain cookies in order to view these videos.

[Third Country Transfers](#)

There may be circumstances where we transfer your personal data outside the EEA, such as when we use the services of online platforms or where we use a cloud-based IT system to hold your data. We safeguard your data by ensuring a minimum of one of the following safeguards is in place:

- a contract based on “model contractual clauses” (also called Standard Contractual Clauses) approved by the European Commission, obliging them to protect your personal data;
- Binding Corporate Rules approved by relevant data protection authorities, ensuring your data is protected within a group of companies; or
- with companies located in a third country approved by the European Commission under an adequacy decision, such as the UK.

Where any of our suppliers engage the service of sub-processor to process data of which we are a Data Controller, our due diligence measures will include an assessment of this processor, in particular where the processor is located outside the EEA. Existing third parties located in the US that are involved in the processing of personal data are:

- DocuSign – for digital signatures through the online banking facility
- Vimeo – for video embedding on our website

Appropriate security measures and contractual agreements are in place to protect your data whenever it is shared with any third parties.

6. Security Measures

We ensure the confidentiality, integrity, availability, and resilience of personal data when in use, transit and storage. We are obliged to protect the data from inadvertent destruction, amendment, loss, disclosure, corruption or unlawful processing.

- Appropriate security controls, including technical and non-technical are utilised to protect Credit Union data.
- Computer screens, printouts, files or documents displaying personal data are only visible to authorised personnel.
- Personal data held in manual (paper) files is held securely in locked cabinets, locked rooms or rooms with restricted access.
- Data printouts are shredded and disposed of securely when no longer required.
- Staff are instructed to always keep information strictly confidential and not to disclose or discuss an employee’s or customer’s information or circumstances with any unauthorised outside parties.
- We regularly test our systems to ensure that there are no security flaws, and have back ups in place as well as disaster recovery process and resilience testing and documentation.
- Our IT partners ensure that our systems are protected and that backups are done in real time and stored securely.
- Staff and volunteers are given regular training on how best to protect the personal data they handle during the course of their work.
- Any third parties who process personal data on our behalf are contractually bound to process personal data in line with current data protection law practices and principles thus ensuring the security of the data.

7. Data Retention

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. As a general rule, your personal information will be retained for 7 years from the date your credit union account closed. Where you apply for a loan, the documentation required for this will be retained for a minimum of 5 years from the date the loan is completed. However, there may be circumstances where we

must retain data for longer than these specified periods, but we will always have a defined legitimate basis for any extended retention.

We maintain a full Retention Schedule in our Records Management Policy, for further details please contact us.

8. Your Rights

Right	Details
Right to be informed	You have the right to be informed about how your personal data is collected, used, and shared by the credit union. This information is provided in our privacy notice and at the point where we collect your data.
Right of access	You have the right to request a copy of the personal data we hold about you, along with information on how we use it. This is commonly known as a data subject access request.
Right to rectification	You have the right to have inaccurate or incomplete personal data corrected without undue delay. We encourage you to keep your details up to date with the credit union.
Right to erasure	You have the right to request that we delete your personal data where there is no lawful basis for us to retain it. This right is not absolute and may not apply where we are required to retain data for legal or regulatory purposes.
Right to restrict processing	You have the right to request that we limit the processing of your personal data in certain circumstances, such as where you contest its accuracy or object to its use.
Right to data portability	You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have it transferred to another provider where technically feasible and where processing is based on contract or consent.
Right to object	You have the right to object to the processing of your personal data in certain circumstances, including where we rely on legitimate interests. You also have the right to object to direct marketing at any time.
Rights relating to automated decision making	You have the right not to be subject to decisions based solely on automated processing, including profiling, where such decisions have legal or similarly significant effects on you, except where permitted by law.
Right to make a complaint	If you are unhappy with how we process your personal data, you have the right to make a complaint to the Data Protection Commission. We encourage you to contact us first so we can address your concerns. DPC's website for all details is: www.dataprotection.ie

9. Updates to this Notice

We advise you to always check our website for the most up-to-date version of our Privacy Notice. Or contact us and we can email/post you a copy.

10. Contact details

Please contact us or our Data Protection Officer (DPO) if you have any questions about this Notice or our processing of your data.

Cairde Credit Union

Post: 3 – 6 Parnell Street, Dungarvan

Phone: 058 44088

Email: info@cairdecu.ie

DPO email: dpo@cairdecu.ie

Data Protection Commission

6 Pembroke Row, Dublin 2.

01 765 01 00 / 1800 437 737

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

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