

# Tower Credit Union Ltd - Guarantor Privacy Notice

Credit Union Contact Details	
Address	22 Main Street Clondalkin Dublin 22 D22 F670
Phone	01 457 0884
Email	<a href="mailto:info@towercu.ie">info@towercu.ie</a>
Data Protection Officer Contact Details	
Email	<a href="mailto:dpo@towercu.ie">dpo@towercu.ie</a>

**Tower Credit Union** is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us.

## Purpose of Data Collection, Processing or Use

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted solely for the purpose of carrying out the abovementioned objectives.

## What personal data do we use?

We may collect, store, and use the following categories of personal information about you:

- Your name, contact details, address, date of birth, proof of identification and address documents, signature, employment details, income, occupation, employer, credit union transactional data, financial data, status and credit history, financial information such as outgoings, bank statements, details from credit reference agencies on other loans/debts held by you, interactions with credit union staff and officers on the premises, by phone, or email, CCTV footage, telephone voice recordings.

## Why we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union
- To contact you in respect of your guarantee in the event of the change of circumstance of the member/ member getting into arrears
- Collection of the debt
- Conduct due diligence/credit checking
- To meet reporting obligations to the Central Credit Register

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

## Data Retention Periods

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. We document the reasons for our retention periods and where possible the retention periods themselves in our Retention Policy. Your details will be held for seven years following default of the borrower, date of demand, discharge, transfer or repayment of the loan.

Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

### **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.towercu.ie](http://www.towercu.ie) or you can ask us for a copy.

### **How we may share the information**

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU) and our advisers such as solicitors, debt collectors or auditors. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal data with our regulator the Central Bank of Ireland as required to comply with the law. The Privacy Notice of the ILCU is available at [www.creditunion.ie](http://www.creditunion.ie).

### **Our use of your information**

Our legal basis for processing personal data supplied by you for the purpose of this guarantee is in furtherance of this contract and legitimate interest if a credit search /due diligence is conducted.

### **Please note that the below 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 in writing using their contact details above.

**There is no fee in using any of your below 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 doubt 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 straight away if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us using our contact details at the top of this document.

### **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 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.








### **Account Information Service**

AIS is provided by an independent third party, Truelayer (Ireland) Limited. Truelayer (Ireland) Limited is registered as an Account Information Services Provider (AISP) with the Central Bank of Ireland and their privacy policy is available [here](#).

## Use of Credit Union Current Account Transaction Data when Assessing Loan Applications

If you hold a current account with the credit union, when you make a loan application to the Credit Union the Credit Union may review the transaction data on your Credit Union current account as part of the loan assessment process.

### Your Rights in connection with your Personal Data

	<b>To find out</b> whether we hold any of your personal data <b>and if we do to request access</b> to that data and to be furnished with a copy of that data. You are also entitled to request further information about the processing.
	<b>Request correction</b> of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
	<b>Request erasure</b> 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).
	<b>Object to processing</b> 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.
	<b>Request the restriction of processing</b> of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances.
	Where we are processing your data based solely on your consent <b>you have a right to withdraw that consent at any time and free of charge.</b>
	Request that we: a) <b>provide you with a copy of any relevant personal data in a reusable format</b> ; or b) <b>request that we transfer your relevant personal data to another controller</b> where it's technically feasible to do so. <i>Relevant personal data</i> is personal 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.

You have a right to complain to the Data Protection Commissioner (DPC) in respect of any processing of your data by:

**Telephone:** +353 (0)57 868 4800, +353 (0)761 104 800  
**Lo Call Number:** 1890 252 231  
**Web Form:** <https://forms.dataprotection.ie/contact>

**Postal Address:** Data Protection Commissioner  
21 Fitzwilliam Square South, Dublin 2, D02 RD28