

Tower Credit Union - General Privacy Notice

1. About Tower Credit Union

Address:

Main Office: 22 Main Street, Clondalkin, Dublin 22, D22 F670
Neilstown Office: Neilstown Road, Clondalkin, Dublin 22, D22 X954
Citywest Office: Citywest Shopping Centre, Citywest, Dublin 24, D24 V8NN
Greenhills Office: 90A St Peters Road, Greenhills, Dublin 12, D12 WR63
Celbridge Office: Main Street Celbridge, Co Kildare, W23 YT25

Website: www.towercu.ie

Email: info@towercu.ie

Phone: 01 4570884

DPO Contact: dpo@towercu.ie

Tower Credit Union Ltd 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.

This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes. This notice combines the text of the Membership Privacy Notice and the Lending Privacy Notice.

2. 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.

3. What personal data do we use?

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

Identification Data

This includes your name, country of residence, date of birth, Tax Identification/PPSN numbers, marital status, gender, nationality, country of birth, identification documents, passport details, drivers license, nominations, beneficial ownership, PEP status, source of wealth, source of funds, tax residency, signatures, photograph.

Contact Data

This includes email, telephone, address.

Member Financial Data

This includes financial data such as status and history, transaction data, contract data, details of the credit union products you hold with us, accommodation status, employment status, employment details, length of service, salary, occupation, bank details, mortgage details, spouse /partner information, loan purpose, CCR Information, credit card information, guarantor information,

number of dependents, previous addresses, connected borrowers, pay slips, other income, loans with other institutions, bank statements, laser card details.

CCTV Data

We operate CCTV cameras at the Credit Union. If you pass by and/or visit any of the Credit Union premises, your image may be recorded on CCTV.

Correspondence Data

This includes interactions with credit union staff and officers on the premises or by phone or by email, telephone voice recordings, current or past complaints.

Web Data

This includes IP address, cookies.

Marketing Data

This includes your preferences in receiving marketing from us and your correspondence preferences.

Health Data [Special Category Data]

When you are taking out a loan the Credit Union may ask you to make a health declaration in order to obtain insurance cover for the loan. While loan Insurance is free to members, it is a requirement of our loan terms that our members take out insurance on unsecured loans.

We process this information with your explicit consent.

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.

4. Why we process your personal data

- To open and maintain an account for you;
- To meet our obligations to you under the Credit Union's Standard Rules
- To contact you in respect of your account and any product or service you avail of
- To comply with our legal obligations for example anti-money laundering and beneficial ownership reporting obligations.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- In order to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to the Central Credit Register.
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.
- We may use credit scoring techniques [and other automated decision-making systems] to either partially or fully assess your application.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and services by way of directly marketing to you.
- When acting as an insurance intermediary, to meet our obligations.

We may also collect, store and use "special categories" of more sensitive personal information including Information about your health, including any medical condition, health and sickness (See Insurance for further details).

5. How we use particularly sensitive personal data

“Special categories” of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. 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.

6. How secure is my information with third-party service providers?

All our third-party service providers are 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.

7. If you fail to provide personal information

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.

8. Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

9. Profiling

We 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.

10. 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.

11. 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](#).

12. 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.

13. 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. 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. This information is documented in our Retention Policy.

Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

Purpose	Retention Period
Accounting records	required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than six years from the date to which it relates.
AML	The money laundering provisions of Anti-Money Laundering legislation require that certain documents must be retained for a period of five years after the relationship with the member has ended.
Income Tax	We keep income tax records for a period of six years after completion of the transactions to which they relate.
Loan Application	Loan application information is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.
CCTV	CCTV footage which is used in the normal course of business (i.e. for security purposes) for one month.
Credit Agreements	Credit agreements are contracts and as such the credit union retains them for seven years from date of expiration or breach, and twelve years where the document is under seal.

14. Planned data transmission to third countries


We retain all of your data either within the Republic of Ireland or within other member states of the European Union or the EEA countries (Norway, Iceland and Liechtenstein). Data may be transferred from us to the UK which is a third country. The data is transferred on the basis of an adequacy regulation by the EU in respect of the UK.

15. 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 or you can ask us for a copy.

16. Our use and sharing of your information.

We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use this information for the following purposes:

	Fulfilling 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 maintaining and administer any accounts you have with the credit union.
	Security: In order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or other personal assets.
	Third parties: 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.
	Irish League of Credit Unions (ILCU) Affiliation: 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, 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 (which the credit union is bound to the ILCU by). 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. The Privacy Notice of ILCU can be found at www.creditunion.ie
	The ILCU Savings Protection Scheme (SPS): 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.

Insurance: 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. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable).

If you choose to take out a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

Electronic Payments: For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), we are required to share your personal data with our payment service provider.

Intesa Sanpaolo S.p.A. If you 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 **AIB**.

Member Service: To help us improve our service to you, we may use information about your account to help us improve our services to you.

Guarantors: As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that credit union ensures the repayment of your loan. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we will give them details of the outstanding indebtedness. If your circumstances change it may be necessary to contact the guarantor

Debit Card: 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 <https://currentaccount.ie/files/tpl-privacy-policy.pdf>

Credit Assessment: When assessing your application for a loan, the credit union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing credit union file,
- credit referencing agencies such as the Irish Credit Bureau and the Central Credit Registrar

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit unions lending policy.

Use of E-Signature: we provide this facility through DocuSign. Personal data will be held by DocuSign through a copy of the signed agreement. The data will be held for a period of 14 days from the date of signing and will then be deleted.



Legal Duty

This basis is appropriate when we are processing personal data to comply with an Irish or EU Law.

Tax liability: We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any 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 Bureau of Ireland if required by law.

Purpose of the loan: We are obliged to ensure that the purpose for the loan falls into one of our categories of lending.

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under The Money Laundering provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013. the Criminal Justice (Money Laundering and Terrorist Financing) Act 2018 and the Criminal Justice (Money Laundering and Terrorist Financing) (Amendment) Act 2021 (the latter two were introduced under the 4th and 5th AML/CTF EU Directives). This will include filing reports on the Beneficial Ownership Register, the Beneficial Ownership Register for Certain Financial Vehicles (“CFV”), on the Bank Account Register, the European Union Cross-Border Payments Reporting (“CESOP”), the Central Register of Beneficial Ownership of Trusts (“CRBOT”) and the Ireland Safe Deposit Box and Bank Account Register (ISBAR). This reporting obligations requires 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 the credit union directly.

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.

Credit Reporting: Where a loan is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted in the sum of €500 or more, the credit union is obliged to report both personal details and credit details of the borrower and guarantor to the CCR.

House Loan: Where you obtain a house 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.

Connected/Related Party Borrowers: 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.



Legitimate interests

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

CCTV: We have CCTV footage installed on the premises with clearly marked signage. The purpose of this is for security.

Our legitimate interest: With regard to the nature of our business, it is necessary to secure the premises, property herein and any staff /volunteers/members or visitors to the credit union.

Voice Recording: We may record phone conversations.

Our Legitimate interest: To ensure a good quality of 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.

Credit Assessment and Credit Reference Agencies:

When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from the Central Credit Registrar (see *Legal Duty*).

Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency, we will pass them your personal details and details of your credit performance.

Debt Collection: Where you breach the loan agreement we may use the service of a debt collection agency, solicitors or other third parties to recover the debt. We will pass them details of the loan application in order that they make contact with you and details of the indebtedness in order that they recover the outstanding sums.

We use a private investigator in order to locate you in the event that you fail to make repayments on your loan and or fail to make contact with the credit union.

Our legitimate interest: The credit union, where appropriate will necessarily take steps to recover a debt to protect the assets and equity of the credit union.

Judgements Searches: We carry out searches in **Stubbs Gazette** in order to assess your credit worthiness to repay a loan.

Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring information in order to determine your suitability for the loan applied for. In carrying out such a search we can better determine your overall financial position in order to lend to you.



Your consent

We will only carry out processing which is based on your consent and will cease processing once you withdraw such consent

Marketing and Market Research

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may include using the Irish League of Credit Unions and/or specialist market research companies.

Art Competition

This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information and asked for your consent to the processing of personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16 then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Schools Quiz

This credit union is involved in the Schools Quiz in liaison with the ILCU. The Schools Quiz is open to entrants aged 4 to 13. Upon entry parent/legal guardians will be given further information and asked for their consent to the processing of their child's personal data. This information is processed only where consent has been given. Where the person providing consent is below 16 then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all School Quiz entry forms.


Your Marketing Preferences

As part of improving our service to you, from time to time, we would like to inform you of goods, services, competitions and/or promotional offers available from us. We may wish to use different means when sending such marketing communications.

You have a right to notify us free of charge at any time that you wish to refuse such marketing by writing to us at our address at the top of this document or by using the "opt-out" options in any marketing message we send you.

Please contact us directly should you wish to change or withdraw your consent.

17. Your Rights under GDPR.

Your Rights in connection with your Personal Data	
	To find out whether we hold any of your personal data and if we do to request access to that data and to be furnished with a copy of that data. You are also entitled to request further information about the processing.
	Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
	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.
	Where we are processing your data based solely on your consent you have a right to withdraw that consent at any time and free of charge.
	Request that we: a) provide you with a copy of any relevant personal data in a reusable format ; or b) request that we transfer your relevant personal data to another controller 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.

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 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 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.

18. Supervisory Authority

The Data Protection Commission in Ireland may be contacted using the contact details below if you have any concerns or questions about the processing of your Personal Data.

Contact Details

Online Form:	https://forms.dataprotection.ie/contact
Telephone:	+353 (0)57 868 4800, +353 (0)761 104 800
Lo Call Number:	1890 252 231
Postal Address:	21 Fitzwilliam Square South, Dublin 2, D02 RD28