



Mortgages Privacy Notice

The data controller is Clonmel Credit Union Ltd

Credit Union House, Parnell Street, Clonmel, Co Tipperary, E91 C622.

Tel: 052 6125292

Email: admin@clonmelcu.com

Our Data Protection Officer can be contacted by e-mailing dpo@clonmelcu.com, or by post at the address above.

The **purpose of the processing** is an application for mortgage credit from the member and an assessment of this application by the credit union. A successful application will result in a letter of offer being issued, and a mortgage credit agreement if this is accepted.

The **legal basis for processing** is for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract

Categories of data we collect for this processing:

- Full name/maiden name/signature
- Current and previous addresses
- Email address; phone number(s) and other contact information
- Age/date of birth
- Gender
- Marital status
- Partner/spouse; number of dependents
- Occupation and place of work
- Your bank account or other credit union account details
- Tax Identification Number/PPS Number
- Financial information, such as Income and expenditure, payroll, credit or payment card details, and, if appropriate, accounting records
- Proof of identity and address e.g. copy of driving licence/passport and utility bills
- Accommodation status; mortgage or tenancy information
- IP address
- Imagery data, including CCTV footage, and voice (call) recordings

We collect and hold health related data about you, which is **special category data**, gathered for the purpose of insurance on your loan.

If you apply for a mortgage we partner with Creditlogic to provide a secure, streamlined mortgage application process. All processing is carried out within the EU.

Who we share your data with - sharing of your data can occur with the following:

- persons you have authorised to act on your account
- guarantors
- credit reference / rating agencies
- our loan protection insurance provider
- statutory and regulatory bodies, and law enforcement authorities
- systems suppliers providing systems support, off-site data backups, testing backup data, etc.
- supplier used for checking the names of members against sanctions lists,
- debt collectors & solicitors used for recovery of outstanding debts

There are no **transfers of your personal data outside of the EEA**

Retention of your data - In a successful application for a mortgage, in compliance with legal requirements for record keeping, mortgage applications, mortgage assessment forms, letters of offer. and mortgage credit agreements are held for 7 years after they have been topped-up or completed. Supporting materials for assessment of ability to repay and guarantor materials are destroyed once the loan is topped-up or completed. ECCU forms are destroyed on completion of a loan.

In the case of an unsuccessful, cancelled or withdrawn application, all personal data related to the application will be deleted after a period of 3 months.

Your rights as a data subject - you have the right to:

- Data access - find out how we use your information, what information of yours we have, and receive copies of this information
- Rectification or erasure of data - have inaccurate/incomplete information corrected and updated, and, in certain circumstances, to have your information deleted
- Restriction of processing - in certain circumstances, to have our use of your data restricted
- Objection to processing - in certain circumstances, to object to particular use of your personal data for our legitimate business interests (e.g. for direct marketing purposes). You also have the right not to be subject to solely automated decisions, and the right to have a person review such decisions.
- Data portability - exercise the right to data portability (i.e. obtain a transferable copy of your information we hold to transfer to another provider)

Processing based on consent - while this processing is not based on consent, we would like to remind you that, if our lawful basis for processing your data is your consent to do so, you have the right to withdraw consent at any time. You may do this by dropping into one of our offices, or by writing to, or emailing us.

Provision of personal data for a mortgage application - provision of your personal data for your mortgage application is a requirement necessary to enter into this contract. Failure to provide the required information means we cannot process your mortgage application.

Automated decision making - we use a credit scoring system which helps us assess your ability to repay by comparing your overall income with all your financial commitments. Our decision to lend to you may be based partly on this system, and such processing will never be the sole basis for our decision.

You have the right to obtain human intervention in this automated process, to express your point of view, to obtain an explanation of the decision reached after such assessment, and to challenge the decision.

We may use automated processing to assist in compliance with our legal obligations around the prevention of money laundering, fraud and terrorist financing, for example, to screen for suspicious transactions.

Profiling - we use anonymised information to create member profiles, grouping individuals with similar characteristics together, to produce statistical information on our membership and on our service provision. This is done to assess service uptake, and for marketing purposes to identify services other members might find useful. You have the right to object to this processing.

Notification of additional processing - please note that, if, at some future time, we wish to use the data you are today providing for a purpose other than that outlined here, we are obliged to let you know beforehand.

Updates - This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be retained in the shared folder on the system or can be obtained from the DPO or the Manager.

Lodging a complaint - you have the right to lodge a complaint about your personal data being processed, either with our Data Protection Officer (as above), or directly with the Data Protection Commission (contact details below):

Telephone +353 (0)1 765 0100 / 1800 437 737

E-mail info@dataprotection.ie

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

Address: Data Protection
Commission

21 Fitzwilliam Square South

Dublin 2 D02 RD28

You can find more detailed information on what personal data we process and how we process it in our main Privacy Notice on our website www.clonmelcu.com