



Lending Privacy Notice of Progressive Credit Union Limited.

Form Number: PCU. F129

Rev: 1.4

Effective Date: 04/01/2022

Introduction

Progressive 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 above-mentioned objectives.

This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes. If you apply for a loan with us, you will be provided with our Lending Privacy Notice to take account of further processing that may be necessary.

Data Controller Contact details:

Registered Address: Progressive Credit Union, 43-45 Dublin Street, Balbriggan, Co. Dublin K32NX58

Phone: 01-8411348

Email: info@progressivecu.ie

Data Protection Officer:

Progressive Credit Union has appointed a Data Protection Officer to enhance and maintain the protection and privacy of all personal data the credit union processes. If you have any queries regarding the use of your personal data you can contact the DPO at any time.

Data Protection Officer contact details:

Data Protection Officer,
Progressive Credit Union,
43-45 Dublin Street,
Balbriggan,
Co. Dublin.

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

What personal data do we use?

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

- Your name, address, date of birth, title, member number, gender, dependents, email, telephone, financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, source of wealth, source of funds, outgoings and financial commitments, credit history, Politically Exposed Status, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, relationship with joint borrower or other members, business ownership, directorships held, retirement age, first time buyer, pension details, residency, nationality, criminal sanctions, Tax Identification/PPSN numbers, passport details, driver licence details, tax residency, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings.
- **Additional Information required for home loans as follows:** Valuation Reports, Land Registry folio, Certificate of Title, Life Assurance cover documents – these documents contain the following information – Name, Address, date of birth, property value, members solicitors name, address and contact details and medical data.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your health, including any medical condition and sickness (see insurance for further details)

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 to perform our contract of providing financial services to you.

Purpose for which we process your personal data;

The credit union will use your personal data to assist it in carrying out the following:

- Assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.
- We are obliged 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, 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.
- Meeting legal and compliance obligations and requirements under the Rules of the Credit Union.
- 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.

We need all the categories of information in the listed to allow us to; identify you and contact you and in order that we perform our contract with you.

We also need your personal identification data to enable us to comply with legal obligations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

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 data. 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.
4. Where we are required to process it for the purpose of insurance on the loan
5. Where it relates to the proper management of your account, mental or physical health data may be processed.

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.

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.

Data Security, Integrity and Confidentiality

Progressive Credit Union has implemented all necessary physical and technical measures to ensure all data is secure and remains confidential. Progressive Credit Union’s Officers undertake yearly training to ensure compliance with all policy and procedures relating to Data Protection. Progressive Credit Union monitors and reviews these measures annually.

If you fail to provide personal data

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.

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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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, anti-money laundering purposes and compliance with our legal duties in those regards. We also carry out profiling in order to tailor our marketing to you by post, where we retain consent to do so.

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:

- Credit agreements are contracts and as such the credit union retains them for six years from date of final repayment and/or twelve years where the document is under seal.
- Loan applications form part of your credit agreement and as such we retain them for six years from the date of final repayment.
- Loan assessment documentation (i.e. Pay slips, P60's, Bank statements etc.) – this documentation will be retained in conjunction with the loan application and credit agreement for six years from the date of final repayment to ensure ability to repay was assessed appropriately.
- CCR reports – this documentation will be retained in conjunction with the loan application and credit agreement for six years from the date of final repayment to ensure ability to repay was assessed appropriately.

Planned data transmission to third countries (i.e. places outside of the European Economic Area)

Progressive Credit Union's sub-processor used to verify your Identity documents has storage servers in the US and India, enhanced security measures are in place to ensure your data is secure.

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 www.progressivecu.ie or you can ask us for a copy.

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, see details below:

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 maintain 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 be done with respect for the security of your data and will be protected in line with data protection law.

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.

Change in personal circumstances: You agree to notify us without delay in the event of any change in your personal circumstances, to enable us to comply with our obligation to keep information up to date.

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, guidance, 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

Covid-19 Credit Guarantee Scheme: The Covid-19 Credit Guarantee Scheme is provided by the Government through the Department of Enterprise, Trade and Employment to incentivise finance providers such as credit unions to support economic activity through lending to their Small, Micro and Medium-Sized (SME) corporate members. As part of this arrangement, the State provides a guarantee to credit unions of up to 80% of the loan, and in order to facilitate the operation of this Scheme, the credit union is required to periodically report to the Department via a Loan Portal which is managed by the Strategic Banking Corporation of Ireland (SBCI) on behalf of the Department. The periodic reports include data protection consents, name and contact details of the borrowing representative/business owner, eligibility criteria, purpose of the loan, loan amount, debt history, details about the business, borrower county, date of drawdown, relevant security/collateral and its value, loan performance and repayment details, and gender and data of birth where the borrower is an agricultural business owner. The credit union is processing this data in order to comply with the requirements of the Scheme and as part of its legal and contractual obligations with you the member, and with the Department and SBCI.

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.

Loan Repayment Protection provided by CUNA Mutual

Any information provided by you or regarding you will be processed by the insurer in compliance with the provisions of the General Data Protection Regulation for the purpose of providing insurance and handling claims. This may require you to provide such information to third parties.

All phone calls relating to applications and claims may be monitored and recorded and the recordings used for fraud prevention and detection, training and quality control purposes.

For further information on how the insurer uses your data, please refer to the Policyholder Privacy Notice https://www.maidenlg.com/policy_holder?id=privacy_notice.

Subject to the provisions of the General Data Protection Regulation, you are also entitled to receive a copy of the information the insurer holds about you.

Such requests should be made in writing to:

The Data Protection Officer, Maiden Life Försäkrings AB, c/o Maiden Global Holdings Ltd. Albion House, The Valley Centre, Gordon Road, High

Wycombe, Bucks, HP13 6EQ. or by email to dataprotection@maideniis.com

Any information you provide will be used by the insurer and may also be shared with third parties whom the insurer appoints to administer the insurance.

Electronic Payments: If you use our electronic payment services to transfer money into or out of your credit union account or make payments through with your debit card into your credit union account, we are required to share your personal data with our electronic payment service provider **Intesa Sao Paolo, Realex and Elavon.**



Fulfilling contract This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you, see details below:

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.

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 Central Credit Register

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

Member Service: We may use information about your account to help us improve our services to you.



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

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. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data 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, the appropriate Supervisory Authority if required under 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 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 Act").

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.

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 where applicable the guarantor) to the CCR.



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

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.

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 credit referencing agencies such as the Central Credit Registrar (See legal duty noted previously).

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.



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.

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.

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

Debt Collection: We use a private investigator in order to carry out a trace report 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 necessary take steps to recover a debt to protect the assets and equity of the credit union

Judgements Searches: We carry out searches on the Land Registry for any judgements against your property, 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.

Credit Reference Agency: Where you breach your loan agreement, we may run a credit history report on the Central Credit Register (CCR) to assess your indebtedness.

Our Legitimate interest: To enable the credit union to fairly assess your overall indebtedness in order to facilitate a possible restructure or consolidation of your existing debts.

Voice Recording: We record phone conversations both incoming and outgoing for the purpose of verifying information and quality of service.

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.

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

Our Legitimate interest: To ensure the credit union is able to maintain a good quality of service and products that are required by our members, which will benefit both the Credit Union and its members.

research companies. This marketing will be conducted at least once in a 12-month Period. All communications will have an option for you to stop receiving any such communications.

To enable the Credit Union to keep our members informed of all services and products both new and existing.



Your consent – The processing of your personal data with your consent, as follows:

Cookies Usage

Progressive Credit Union's website use both First and third-party cookies.

First party cookies are owned and created by the website you're viewing- in this case by the Credit Union.

Third party cookies are owned and created by an independent company, usually a company providing a service – such as Google Analytics.

We use cookies for the correct operation of our website as well as to understand how this website is used so that we can continue to improve it.

For more information view the cookies consent pop up on our website www.progressivecu.ie



Your Rights in connection with your personal data are to:



To find out whether we hold any of your personal data and, **if we do, to request access** to that data that to be furnished 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 data. 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 data. 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. 'Relevant personal data 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 57 8684800 +353 (0)761 104 800 Lo Call Number: 1890 252 231 E-mail: info@dataprotection.ie	Postal Address: Data Protection Commissioner Canal House Station Road Portarlinton Co. Laois R32 AP23
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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 data, object to the processing of your personal data, or request that we send you a copy/a third party a copy your relevant personal data in a reusable format please contact the Data Protection Officer in writing using their contact details listed at the beginning of this document.

There is no fee in using any of your 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 doubts 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.

To enable the credit union to ensure our information is up to date and accurate at all times, we would encourage you to notify us immediately if there is any change to any of your personal information which we hold on your file.

If you wish to avail of any of these rights, please contact us at:

Progressive Credit Union
43-45 Dublin Street
Balbriggan
Co. Dublin.
K32NX58

Date	Rev	Details
28/01/2021	1.1	Amended by DPO to include CCGS information
01/10/2021	1.2	Removed any reference to the ICB
01/10/2021	1.3	Amended by DPO to include credit checks for debt collection
30/12/2021	1.4	Amended by DPO to include LRP