

## DATA PROTECTION STATEMENT – ONLINE LOAN APPLICATIONS

### 1. Overview

*We want to explain clearly how we process your Personal Data when you apply for and receive a loan from Life Credit Union using our online loan application facility.*

In order to provide a Life Credit Union loans, we need to collect Personal Data from our members. This section of the Data Protection Statement provides specific information relating to the processing of online loan applications and subsequent maintenance of loan accounts.

### 2. Members and Their Representatives

*Our Members are individuals to whom we provide Life Credit Union loans.*

For the most part we transact directly with members in relation to the operation of Life Credit Union loans. On occasion we may transact with relatives, guarantors or representatives who are acting on behalf of a member.

When we transact with someone on behalf of a member, we will also collect limited additional Personal Data about that person, this might include:

- a person who acts as guarantor on a member’s loan;
- a spouse or relative who provides information to us to support the loan application;
- a legal representative of a member who communicates with us on the member’s behalf.

### 3. Categories of Personal Data

*This Data Protection Statement provides information relating to the categories of Personal Data we process.*

When you apply for a Credit Union loan using our online loan facility, we collect the following information.	
Category of Personal Data:	Description:
Contact Data	This includes email address, phone number, postal address, billing address.
Financial Data	This includes financial data such as your account status and history. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, mortgage details, other loans and debts, previous

	addresses, spouse, partners and we may request further information to support the purpose for the loan.
<b>Correspondence Data</b>	If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence.
<b>Web Data</b>	When you apply online we collect details such as username and password in (order to create an account), information about your interactions with the online loan facility such as your IP Address, time and date of interactions and the progress of your application.
<b>PPSN</b>	Your Personal Public Services Number (PPSN) will be collected in order to meet our reporting requirements to the CCR.
<b>Health Data</b>	You complete a health declaration form for the purpose of loan insurance. The level of information required will depend on factors such as your age, your health situation and the amount of the loan.

#### 4. Processing Activities

*We have set out below the general purpose of processing the categories of Personal Data processed and the related lawful basis for processing.*

<b>We must process Personal Data legally. As a regulated entity much of the data that we process is required to meet with a regulatory obligation or in order to deliver Credit Union loan services to you.</b>		
<b>Purpose of Processing:</b>	<b>Categories of Personal Data:</b>	<b>Lawful Basis:</b>
To process your application for a loan;	Contact Data Financial Data	Contract Should this include Legal Obligations also
To assess your application for a loan;	Contact Data Financial Data PPSN	Legal Obligation Legitimate Interests
To provide loan drawdown and to manage the repayment schedule; To provide you with information about the performance of your loan;	Contact Data Financial Data Correspondence Data	Contract
To administer the ILCU Loan Protection Scheme;	Contact Data Financial Data Health Data	Contract Explicit Consent
To implement credit control measures where there are missed loan repayments;	Contact Data Financial Data	Contract Should this include Legal Obligations

To carry out credit control including collecting and enforcing debts and arrears;		
To comply with our legal reporting obligations in respect of the Central Credit Register (CCR);	Contact Data Financial Data PPSN	Legal Obligation
To interact with the regulator and the Central Bank of Ireland for reporting, compliance and auditing purposes;	Contact Data Financial Data	Legal Obligation

## 5. Sources of Personal Data

We receive information from you when you apply for a loan online.

This information is collected from you directly through the online loan application facility or from you and other people in the case of a joint loan application or where proof of household income is sought.

We receive information from external sources such as the ICB and CCR when we carry out Credit Checks relating to the Loan application.

We receive information from you during the course of the loan such as:

- information related to loan repayments;
- information you supply when you communicate with us about your loan repayments.

We may receive information about you from a representative when they communicate with us on your behalf.

## 6. Retention of Loan Information

Our retention policy is as follows:	
Purpose:	Retention Period:
Loan application and approval, loan administration	Termination of loan + 7 years

Note that this section of the Credit Union Data Protection Statement relates only to how we process data relating to the processing of Life Credit Union loans.

As part of the online loan application process you may also be joining the Life Credit Union as a member. You will be provided with information about how we process Member Information during the member application process.

We provide information about how we process your data when you interact with any of Life Credit Union Services such as membership; website; online banking; and other general services offered by the Credit Union on a service by service basis. You can also read the full [Life Credit Union Data Protection Statement here](#).

# DATA PROTECTION STATEMENT - MEMBER ACCOUNTS

## 1. Overview

*We want to explain clearly how we process your Personal Data when you open and operate an account as a Life Credit Union Member.*

In order to provide Life Credit Union services, we need to collect Personal Data relating to our members. This statement provides more detailed information about the processing activities of Life Credit Union relating to member accounts. This statement forms part of the general data Protection Statement of the Credit Union.

Capitalised terms that are defined in the general Data Protection Statement shall have the same meaning when used in this Data Protection Statement for Member Accounts.

## 2. Members and Their Representatives

*Our Members are individuals to whom we provide Life Credit Union services, for example operating savings and budget accounts or offering loans or online banking services.*

For the most part we transact directly with members in relation to the operation of Life Credit Union account. On occasion we may transact with relatives, beneficiaries, guarantors, relations or representatives who are acting on behalf of a member.

When we transact with a representative individual on behalf of a member, we will also collect limited additional Personal Data about that person. These situations may arise as follows:

- a person who is nominated as beneficiary on the account in the event of the members death;
- a person with power of attorney on a member's account;
- a parent/guardian who is supervising a juvenile account;
- a person who acts as guarantor on a member's loan;
- a legal representative of a member who communicates with us on the member's behalf.

## 3. Categories of Personal Data

*This Data Protection Statement provides information relating to the categories of Personal Data we process.*

When you become a member and when we are operating your account, we collect the following information.	
Category of Personal Data:	Description:
Identification Data	This includes name, marital status, title, date of birth, gender, PPSN, photographs, job title and employer. It also includes background and verification data such as a copy of passports or utility bills as well as other information we require to comply with our obligations under anti-money laundering legislation.

<b>Contact Data</b>	This includes email address, phone number, postal address, billing address.
<b>Financial Data</b>	This includes financial data such as your account status and history, transaction data, contract data, details of the Credit Union products being used. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, mortgage details, other loans and debts, previous addresses, spouse, partners.
<b>Correspondence Data</b>	If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence.
<b>Marketing Data</b>	This includes your preferences in receiving marketing from us and your communication preferences.
<b>Web Data</b>	When you apply online we collect details such as username and password in order to create an account, information about your interactions with the online loan facility such as your IP Address, time and date of interactions and the progress of your application.

#### 4. Processing Activities

*We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.*

<b>We have to process Personal Data legally. As a regulated entity much of the data that we process is required to meet with a regulatory obligation or in order to deliver Credit Union member services to you. If we look for consent, we will always ensure that Credit Union Members know what they are consenting to.</b>		
<b>Purpose of Processing:</b>	<b>Categories of Personal Data:</b>	<b>Lawful Basis:</b>
Member Application and account set-up and administration;	Identification Data Contact Data Correspondence Data Financial Data	Contract
To maintain your account;  To enable you to transact on your account;  To provide you with information about the operation of your account;	Identification Data Contact Data Correspondence Data Financial Data	Contract
To administer the ILCU Savings Protection Scheme;  To administer insurance products and services offered to Credit Union members such as Life Savings, Loan Protection, Death Benefit Insurance and Disability Cover;	Contact Data Financial Data	Contract

<p>To offer you additional services associated with Credit Union membership such as online banking, foreign exchange services and loan facilities;</p> <p>To keep you informed of new Credit Union services that may be of interest to you;</p>	<p>Contact Data</p> <p>Marketing data</p>	<p>Legitimate Interests</p> <p>Consent</p>
<p>To comply with our legal obligations in respect of the collection of taxes, levies, contributions;</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Data</p>	<p>Legal Obligation</p>
<p>To interact with the regulator and the Central Bank of Ireland for reporting, compliance and auditing purposes;</p> <p>To engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Correspondence Data</p> <p>Financial Data</p>	<p>Legal Obligation</p>
<p>To comply with legal obligations connected with “know your customer” requirements under anti-money laundering laws, or under counter terrorist financing law;</p> <p>To carry out Customer Due Diligence (CDD) and Enhanced Due Diligence (EDD).</p>	<p>Identification Data</p> <p>Contact Data</p> <p>Financial Data</p>	<p>Legal Obligation</p>

## 5. Sources of Personal Data

*We have set out below the sources of personal data we collect.*

We receive information about you initially when you join Life Credit Union and open an account with us. We will ask you for certain information to be provided during the membership application process.

This information is collected from you directly through the Membership application form or from you and other people with whom you operate a Life Credit Union account such as a joint account

We receive information from you during the course of your relationship with us such as:

- updates to your account information should any of your account details change;
- information related to transactions on your account;
- information you supply when you communicate with us about the operation of your account;
- information you supply when you take up our services such as applying for loans or activating an online banking facility.

We may collect your Personal Data from a 3rd party when we conduct background checks, including “know your customer” checks.

We may receive information about you from a representative when they transact on your account or communicate with us on your behalf.

## 6. Retention of Member Information

*We only keep your Personal Data as long as it is necessary for the purposes of processing it or to comply with legal or regulatory requirements.*

Our retention policy is as follows.	
Purpose:	Retention Period:
Member Application and account set-up and administration	Account closure + 7 years
Budgeting services such as BillPay, MABS and budget accounts	Account closure + 7 years
Member Insurance Services	Account closure + 7 years
Other member benefits including competitions and member draws	12 months
Marketing and promotion of our business	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe
Administration of our relationship	Account closure + 7 years Correspondence Data

Note that this section of the Credit Union Data Protection Statement relates only to how we process data relating to membership of the Credit Union.

We provide information about how we process your data when you interact with any of the Credit Union Services such as Loans; website; online banking; and other general services offered by the Credit Union on a service by service basis. For further information relating to (i) how to exercise your rights, (ii) who your Personal Data may be shared with (including cross border transfer); (iii) the security measures we have implemented and the contact details for the Data Protection Commission in Ireland you should read the full [Life Credit Union Data Protection Statement here](#).