

# Online Lending Privacy Notice

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The data controller is Blanchardstown & District Credit Union Ltd  
Unit 9/10, Blanchardstown Business Centre, Clonsilla Road,  
Blanchardstown, Dublin 15, D15 FP92  
Tel: 01 820 3495  
Email: [info@blanchardstowncu.ie](mailto:info@blanchardstowncu.ie)

Our Data Protection Officer can be contacted by e-mailing [dpo@blanchardstowncu.ie](mailto:dpo@blanchardstowncu.ie), or by post at the address above.

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

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

**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
- our on-line loan application supplier (Visualyse [www.graphicalfinancialanalysis.com/](http://www.graphicalfinancialanalysis.com/))
- 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

**Personal data about you received from a third party** –

*Credit Agencies:* 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 guarantor is involved the guarantor's details are also consulted with CCR. The lawful basis for this processing is compliance with a legal requirement.

The credit union may consult with the CCR in circumstances where the loan application value is below €2,000<sup>1</sup>. The lawful basis for this processing is compliance with a legal requirement.

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<sup>1</sup> Under The European Communities (Consumer Credit Agreements) Regulations 2010 (S.I. No 281 of 2010) we are required to 'assess the consumer's creditworthiness on the basis of sufficient information'. In the Lending Section of the Credit Union Handbook (version March 2020) in assessing a borrower's creditworthiness, the Central Bank of Ireland expects credit unions to 'satisfy themselves that they are fully appraised of the

The credit report we receive contains your personal and credit information, as follows:

| PERSONAL INFORMATION includes   | CREDIT INFORMATION includes   |
|---|---|
| Name (forename & surname)<br>Current and previous addresses<br>Date of birth<br>PPSN<br>Gender<br>Eircode<br>Telephone number | Type of loan (credit card, mortgage, overdraft)<br>Name of the lender<br>Amount of the loan<br>Outstanding balance<br>Number of overdue payments (if any)<br>Date of next payment<br>Amount of next payment |

**Open Banking:** The introduction of Open Banking under the second Payment Services Directive (PSD2) allows authorised and regulated companies known as Account Information Service Providers (AISP) to ask an individual or business for permission to connect to their bank account and extract relevant bank account information for safe transfer to another financial institution.

As part of our on-line loan application process, members now have the option to use an AISP (Truelayer (Ireland) Ltd). This means that, with your consent, you can grant the credit union temporary access to electronic copies of your bank statements / transactions. This facility is intended to speed up the loan assessment process, in that you will not need to forward printed copies. The credit union does not get access to your bank account, only to the extracted information you consent to.

All members still have the option to send in hard copy printouts of bank statements.

**Retention of your data** – In a successful application for credit, in compliance with legal requirements for record keeping, loan applications, loan assessment forms and 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. Reports received from the CCR are not retained beyond loan assessment.

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

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

**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

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borrower's financial position before granting a loan', and to be 'fully satisfied as to a member's creditworthiness and ability to service all debts before advancing any new credit or top up credit facilities'.

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

Failure to provide electronic access to bank transaction / statement information means you will need to provide these in hardcopy to the credit union, and your application will not be able to proceed until these have been received.

**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 solely on this system.

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 available from our website, the DPO, or the Manager.



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[www.blanchardstowncu.ie](http://www.blanchardstowncu.ie)

**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, whose contact details are as follows:

|  |                                     |
|--|-------------------------------------|
| Telephone +353 (0)1 765 0100 / 1800 437 737  | Address: Data Protection Commission |
| E-mail <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>                          | 21 Fitzwilliam Square South         |
| Web: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a> | 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.blanchardstowncu.ie](http://www.blanchardstowncu.ie)**