

	Guarantor Privacy Notice of Progressive Credit Union Limited.
Form Number: PCU. F131	Rev: 1.2 Effective Date: 01/10/2021

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, contact details, identification documents, financial status, employment details, salary, and credit rating.

Purpose for which we process your personal data

- To ensure repayment of the loan and to facilitate the requirements of the contract between you and the credit union.
- To contact you in respect of your guarantee in the event of the change of circumstance of the member or the member getting into arrears.
- Collection of the debt.
- Conduct due diligence.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

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. We document the reasons for our retention periods and where possible, the retention periods themselves in our Retention Policy. Your details will be held for six years following the date of discharge, transfer or repayment of the loan.

Once the retention period has expired, the respective data will be permanently deleted. If you require further information please contact us.

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

How we may share the information

We may also need to share some of the above categories of personal data with other parties, such as the Irish League of Credit Unions (ILCU)¹ and our advisers such as solicitors, debt collectors or auditors. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal data with our regulator the Central Bank of Ireland or regulatory authorities as required to comply with the law.

The Privacy Notice of the ILCU is available at www.creditunion.ie.

¹The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring (audit) services to affiliated credit unions. We may disclose information in the guarantee form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

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.

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 contract, see details below:

The purpose of this guarantee is in furtherance of this contract.



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

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”).



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, see details below:

Credit search on the CCR: 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 to which you act as guarantor.

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

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 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 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.

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 straightaway if there are any changes to your personal data. If you wish to avail of either of these rights, please contact us at:

Progressive Credit Union

43-45 Dublin Street

Balbriggan

Co. Dublin

K32NX58