

## PRIVACY NOTICE (Detailed Version)

Here at Sheffield Credit Union (SCU) we take your privacy seriously and will only use your personal information to administer your account and to provide the products and services you have requested from us. By means of this privacy notice, you also have the right to be duly informed of all the required information you need to know about us, what happens to your data and your general rights under the Regulations.

### **1. Information about our offices:**

Sheffield Office: 35 Townhead Street, Sheffield, S1 2EB (registered office) (01142760787)

### **2. What type of information is collected from you and how do we collect it?**

Personal data is data which can be used to confirm your identity. This may include your name, date of birth, address, telephone number and other basic personal details. Most data that we would hold is collected directly from you via paper forms, online forms, emails, telephone calls or face to face interactions. We will sometimes collect data from third parties who you have authorised to do this for you, or in the event of collecting unpaid debts or establishing your whereabouts in order to contact you or your beneficiary to fulfil our contract with you, from publicly accessible sources.

### **3. How do we use your personal information?**

#### **a) For legal reasons:**

- In order to comply with legal obligations such as anti-money laundering checks and fraud prevention. This may include checking your ID via an online ID check on an annual basis;
- To carry out internal and external auditing;
- To record basic information about you on a register of members.

#### **b) For performance of our contract with you:**

- To deal with your account(s) or run any other services we provide to you;
- To consider any applications made by you and anything which you have provided your consent for. You can withdraw such consent at any time by notifying us and you can also request that we cease processing your details any longer (as per instructions below);
- To help us to make credit decisions about you and anyone to whom you are linked financially or other members of your household, and to recover debts that fall into arrears and are not repaid after reasonable attempts have been made to re-instate repayments;
- For statistical analysis; financial risk assessment; compliance/regulatory reports, and debt tracing;
- To send you statements, new terms and conditions, information about changes to the way your account operates and notification of our annual AGM.

#### **c) For our legitimate interests:**

- In order to recover any debts owed to us.

**d) With your consent:**

- In order to maintain our relationship with you including marketing and market research (if you agree to them). You can object to the processing of your data for marketing reasons, and request to withdraw your consent should you wish.

**4. How is your information used?**

Processing of data is very broadly defined as any operation or a set of operations on the data including: Collecting, recording, organising, structuring, using, consulting, holding, storing, retrieving, amending, copying, erasing, destroying, disclosing by transmitting, disseminating or otherwise making available, sharing with our third parties suppliers (as provided in sections 6 & 7 of this Privacy Notice), securing, transferring, restricting (with the aim of limiting processing of data in future) and profiling. This list of operations is not exhaustive.

**5. Where will we store and send your information?**

The record of your data will be stored in an electronic database system accessed only by authorised individuals. Your information may also be stored on a paper file held securely within the SCU offices. All servers that store your information do so securely and are held within the EU.

When complying with international tax regulations, we may be required to report personal information to HM Revenue & Customs who may then transfer that information to tax authorities in countries where you or a connected person may be tax resident.

**6. Who might we share your information with?**

We will share your information as required only:

- With our third party agents/suppliers or subcontractors for operational reasons such as confirming your identity, processing debit card payments, providing secure online services and transmitting documents or data e.g. for signature by email;
- With any persons, including, but not limited to, insurers, who provide a service or benefits to you or for us in connection with your account(s);
- To licensed credit reference agencies for example: Experian and debt recovery agents who may check information against other databases;
- To fraud prevention and other agencies to help prevent crime or where we suspect fraud;
- To any authorities if compelled to do so by law (e.g. HM Revenue & Customs to fill tax compliance obligations and the Department of Work and Pensions (DWP) on request for specific information;
- Members making a legitimate request to view the members' register (only permitted in supervised environment with access restricted to essential details required for legitimate purpose e.g. member seeking support from other members to call a Special General Meeting).
- For the purpose of compliance and regulatory reporting and to confirm your identity for money laundering purposes, which may include checking the electoral register.
- For the purposes of email marketing which may require our third party company to collect and process personal information about you as an email recipient and to respond to your support services' enquiries as appropriate. Email marketing shall only apply if you opt in to email marketing when giving us your marketing preferences.

## **7. Credit Reference Agencies, Open Banking and email marketing provider**

Should you apply for a loan, we will supply your personal information to credit reference agencies (CRAs) and exchange information about you on an ongoing basis for the purpose of processing your loan applications. You can read our summary of how we share your personal information with CRAs in more detail on our website at [www.sheffieldcreditunion.com/crain](http://www.sheffieldcreditunion.com/crain) or by requesting a loan application form. The full document is available via this page on our website, or directly from:

TransUnion (formerly CallCredit) at [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain)

Equifax at [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)

Experian at [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

If applying for a loan you may also opt to send us your recent bank transaction data via a secure third party open banking provider rather than providing copies of your bank statements. To use this service, you will give your consent to your bank, as well as our third party AccountScore / Consents Online before the transfer is carried out. You will be able to amend your consent and permissions via Consent Online's portal following the transfer. AccountScore / Consents Online is an FCA registered Account Information Service Provider. This service is optional and hard copies of bank statements will still be accepted with a loan application.

According to your marketing preferences, you will receive emails with marketing and promotional information via our third party supplier Campaign Monitor as indicated in point 6. You can read more about how your information will be shared with this company directly from their website's terms of use as indicated below. Please refer specifically to Section 3 entitled "Campaign Monitor's users' subscribers (email recipients)" in this regard.

<https://www.campaignmonitor.com/policies>

## **8. How long do we keep your information for?**

Sheffield Credit Union will need to hold your information for varying lengths of time depending on what we use that data for and the regulations that are relevant to that information. In many cases we will hold information for a period of time after you have left the Credit Union. To request a copy of our policy on retaining member data (including CCTV recordings), please contact us by emailing [admin@sheffieldcreditunion.com](mailto:admin@sheffieldcreditunion.com) or calling our mainline on 01142760787.

## **9. What are your 8 rights under the General Data Protection Regulations?**

- a) Right to be informed – you are being informed by means of this privacy notice;
- b) Right of access – access to your personal data upon your written request free of charge;
- c) Right to rectification – you are entitled to have your personal information corrected if it is inaccurate or incomplete;
- d) Right to erasure or 'right to be forgotten' – enables you to request the deletion or removal of personal data (under certain circumstances);
- e) Right to restrict processing – you specifically ask for your data not to be processed (ask us under which circumstances);
- f) Right to data portability - you have the right to obtain and reuse your personal data for your own purposes across different services;
- g) Right to object – you can object to certain situations (ask us under which circumstances);
- h) Right not to be subject to automated decision-making including profiling.

Although we use tools to assist in decision making, including an ID checking tool and a credit checking tool, we do not fully automate these decisions. All decisions are made on an individual basis by appointed staff members, and the tool is simply used to provide data that we need in order to consider the situation in a fair and consistent manner. We do not undertake profiling as part of our organisational processes.

<b>Your Rights</b>	<b>What Does It Include?</b>	<b>Time Frame</b>	<b>Exceptions</b>
<b>b) Right of access</b>	<ul style="list-style-type: none"> <li>-Confirmation that your data is being processed;</li> <li>-Access to your personal data;</li> <li>-Supplementary information about the processing, as described above.</li> </ul>	<p>1 Month</p> <p>Possible to extend the period by a further two months where requests are complex. We will inform you of this within 1 month of receipt.</p>	<p>Where requests are unfounded or excessive, we may:</p> <ul style="list-style-type: none"> <li>-charge a reasonable fee (i.e. related to the costs of administration); or</li> <li>-refuse to respond to the request.</li> </ul>
<b>c) Right to rectification</b>	You are entitled to have personal data rectified if it is inaccurate or incomplete.	1 Month, may be extended by 2 months if the rectification is particularly complex.	Where the credit union decides not to take action in response to a request for rectification, it must explain the reason to the individual and inform them of their right to submit a complaint.
<b>d) Right to erasure or 'right to be forgotten'</b>	<p>Enables you to request the deletion or removal of personal data:</p> <ul style="list-style-type: none"> <li>-Where your personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.</li> <li>-When you withdraw your consent, where the grounds of processing is based on your consent.</li> <li>-When you object to the processing and there is no overriding legitimate interest to continue the processing.</li> <li>-The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).</li> <li>-The personal data has to be erased in order to comply with a legal obligation.</li> <li>-The personal data is processed in relation to the offer of information society services (online services) to a child,</li> </ul>	1 month from date of request	<p>We may refuse your request for erasure of personal data and this is:</p> <ul style="list-style-type: none"> <li>-when we need to process it to exercise the defense of legal claims,</li> <li>-to comply with a legal obligation,</li> <li>-to exercise the right of freedom of expression and information</li> <li>-for archiving purposes in the public interest, scientific research, historical research, or statistical purposes</li> </ul>

<p><b>e) Right to restrict processing</b></p>	<p>-Where you contest the accuracy of the personal data, we restrict the processing until you have verified the accuracy of the personal data.</p> <p>-Where you object to the processing (where it was necessary for the purpose of legitimate interests), and we are considering whether our legitimate grounds override yours.</p> <p>-When processing is unlawful and you oppose erasure and request restriction instead.</p> <p>-If we no longer need the personal data but you require the data to establish, exercise or defend a legal claim.</p>	<p>1 month from date of request</p> <p>We are permitted to store the personal data but not further process it.</p>	<p>Nil</p>
<p><b>f) Right to data portability</b></p>	<p>You have the right to obtain and reuse your personal data for your own purposes across different services. This should be proved in a structured, commonly used and machine readable format e.g. CSV files. This enables other organisations to use the data</p>	<p>1 Month</p> <p>Can be extended by 2 months if the rectification is particularly complex.</p>	<p>This data is not limited to information provided directly by the individual but also extends to data generated by the activity of that individual.</p> <p>Where the credit union decides not to take action in response to a request for rectification, it must explain the reason to the individual and inform them of their right to submit a complaint.</p>
<p><b>g) Right to object</b></p>	<p>You have the right to object to:</p> <ul style="list-style-type: none"> <li>-Processing based on legitimate interests</li> <li>-Direct marketing (including profiling); and</li> <li>-Processes for the purposes of scientific/historical research and statistics</li> <li>-Performance of a task in the public interest/exercise of official authority (including profiling)</li> </ul>	<p>1 calendar month from date of objection</p>	<p>The credit union must stop processing the personal data based on legitimate interests unless:</p> <ul style="list-style-type: none"> <li>-it can demonstrate compelling legitimate grounds for processing which override your interests, rights and freedoms;</li> <li>-there is the defence of legal claims.</li> </ul>

<b>h) Right not to be subject to automated decision-making including profiling</b>	Members have the right not to be subject to a decision when:  -It is based on automated processing; and  -It produces a legal effect or similarly significant effect on the individual (such as the refusal of an online credit application or e-recruiting practices)	No time limit established	This right does not apply if the decision  -does not have a legal or significant effect on the individual -is necessary for entering into or perform a contract between you and the credit union -is authorised by law and with suitable safeguards to protect your rights, freedoms and interests -is based on explicit consent
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#### **10. Your right to lodge a complaint with the supervisory authority (ICO)**

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner’s Office (ICO) which is the organisation responsible for data protection in the U.K. You can contact them by:

- a) Going to their website at: <https://ico.org.uk>
- b) Telephone on 0303 123 1113
- c) Post to Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

#### **11. Contact us about your rights**

For more information about how your rights apply to your membership of the credit union or to make a request under your rights you can contact us by emailing [admin@sheffieldcreditunion.com](mailto:admin@sheffieldcreditunion.com) or writing to our Sheffield office. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay.

#### **12. Changes to this Privacy Notice**

We reserve the right to update this Privacy Notice at any time and recommend that you check regularly on our website for updates. We won’t alert you for every small change, but if there are any important changes to this notice or how we use your information we will let you know and where appropriate ask for your consent.

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