

## Our Privacy Policy

Stranraer Credit Union understands the need to mitigate the risk to personal data, and we are committed to protecting and respecting your privacy.

Reference to “we”, “us”, “our” or “the credit union” is a reference to Stranraer Credit Union and for the purpose of the General Data Protection Regulation (GDPR) the data controller is Stranraer Credit Union, registered address as given below.

This Policy sets out the lawful basis and specified purposes in which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. Please consult the Cookie Usage Policy for further information on how we and our Service Providers may use data we gather from you online.

On an annual basis, we will send requests to our members to ensure data held is kept updated.

Stranraer Credit Union is registered in Scotland and has its registered office at 25 Hanover Square, Stranraer, DG9 7AG.

Stranraer Credit Union is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority. Financial Services Registration No. 213928.

The credit union does not consider its controlling of and processing of data to be on a large enough scale to employ a Data Protection Officer. All Directors, staff & volunteers are subject to continuous training in the importance of Data Protection. The credit union has a Data Protection representative who ensures this policy is reviewed no less than annually and will assist with queries raised by the membership, Directors, staff and volunteers.

You can read our full Privacy Policy so that you may feel confident about the privacy and security of your personal information.

### STRANRAER CREDIT UNION PRIVACY POLICY

We are committed to protecting our members' privacy. The credit union requires any information marked as mandatory for membership to either meet legal obligations or to enable us to perform our contract with you. Where you are not able to provide us with this information, we may not be able to open an account for you. Where we request further information about you not required for these reasons, we will ask you for your consent.

## HOW WE USE YOUR PERSONAL INFORMATION

Stranraer Credit Union may process, transfer and/or share personal information in the following ways:

For legal reasons, in order to;

- confirm your identity
- perform activity for the prevention of financial crime
- carry out internal and external auditing
- record basic information about you on a register of members

For performance of our contract with you, in order to;

- deal with your account(s) or run any other services we provide to you;
- consider any applications made by you;
- carry out credit checks and to obtain and provide credit references
- undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business
- To send you statements, new terms & conditions (including changes to this privacy statement), information about changes to the way your account(s) operate and notification of our annual general meeting.

For our legitimate interests, in order to;

- recover any debts owed to us

With your consent, in order to;

- maintain our relationship with you including marketing and market research (if you agree to them).

## SHARING YOUR PERSONAL INFORMATION

We will disclose information outside the credit union, only:

- to third parties to help us confirm your identity to comply with money laundering legislation
- to credit reference agencies and debt recovery agents who may check the information against other databases - private and public - to which they have access to
- to any authorities, if compelled to do so by law (e.g. to HM Revenue & Customs to fulfil tax compliance obligations)
- to fraud prevention agencies to help prevent crime or where we suspect fraud;
- to 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 our suppliers in order for them to provide services to us and/or to you on our behalf
- to anyone in connection with a re-organisation or merger of the credit union's business
- other parties for marketing purposes (if you agree to this)

## WHERE WE SEND YOUR INFORMATION

While countries in the European Economic Area all ensure rigorous data protection laws, there are parts of the world that may not be quite so rigorous and do not provide the same quality of legal protection and rights when it comes to your personal information.

The credit union does not directly send information to any country outside of the European Economic Area, however, any party receiving personal data may also process, transfer and share it for the purposes set out above and in limited circumstances this may involve sending your information to countries where data protection laws do not provide the same level of data protection as the UK.

For example, when complying with international tax regulations we may be required to report personal information to the HM Revenue and Customs which may transfer that information to tax authorities in countries where you or a connected person may be tax resident.

## RETAINING YOUR INFORMATION

Stranraer Credit Union will need to hold your information for various lengths of time depending on what we use your data for. In many cases, we will hold this information for a period of time after you have left the credit union.

For a copy of our Policy for Data Retention please contact Stranraer Credit Union on; 01776-706911.

## CREDIT RATING AGENCIES

In order to process any credit applications you may make, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as details about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

We may exchange information about you with CRAs, including details about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. This may affect your ability to get credit. The identities of the CRAs, and the ways in which they use and share personal information are explained in more detail on:

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

Your rights under data protection regulations are:

- The right to access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object to data processing
- Rights related to automating decision-making and profiling
- Right to withdraw consent
- The right to complain to the Information Commissioner's Office

Your rights explained:

#### RIGHT TO ACCESS

You have the right to access your personal data and details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you, on request, a copy of your personal data.

#### RIGHT TO RECTIFICATION

You have the right to have any inaccurate personal data about you corrected and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

#### RIGHT TO ERASURE

In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include when:

- the personal data is no longer needed for the purpose it was originally processed
- you withdraw consent you previously provided to process the information
- you object to the processing under certain rules of data protection law
- the processing is for marketing purposes
- the personal data was unlawfully processed

However, you may not erase this data where we need it to meet a legal obligation or where it necessary for the establishment, exercise or defence of legal claims.

#### RIGHT TO RESTRICT PROCESSING

In some circumstances, you have the right to restrict the processing of your personal data. Those circumstances are when:

- you contest the accuracy of the personal data;
- processing is unlawful but you oppose erasure;

- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and
- you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data.

Otherwise, we will only process your information:

- with your consent;
- for the establishment, exercise or defence of legal claims; or
- for the protection of the rights of another natural or legal person;

## RIGHT TO OBJECT TO PROCESSING

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the data is necessary for the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

## RIGHT TO DATA PORTABILITY

To the extent that the legal basis for our processing of your personal data is:

- consent; or
- that the processing is necessary for the performance of our contract with you;

You have the right to receive your personal data from us in a commonly used and machine-readable format or instruct us to send this data to another organisation. This right does not apply where it would adversely affect the rights and freedoms of others.

## RIGHTS RELATED TO AUTOMATIC PROCESSING

Stranraer Credit Union may from time to time use an automated decision-making process to process members' loan applications to make sure that our decisions are quick, fair, efficient, and correct based on what we know.

The automated lending decision system looks at your credit score alongside information such as:

- the amount applied for
- your income and expenditure
- your history of repaying debts
- the number and value of PTDs, DASs, IVAs, CCJs you have
- the number of accounts you have that are in default
- public information such as the insolvency service
- whether or not you are bankrupt
- your age

and makes a decision based on either

- Set policies e.g. the credit union does not lend to those less than 18 years of age, or the credit union does not lend to people with over a certain value of county court judgements.
- The predicted likelihood of the repayment of the loan based on the statistical analysis of whether individuals who had a similar credit profile repaid their debts in the past.

Members have the right to have the decision reviewed by a member of staff, express their point of view, and obtain an explanation of the decision and challenge it. A copy of our Policy for Lending can be obtained by contacting the credit union.

#### RIGHT TO WITHDRAW CONSENT

To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

#### RIGHT TO COMPLAIN

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 which is responsible for data protection in the UK. You can contact them by:

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

#### CONTACT US ABOUT YOUR RIGHTS

For more information about how your rights apply to your membership of Stranraer Credit Union or to make a request under your rights, you can contact us via email at [Stranraer\\_cu@tiscali.co.uk](mailto:Stranraer_cu@tiscali.co.uk) or telephone 01776706911. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay.

Our contact address details are:

Stranraer Credit Union Ltd.

25 Hanover Square

Stranraer

DG9 7AG

Telephone 01776-706911

Email [Stranraer\\_cu@tiscali.co.uk](mailto:Stranraer_cu@tiscali.co.uk)

#### CHANGES TO THIS PRIVACY POLICY

We can update this Privacy Notice at any time and ideally you should check it regularly at our registered office. We won't alert you to every change, but if there are any important changes to this Notice and/or how we use your information we will let you know and where appropriate ask for your consent.

Correct as of 11th August 2018