

Introduction

Ballyshannon and Killybegs Credit Union respects the rights of users of our website and is committed to protecting your privacy and ensuring that you continue to trust us with your personal data.

“Personal Data” is personal information about you as an individual such as your name, email address, address, telephone number and any information relating to you that we hold.

We will not collect your personal data on this website without your permission or otherwise in accordance with Data Protection legislation.

This Privacy Notice sets out:

1. Third party web sites
2. Scope
3. Acceptance
4. What personal data we collect and why we collect it
5. Consent
6. Who we share your personal data with
7. Your rights
8. Data security and retention
9. Information Security and Data Privacy awareness
10. How to contact us

1. Third Party Websites

Our web site contains links to other web sites. We are not responsible for the privacy practices of these other sites. We encourage you to be aware of this when you visit these sites and to read the privacy statements on other web sites you visit. This Privacy Notice applies solely to our web site.

2. Scope

This Privacy Notice applies to the personal data that we collect about you on our website or mobile application for the purpose of operating the website and providing

- information about your Credit Union
- access to your account details and transactions (CU Online)
- feedback features
- online membership and loan application facilities
- control over your contact preferences

3. Acceptance

By using our website or mobile application or by giving us your personal data, you accept the practices described in this Privacy Notice. If you do not agree to this Privacy Notice, please do not use our website or mobile application or give us any of your personal data.

We reserve the right to make changes to this Privacy Notice at any time and we encourage you to review this notice regularly to make sure you are aware of any changes and how your personal data may be used.

4. What personal data we collect and why we collect it

4.1 Information that you provide to us

When you submit an enquiry to us via our Enquiry Form or submit feedback, we ask that you submit your member number (optional), your name and email address along with your query or feedback. We ask for this information so that we can respond to your query.

When you apply for a loan via our website we will ask for information necessary to process your loan request such as Credit Union account details, your name, address, contact details, date of birth, marital status, accommodation details, employment and salary information and current debt information.

If you apply for membership of the Credit Union via our website we will ask for your name, address, phone number(s), email address, date of birth, employment and accommodation information.

If you register for Online Access we will ask for your Credit Union member number, your name, date of birth, phone number and email address. This information is necessary to process your application for Online Access.

If we issue you a debit card, Transact Payments Malta Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their privacy policy which is available at: [tpl-privacy-policy.pdf \(currentaccount.ie\)](#)

4.2 Data gathered from all visitors to our website

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns.

We do this to understand how our website is used by our visitors, for example how often various parts of the site are visited. This information is stored in an anonymous manner and you are not identified by this information.

We also gather the following technical details about visits.

- Your IP address
- Your web browser and operating system
- Date and time you visited various pages on our website

We also store cookies on your computer.

4.3 What are Cookies?

Cookies are files which are transferred to your computer's hard disk by a website. Cookies can store information about your preferences and other information which you need when you visit a website.

The Credit Union uses cookies to monitor our website traffic, to ensure better service levels and in order to provide you with certain features such as the customised delivery of certain information.

To prevent the use of cookies you should activate the facility which is available in most web browsers that enables a user to deny or accept cookies. Click [here](#) to find out how to enable and deny cookies.

For more information about cookies see www.allaboutcookies.org

4.4 Why do we collect your personal data and what do we do with it?

We collect data for the following purposes

- to enable the correct functioning of this website
- to allow us to process queries or feedback that you submit to us
- to process applications for membership, access or credit that you submit to us

All the personal data that you submit is processed in the Credit Union by our staff. However, for the purposes of IT hosting and maintenance some of this information is located on servers within the European Union.

4.5 Are there consequences to not supplying Personal Data?

We need to collect your personal data in order to process your applications for membership, credit or online access. If you do not supply the information required we will be unable to process your application.

5. Consent

5.1 What consent do we ask for?

We will ask you for your consent to process loan application information (including disclosing it to third parties necessary for its processing) and to submit your information to a Credit Check bureau. You may decline to grant this consent however without this consent we will be unable to process your application.

We may also ask for your permission to send you marketing material about carefully selected products and services that we feel would be of interest to you. You may decline to grant this permission without consequence.

5.2 Can I withdraw my consent at any time?

Yes. You must be logged in as a Credit Union user in order to manage your consent online. When logged in you may manage your consent by clicking [here](#).

Alternatively, you may write to us or call into the Credit Union at Ballyshannon and Killybegs Credit Union, Main Street, Killybegs, Co Donegal.

6. Who we share your personal data with

We may share personal and anonymous information with agents, subsidiaries, affiliates, partners and other third parties that perform functions on our behalf, such as hosting, billing, content management tools, analytics, customer service, fraud protection and debt collection. These entities have access to the Personal Information needed to perform their functions and are obligated to maintain the confidentiality and security of that Personal Information. The Service Providers are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services.

6.1 Information Technology service providers

We have engaged third parties for the supply of Information Technology services which allow us to process your information. These parties process your information under contract to us and are subject to the same European and national Data Protection laws as are we.

6.2 Transfer of information

We do not transfer your information outside of the EU.

Your information is processed entirely within the EU and, as such, is protected by European-wide Data Protection regulations.

7. Your rights

You have the following rights: You have rights under the Irish Data Protection Acts 1988 and 2003 and EU GDP Regulations.

You have the right to ask us not to process your personal data for marketing purposes and to 'opt out' from consent. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at marketing@bkcreditunion.ie

You also have the right to access information held about you. Your right of access can be exercised in accordance with the Acts and Regulations. Any data access request may be made in providing you with details of the information we hold about you, requests can be made via dataprotection@bkcreditunion.ie

Your obligations in using the site are to provide true, accurate, current and complete information. If Ballyshannon & Killybegs Credit Union has reasonable grounds to suspect that such information is untrue, inaccurate, not current or incomplete, Ballyshannon & Killybegs Credit Union has the right to

suspend or terminate your account and refuse any and all current or future use of the Site (or any portion thereof). You are entirely responsible for the security and confidentiality of your password and account. Furthermore, you are entirely responsible for any and all activities that occur under your account.

7.1 Access

You have the right to obtain from us confirmation as to whether or not we hold your personal data. Where that is the case, you have the right to request a copy of the data and information about it such as how long we will hold it and to whom we disclose it.

7.2 Rectification

Where your personal data is incorrect or out of date you have the right to submit a correction and require us to correct your data.

7.3 Erasure

Where your personal data is no longer required for the purposes for which it was gathered and we have no regulatory obligation to retain it, you may instruct us to erase it.

7.4 Restriction

You may require us to restrict processing of your data under certain circumstances.

7.5 Object

You can object to certain types of processing, in particular any direct marketing.

7.6 Data Portability

You can request a copy of your personal data in a structured, commonly used, machine-readable and interoperable format for transmission to another controller.

7.7 Withdrawal of Consent

Where our processing of your data is based on consent – for example, marketing – you may withdraw that consent at any time. You must be logged in to manage your consent online. Click [here](#) to manage your consent.

7.8 Lodge a Complaint

You may lodge a complaint with a Supervisory Authority in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data infringes Data Protection law.

8. Data Security and Retention

We do not retain your personal information for longer than we need to in order to meet the objectives for which it was gathered.

When we are moving your data from one location to another, whether physically or digitally, your data will be encrypted. Where appropriate, data will be encrypted at rest.

All information you provide to us through CU Online is stored on secure servers. Any payment transactions undertaken through CU Online are encrypted using SSL technology. You must keep your PIN, Password and Username for CU Online, and any other security device we give you, safe and secure.

You should log off CU Online and your Online Account when finished using CU Online. The use of the Internet, by its nature, is not always secure. As a result, while we have reasonable IT security measures in place, we cannot guarantee the security or privacy of communications made over the Internet including any related to CU Online, the Online Services or your Online Account.

You are responsible for providing all you require to safely and properly access and use CU Online and the Online Services including a computer, an Internet connection and security software.

Please understand, however, that while we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure. We review our security procedures to consider appropriate technology and methods to secure information and take steps to keep your personal information safe.

9. Information Security and Data Privacy awareness

We provide Information Security and Data Privacy awareness training to all of our staff and we require any of our contracted suppliers who process your data to also provide similar awareness training to their staff.

9.1 Children's Privacy

Ballyshannon & Killybegs Credit Union is concerned about children's privacy. The websites that we operate provide a forum for all of our members, including children, to view our products and what is happening in our Credit Union world. While we encourage children to participate appropriately in our websites, their privacy is extremely important to us. This Children's Privacy Statement explains our information practices in connection with information provided by children under the age of 16 on websites that link to this Children's Privacy Statement. The websites are controlled and operated by us from Ireland and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the Republic Of Ireland. Our goal is to minimise the information gathered from and disseminated about children under 16 while permitting them active participation in the trustworthy information, education and independent voice for which Ballyshannon and Killybegs Credit Union is known.

A. How We Collect and Use Information from Children

Children can explore the websites, and can view and print reviews, comments and other content without providing any personal information. We do not permit children under 16 years of age to become an on-line banking user. We may use information collected from children during the exploration of our Sites in the following manner:

To confirm the child's account

To determine the child's current age in order to respond to any queries in an appropriate manner.

Children may post comments on our websites provided they are eligible users of said websites. We moderate all postings including children's postings to remove personal information, and **we encourage parents to discuss with their children why they should NEVER include personal information in comments posted to the websites.** Children may also participate in other online activities, such as polls. All members, including children, have the ability to delete their postings to the websites. Or the member can send an email requesting deletion to website@bkcreditunion.ie noting their name and date of the comment. It is possible that deleted reviews or comments will

remain in our system (such as in backups of our data), but they will not be visible through the Sites. Please note that your request or deletion does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been re-posted by another user.

When children interact with the websites, certain technical information may automatically be collected, both to make our websites more interesting and useful and for various internal purposes related to our business. Examples of information that is automatically collected include: the type of computer operating system, the device's IP address or mobile device identifier, the web browser, the frequency with which the child visits various parts of our websites, and information regarding the online or mobile service provider. This information is collected using technologies such as cookies, flash cookies, web beacons, and other unique identifiers (which we define under the "Use of Cookies" section of our general Privacy Policy). This information may be collected by us or by a third party. Persistent identifier information is used by Ballyshannon & Killybegs Credit Union for the sole purpose of providing support for our internal operations, including in order to:

Ensure that the websites function properly

Enable us to conduct research and analysis to understand, address and improve the use and performance of the websites, and

Diagnose and respond to problems

We may work with third parties to perform site analytics and provide services to keep your user experience on the Site free of spam.

B. What Information About Children Is Shared?

We do not disclose to third parties any children's personal information that we collect other than as follows, consistent with applicable law: (a) with a parent's permission, (b) as required by any applicable law, (c) to third-party service providers who help us operate or manage the Sites, (d) as part of aggregated data shared with third-party service providers, (e) to comply with legal process, (f) to respond to governmental requests, (g) to enforce our Terms of Service, (h) to protect our operations, (i) for assistance in fraud detection and prevention; (j) to protect the rights, privacy, safety or property of Ballyshannon & Killybegs Credit Union, your child or others, (k) to permit us to pursue available remedies or limit the damages that we may sustain, and (l) in connection with a disposition of all or a substantial portion of our business, assets or stock, such as a sale, merger, consolidation, reorganisation, joint venture, assignment, or bankruptcy or similar proceedings.

C. How May Parents Access, Change or Delete Information about Their Child?

Parents may at any time access or change the personal information that we have collected online from their children. Parents may also ask us to cease further collection of personal information from their children, or to make no further use of, or delete, the personal information we have collected online from their children, in which case, the child's account will be deleted. Parents may contact us at website@bkcreditunion.ie for your child's protection; we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

D. How May Parents Raise Other Questions or Concerns?

If a parent has any questions or concerns about his or her child's use of the Sites, we encourage the parent to contact us at website@bkcreditunion.ie

9.2 Changes to our Privacy Statement

Any changes we may make to our privacy statement in the future will be posted on this page.

10. How to contact us

Questions, comments and requests regarding this privacy statement are welcomed and should be addressed in writing to The Data Protection Officer to dataprotection@bkcreditunion.ie

10.1 Credit Union

This is the website of Ballyshannon and Killybegs Credit Union, Main Street, Killybegs, Co Donegal

Phone: - 074 955 4455

Email: - website@bkcreditunion.ie