

# WEBSITE PRIVACY POLICY

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## Website Privacy Policy

### 1. Who We are:

We are Black Raven Credit Union Limited. We are committed to protecting and respecting your privacy.

This statement sets out the basis on which any of your personal data is processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.

We are a data controller for the purpose of the Irish Data Protection Acts 1988 and 2003 ("Acts").

### 2. Collection and Use of Information:

Any information which is provided by you will be treated with the highest standards of security and confidentiality and in accordance with the terms of the Data Protection Acts 1988 and 2003, Directive 95/46/EC of the

European Parliament and of the Council of 24th October 1995 on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Movement of Such Data, and any implementing and/or amending legislation as may be adopted in Ireland from time to time. If at any time after giving us personal information you decide that you no longer wish us to hold or use this information, or in the case that the information becomes out of date, you are free to notify us, and we will remove or rectify the information within a reasonable time and in accordance with legislative requirements. You acknowledge and agree that in certain circumstances we may be obliged to disclose personal information relating to you to third parties, for example, in order to conform to any requirements of law or to comply with any legal process, as well as to protect and defend the rights of property of the Credit Union, our licensors and/or our other customers.

We may collect and process the following information about you:

- Information provided at the time of registering to use our online credit union services.

- Information that you or others provide by filling in forms on our website or which you or they otherwise provide to us.
- Any instructions we accept from you or transactions we undertake to which you are a party, whether through our website, branches or otherwise.
- If you contact us, we may keep a record of that correspondence.
- Telephone calls may be recorded. This is to verify your information, for our staff training, regulatory and for service quality purposes.
- Information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### **3. Use of cookies:**

We may obtain information about your general Internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and to deliver a better and more personalised service. Some of the cookies we use are essential for the Website to operate.

You block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit the website.

### **4. What we do with your information:**

We use information held about you in the following ways:

- to provide credit union and other related services, products and facilities to you;
- to assess eligibility and credibility for the services, products and facilities we offer;
- to implement any contracts we have entered into with you; and
- to conduct credit searches with credit reference agencies in order to provide credit facilities and, where necessary, for fraud prevention and debt recovery.

We may also use information about you to notify you about changes to our services to which you have subscribed or to provide you with information about products or services that you request from us or, where you have agreed to us doing so, which we feel may interest you.

We may use anonymised or statistical information to analyse our website and services and to make improvements or other adjustments to them.

#### **5. Where we store your personal information:**

It is possible that some of the information about you that we hold may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us, one of our suppliers or someone else. For instance, if it is necessary to do so to complete a transaction, your personal information (e.g. name and account details) may be sent to a third party or one of our contracted suppliers outside the EEA.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy statement.

#### **6. Security for CU Online:**

All information you provide to us through CU Online is stored on secure servers.

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.

#### **7. Your Rights:**

You have rights under the Irish Data Protection Acts 1988 and 2003.

You have the right to ask us not to process your personal data for marketing purposes. 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 [enquiries@blackravencu.ie](mailto:enquiries@blackravencu.ie)

You also have the right to access information held about you. Your right of access can be exercised in accordance with the Acts. Any access request may be subject to a statutory fee to meet our costs in providing you with details of the information we hold about you.

#### **8. Disclaimer:**

The Credit Union, its directors, employees, affiliates or other representatives, shall not be liable in respect of any claims, emergencies, demands, causes of action, damages, losses, expenses, including without limitation, reasonable legal fees and costs of proceedings arising out of or in connection with the use and/or dissemination of personal information relating to you in accordance with this privacy policy and your consents. You should be aware that where you link to another website from the

Credit Union website that we have no control over that other website. The Credit Union has no responsibility for the privacy practices of other websites.

#### **9. Changes to our Privacy Statement:**

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

#### **10. Contact Us:**

Questions, comments and requests regarding this privacy statement are welcomed and should be addressed to [enquiries@blackravencu.ie](mailto:enquiries@blackravencu.ie)