

Privacy Notice

Black Raven Credit Union is a data controller

Black Raven Credit Union Limited BRCU is a member-owned financial organisation that provides financial services to its members. We are committed to protecting the privacy of personal data under our control and this statement summarises our approach. While providing personal data to us in the course of business with BRCU or using our website, we will manage your data in accordance with European and national law.

This is a summary document to provide a clear indication of our processing activities and to inform you of your rights. We recommend that you use a full version of this document when considering your rights. A full version can be obtained in branch or by request. For more information please contact our Data Protection Representative at enquiries@blackravencu.ie or call on 01 4610682.

1. THE PERSONAL DATA THAT WE PROCESS AND WHY

Membership



Purpose; We obtain personal data from you to manage your relationship with BRCU, administer your savings, provide current account, debit card or investment services and to fulfil our legal obligations. This personal data may include identification, taxation, beneficial ownership, bank details, nominee details and security data, and for the purpose of AML legislation further details about your identity and source of income.

Legal basis for processing; we may rely upon our agreement(s) with you, the legitimate interest of BRCU to provide financial services in accordance with the Credit Union Acts and Central Bank guidelines and to administer the organisation in an efficient manner, our obligations under law, the vital interest of the member or consent as a basis for processing your membership data.

Loans



Purpose; We obtain personal data from you to assess, approve or manage a loan to you or to which you are a party, for the recovery or transfer of debt, the administration of related insurance and to fulfil our legal obligations. This personal data may include related party information, identification, taxation, proof of income and outgoings, credit records or bank details relating to you or to third parties such as spouse, dependants or guarantors.

Legal basis for processing; we may rely upon our loan and membership agreements with you, the legitimate interest of BRCU to provide credit services and to recover debt in an efficient manner, our obligations under law, or consent as a basis for processing your personal data in relation to a loan.

Direct Marketing



Purpose; We obtain personal data from you to promote BRCU services and activities, this may include your name and contact details. Examples of activities include competitions, quizzes and surveys.

Legal basis for processing; we may rely upon the legitimate interest of BRCU to promote services or consent as a basis for processing your personal data. Note; you can decide to opt-out of direct marketing communication at any time.

CCTV and voice recording



Purpose; CCTV and Voice recordings are for the purpose of safety, security, transaction, or the recording of communications.

Legal basis for processing; we may rely upon consent or the legitimate interest of BRCU to protect its interests as a basis for processing such recordings.

2. TRANSFERRING YOUR DATA TO A THIRD PARTY

There are many activities of the credit union that require your data to be transferred to a third party. They may include the following categories of recipients; Revenue, a state regulator or individuals appointed to maintain regulatory compliance, auditors, advisors, Life & pensions companies, the Irish League of Credit Unions ILCU, Credit Union Development Association (CUDA), Payac, CUSOP, ECCU, Central Credit Register, banking or Insurance providers, professional advisors, third parties for the purpose of the collection or transfer of debt, the board of the Credit Union, IT and support providers, and electronic payment organisations.

In any event, personal data shall only be transferred for specific purposes that are in the legitimate interest of the Credit Union, are subject to a contract with you, are in your vital interest or are required by law. We may also transfer personal data with your consent.

3. WHERE YOU HAVE PROVIDED CONSENT

Where we are processing data based on your consent you may withdraw that consent at any time.

4. INTERNATIONAL TRANSFER

The Credit Union does not currently transfer personal data to any recipients outside of the EEA European Economic Area unless such transfer is of a member's data to the member and upon that member's request, or in the course of debt recovery. Where you seek advice or purchase a life & pensions product, the company providing that product may transfer your data to a location outside of the EEA. Where we engage suppliers that are international in nature we ensure that conditions are put in place to provide protections for your data that are consistent with the GDPR.

5. INFORMATION RELATING TO CHILDREN AND VULNERABLE PERSONS

The processing of personal data relating to minors receives special attention under Data Protection Regulation and we shall treat this information with particular care. Children are defined as under 16's in Ireland. Information obtained about children shall comply with the requirement for parental consent and shall receive additional consideration while planning an operational process.

6. SPECIAL (SENSITIVE) DATA

The Credit Union recognises special categories of data, specifically personal data revealing racial or ethnic origin, political opinion, religious or philosophical beliefs, trade union membership, genetic or biometric data, or a subject's health or sexual life. The processing of these categories of information shall typically require consent. Health details may be required for the purpose of insurance or the approval of a loan.

7. YOUR RIGHTS

In addition to the right to know the information on this data protection statement, subjects also have the right to:

1. Information on whether we have Personal Data relating to a subject, the categories of data and the purpose of processing.
2. Access your personal data. Where the format is not reasonably understood, this shall be delivered in an intelligible format.
3. Have inaccurate, incomplete or out-of-date personal data that we hold about you corrected or deleted.
4. Withdraw consent for your personal data to be processed - where it was obtained from you on the basis of consent.
5. Be informed if a failure to provide the personal data will have any direct and material personal consequences.
6. Make a submission on any automated decisions making processes or profiling of you.
7. Transfer your data to another controller.
8. Have your personal data excluded from certain categories of processing.
9. Lodge a complaint with the Data Protection Commissioner DPC. Contact details for the DPC can be found at www.dataprotection.ie.

Please note;

- There are some limitations to these rights.
- Nomination information is considered confidential data.
- You can contact us to exercise these rights in branch or by e-mail at enquiries@blackravencu.ie or call on 01 4610682
- The Credit Union will require proof of your identity prior to discussing or providing access to your personal data.

8. DATA RETENTION

We retain personal data that you submit to us only for as long as is necessary for the purposes for which it was obtained, or as required by law. The Credit Union reserves the right to delete personal data prior to the conclusion of the retention period.

Storage of personal data		
Purpose of processing	Duration	Criteria for the storage of personal data
Membership information	7 years	From closing of the account, or greater where regulation mandates.
Loan related data (transaction details)	7 years	From closing of the loan
Loan protection insurance	1 year	From closure of a loan account
Direct marketing data	1 year	From the last communication
CCTV	1 month	From recording. Up to 6 years in the event of an incident where a material risk of a liability exists
Incidents or complaint reports	Permanent	
Small balance write-offs / Un-cashed Cheque details	Permanent	Mandatory requirement
Documentation relating to revenue		Stored as mandated by law plus 12 months
AML and Fraud prevention documentation		Stored as mandated by law plus 12 months
Records and explanation of transactions, and of the provision of service		As mandated by the CU Handbook published by the Central Bank.
Nothing in this section creates an obligation upon the Credit Union to retain personal data on behalf of a subject.		

9. WEBSITE USAGE

While using our website we use cookies – small text files – which are placed on your hard drives to provide a more intuitive website experience. Cookies are a typical part of operating procedure for most websites and most browsers permit users to opt-out of receiving them if the user would prefer. You can opt out of the use of certain categories of cookies on the cookie notice tool that is always visible while you use the BRCU website. This may reduce some of the functionality of the site. Cookies can be deleted from your browser at any time.