



# Privacy Notice

## Guarantors

Please note this information need only be given to a data subject once

The data controller is Ennistymon & District Credit Union Ltd,  
 Church Street, Ennistymon, Co. Clare, V95 W085  
 Tel: (065) 707 1126  
 Email: [info@ennistymoncu.ie](mailto:info@ennistymoncu.ie)

Our Data Protection Officer can be contacted by e-mailing [dpo@ennistymoncu.ie](mailto:dpo@ennistymoncu.ie), or by post at the address above.

The **purpose of the processing** is in support of an application for credit from a member for whom you have agreed to be a guarantor, and an assessment of this application by the credit union. A successful application will result in a credit agreement being issued.

The **legal basis for processing** is for the performance of a contract to which the guarantor is party or in order to take steps at the request of the guarantor prior to entering into a contract.

**Who we share your data with** – sharing of your data can occur with the following:

- The person whose loan you are guaranteeing
- credit reference / rating agencies
- our loan protection insurance provider
- statutory and regulatory bodies, and law enforcement authorities
- systems suppliers providing systems support, off-site data backups, testing backup data, etc.
- supplier used for checking the names of members against sanctions lists,
- debt collectors & solicitors used for recovery of outstanding debts

We receive **personal data belonging to you from third parties**, in the form of credit reports from credit reference / rating agencies. The lawful basis for this processing is legal requirement. These reports are not retained beyond the loan assessment process. The categories of data provided to us may include:

<b>PERSONAL INFORMATION includes</b>	<b>CREDIT INFORMATION includes</b>
Name (forename & surname) Current and previous addresses Date of birth Personal public service number (PPSN) Gender Eircode Telephone number	Type of loan (credit card, mortgage, overdraft) Name of the lender Amount of the loan Outstanding balance Number of overdue payments (if any) Date of next payment Amount of next payment

There are no **transfers of your personal data outside of the EEA**

**Retention of your data** – In a successful application for credit, in compliance with legal requirements for record keeping, loan applications, loan assessment forms and credit agreements are held for 7 years after they have been topped-up or completed. Supporting materials for assessment of ability to repay and guarantor materials are destroyed once the loan is topped-up or completed.

In the case of an unsuccessful, cancelled or withdrawn application, all personal data will be deleted after a period of 3 months.

**Your rights as a data subject** – you have the right to:

- **Data access** – find out how we use your information, what information of yours we have, and receive copies of this information
- **Rectification or erasure of data** – have inaccurate/incomplete information corrected and updated, and, in certain circumstances, to have your information deleted
- **Restriction of processing** – in certain circumstances, to have our use of your data restricted
- **Objection to processing** – in certain circumstances, to object to particular use of your personal data for our legitimate business interests (e.g. for direct marketing purposes). You also have the right not to be subject to solely automated decisions, and the right to have a person review such decisions.
- **Data portability** – exercise the right to data portability (i.e. to obtain a transferable copy of information we hold about you, to give to another provider)

**Processing based on consent** – if our lawful basis for processing your data is your consent to do so, you have the right to withdraw consent at any time. You may do this by dropping into one of our offices, or by writing to, or emailing us.

**Provision of personal data for a loan application** – provision of your personal data for this loan application is a requirement necessary to enter as guarantor into this contract. Failure to provide the required information means we cannot process this loan application with you as guarantor.

**Automated decision making** - we use a credit scoring system which helps us assess ability to repay by comparing overall income with any financial commitments. Our decision to lend may be based solely on this system. The financial standing of the guarantor is an element in this process.

The applicant has the right to obtain human intervention in this automated process, to express their point of view, to obtain an explanation of the decision reached after such assessment, and to challenge the decision.

We may use automated processing to assist in compliance with our legal obligations around the prevention of money laundering, fraud and terrorist financing; for example to screen for suspicious transactions.

**Profiling** – we do not carry out any profiling on persons acting as guarantors for loan applications.

If you are a member, we do use anonymised information from our member database to create member profiles, grouping individuals with similar characteristics together, to produce statistical information on our membership and on our service provision. This is done to assess service uptake, and for marketing purposes to identify services other members might find useful. You have the right to object to this processing.

**Notification of additional processing** – please note that, if, at some future time, we wish to use the data you are providing for a purpose other than that outlined here, we are obliged to let you know beforehand. Please note that, where this is required or permitted by law, we may process your personal data without your knowledge or consent.

**Updates** - This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be available from our website, the DPO, or the Manager.

**Lodging a complaint** – you have the right to lodge a complaint about your personal data being processed, either with our Data Protection Officer (as above), or directly with the Data Protection Commission, whose contact details are as follows:

Telephone +353 (0)1 765 0100 / 1800 437 737	Address: Data Protection Commission
E-mail <a href="mailto:info@dataprotection.ie">info@dataprotection.ie</a>	21 Fitzwilliam Square South
Web: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a>	Dublin 2 D02 RD28

You can find more detailed information on what personal data we process and how we process it in our main Privacy Notice on our website [www.ennistymoncu.ie](http://www.ennistymoncu.ie)