# **Privacy Notice**

**Newarthill Credit Union** ("we", "us", "our" or "the credit union") understands the business impact of personal data related risks and are committed to protecting and respecting your privacy.

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

The Policy sets out the lawful basis and specified purposes on 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.

#### For website communication

By visiting our Site you are accepting and consenting to the practices described in the Privacy Notice and full Policy for Data Security.

Newarthill Credit Union is registered in Scotland and has its registered office at 111-113 High Street, Newarthill, Motherwell, ML1 5JH

Newarthill Credit Union is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Financial Services Register No. 213880.

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 <u>Privacy Policy</u> so that you may feel confident about the privacy and security of your personal information.

## **Newarthill Credit Union Privacy Notice**

We are committed to protecting our members' privacy. The credit union requires information for membership to meet legal obligations or to enable us to operate a member service (legitimate interest) with you.

#### How we use your personal information

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

### For legal reasons

- 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

• consider any applications made by you;

#### For our legitimate interests

- deal with your account(s) or run any other services we provide to 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.
- recover any debts owed to us

#### With your consent

 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:

- 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 reorganisation 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. 2

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 than information to tax authorities in countries where you or a connected person may be tax resident.

### **Retaining your information**

The 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.

#### **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.

## 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

## Contact us about your rights

For more information about how your rights apply to your membership of the credit union or to make a request under your rights you can contact us via email <a href="mailto:newarthill@cumas.co.uk">newarthill@cumas.co.uk</a> or telephone 01698 862770. 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:

Newarthill Credit Union 111-113 High Street, Newarthill Motherwell ML1 5JH

### **Changes to this Privacy Notice**

We can update this Privacy Notice at any time and ideally you should check it regularly at www.newarthillcu.co.uk or obtain a leaflet from the main office.