

DATA PROTECTION STATEMENT – GENERAL BUSINESS ACTIVITIES

1. OVERVIEW

We want to explain clearly how we process your Personal Data when you interact with Life Credit Union as a supplier, a website user, a candidate for a voluntary role or employment or as a visitor.

We collect and process personal data as we carry out the day-to-day business activities of running the Credit Union including dealing with suppliers, operating our website, securing our premises and carrying out recruitment related activities. This section of the data protection statement provides specific information relating to the processing of personal data in our general business activities.

2. WHO THIS DATA PROTECTION STATEMENT APPLIES TO

This Data Protection Statement provides specific information relating to the following data subjects whose Personal Data we process:

- business contact details including those of our customers, suppliers, partners, shareholders and business prospects “**Business Contacts**”;
- users/visitors to our Website “**Website Users**”; and
- prospective employees /those applying for jobs at Life Credit Union “**Candidates**”; and
- members of the public who pass by and/or visit Life Credit Union offices and whose images are captured on CCTV “**Visitors**”;

3. CATEGORIES OF PERSONAL DATA

We process the following categories of Personal Data. For each category we have included an example of the type of Personal Data that maybe part of that category:

Personal Data Category	Description
Identification Data	may include a person’s name, date of birth, driver’s license and passport information.
Contact Data	may include a person’s email address, phone number, postal address, other communication details (e.g. Skype)
Communication Data	may include phone calls, email correspondence and hard copy correspondence. This includes recording of phone calls when you phone the Credit Union.
Marketing Data	may include your Contact Data and any preferences in receiving marketing from us and your communication preferences.
Recruitment Data	may include recruitment related data such as Identification Data, Contact Data, Communication Data, CV and job application data.

	This may include employment history, skills/ experience, languages, educational history, qualifications, membership of professional associations, contact details of employer references/character references, licenses held, interests and hobbies, languages, locations, nationality, passport, eligibility to work in certain jurisdictions, salary expectations, interview/screening answers and notes.
Financial Data	may include payment related information or bank account details and financial data received as part of the services that we provide.
Special Category Recruitment Data	If we interact with you for the purposes of a job with the Company, we may collect Recruitment Data that is of a special category per the GDPR definition: this can include diversity data such as gender, religion, racial or ethnic origin, sexual orientation, trade union membership or data relating to health. We will only source this data with the explicit consent of Candidates.
CCTV Data	We operate CCTV cameras at some of our premises. If you pass by and/or visit some of Life Credit Union' premises, your image may be recorded on CCTV
Web Data	may include Personal Data provided on any forms on our website and, to the extent that it includes Personal Data, information on the type of device you're using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.
Social media data	We receive Personal Data about Website Users when they follow social media links on our website.

4. OUR PROCESSING ACTIVITIES

We use Personal Data to assist us in the operation of the company. Under data protection law, we must ensure that the purpose of processing is clear.

Purpose of Processing	Categories of Personal Data	Lawful Basis
Managing payments and administration of the contract including: <ul style="list-style-type: none"> To carry out due diligence on suppliers prior to entering into a contract to process payments to and from our business to fulfil our legal/contractual obligations to manage/respond to complaints/issues 	<ul style="list-style-type: none"> Contact Data Communication Data Financial Data 	<ul style="list-style-type: none"> Contract Legitimate Interest Legal Requirement
Recruiting staff including: <ul style="list-style-type: none"> to interview the Candidate to manage our database of Candidates to contact you in connection with any job position we may have open to check your suitability for the role to fulfil the recruitment needs of the business. 	<ul style="list-style-type: none"> Identification Data Contact Data Communications Data Recruitment Data Web Data Special Category Recruitment Data 	<ul style="list-style-type: none"> Legitimate Interests Consent Contract
Website delivery including: <ul style="list-style-type: none"> to manage and respond to web forms to promote our products and services to administer the Website 	<ul style="list-style-type: none"> Web Data Contact Data 	<ul style="list-style-type: none"> Legitimate Interests Consent

Purpose of Processing	Categories of Personal Data	Lawful Basis
<ul style="list-style-type: none"> To manage your website experience To improve our website content for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes to ensure the safety and security of our website and our services. 		
Ensuring security of the Life Credit Union premises	<ul style="list-style-type: none"> CCTV Data 	<ul style="list-style-type: none"> Legitimate Interests
Social Media Account Management including: <ul style="list-style-type: none"> To market our services to you through social media interactions To respond to enquiries about our services 	<ul style="list-style-type: none"> Contact Data Correspondence data Social media data 	<ul style="list-style-type: none"> Consent Legitimate Interest
Management of Corporate Affairs <ul style="list-style-type: none"> to take minutes at board meetings to contact shareholders/investors to enter into partnerships and other commercial relations to undertake appropriate due diligence 	<ul style="list-style-type: none"> Identification Data Contact Data Communication Data Financial Data 	<ul style="list-style-type: none"> Contract Legitimate Interest Legal Obligation

5. SOURCES OF PERSONAL DATA

BUSINESS CONTACT PERSONAL DATA

We collect Business Contact Personal Data from our business contacts including –suppliers, partners, consultants, shareholders and business prospects.

We source Business Contact Personal Data in order to serve the business relationship. We will only ever source Personal Data that is necessary and in a way that would be generally expected.

We receive Personal Data about Business Contacts from a variety of sources, as follows:

- the Personal Data is often provided by the Business Contact as part of the business relationship;
- the Personal Data may be collected from public sources;
- the Personal Data may be collected indirectly from another person within the company of the Business Contact;
- the Personal Data may be collected through our website;
- the Personal Data may be collected indirectly from a website or from a third party.

CANDIDATE PERSONAL DATA

We will only ever source Personal Data in a way that would be generally expected.

We receive Personal Data relating to Candidates from a variety of sources. The primary source is from Candidates directly.

Examples of the sources of Personal Data of Candidates are as follows:

- the Candidate may send their CV to us with the intention of registering with us to be informed of potential job vacancies;
- the Candidate may apply directly to a position advertised on our website;
- the Candidates details may be provided by a member of staff or third party by way of referral; and
- the Candidates details may be provided by a recruitment agency.

WEBSITE USERS PERSONAL DATA

We receive information from you when you visit our website, when you complete an online form on our website, if you subscribe to our newsletter or if you follow us via social media links on our website.

This information is collected from you as a result of your interaction with the www.lifecu.ie website.

We also collect information with your consent when we place cookies on your web browser. For more details please refer to our Cookie Statement.

SOCIAL MEDIA USERS PERSONAL DATA

We collect information from you when follow our social media accounts, like, comment or reshare a social media post or when you communicate with us via messaging apps on social media platforms.

CCTV PERSONAL DATA

We may collect CCTV video footage of visitors to our premises.

CALL RECORDING PERSONAL DATA

We record all incoming calls to the Credit Union.

6. RETENTION

In some circumstances it is not possible for us to specify in advance the period for which we will retain your Personal Data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate business interests. We may also retain certain Personal Data beyond the periods specified herein in some circumstances such as where required for the purposes of legal claims.

Our retention policy is as follows:

Purpose of processing	Categories of Personal Data	Retention Period
Relationship Management	<ul style="list-style-type: none">Contact DataCommunications DataIdentification DataFinancial Data	24 months after completion of service delivery activities in the case where there is no further meaningful engagement. Certain Personal Data may be retained for 7 years
Marketing & Sales	<ul style="list-style-type: none">Contact DataCommunication DataMarketing DataWeb Data	12 months in the case where no meaningful engagement or earlier in the case you unsubscribe.
Recruitment	<ul style="list-style-type: none">Identification DataContact DataCommunications DataRecruitment DataWeb DataSpecial Category Recruitment Data	18 months for unsuccessful candidates
Website Delivery	<ul style="list-style-type: none">Web DataContact Data	12 months or less
Security	<ul style="list-style-type: none">CCTV Data	30 days
Complaint Handling	<ul style="list-style-type: none">Call recording data	30 days except where a complaint is under investigation or for purposes of Mortgage Arrears where we are required to retain calls for a number of years.

Purpose of processing	Categories of Personal Data	Retention Period
Management of Corporate Affairs	<ul style="list-style-type: none"> • Identification Data • Contact Data • Communication Data • Financial Data 	7 years unless required to retain indefinitely

In certain cases, we may retain Personal Data for longer than specified here if required under relevant laws.

Note that this section of the Credit Union Data Protection Statement relates only to how we process data relating to the Credit Union website.

Separate Data Protection Statements provide further information about how we process your Personal Data when you interact with any of the Credit Union Services such as member accounts; loans; online banking; current accounts and other general services offered by the Credit Union. Our general Data Protection Statement provides further information including about any marketing undertaken by the Credit Union. For further information relating to (i) how to exercise your rights, (ii) who your Personal Data may be shared with (including cross border transfer); (iii) the security measures we have implemented and the contact details for the Data Protection Commission in Ireland you should read the full Credit Union Data Protection Statement at <https://lifecu.ie/wp-content/uploads/Detailed-Data-Protection-Statement.pdf>

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