

DATA PROTECTION STATEMENT – ONLINE LOAN APPLICATIONS

1. Overview

We want to explain clearly how we process your Personal Data when you apply for and receive a loan from Life Credit Union using our online loan application facility.

In order to provide Credit Union loans, we need to collect Personal Data from our members. This section of the Data Protection Statement provides specific information relating to the processing of online loan applications and subsequent maintenance of loan accounts.

2. Members and Their Representatives

Our Members are individuals to whom we provide Credit Union loans.

For the most part we transact directly with members in relation to the operation of the Credit Union loans. On occasion we may transact with relatives, guarantors or representatives who are acting on behalf of a member.

When we transact with someone on behalf of a member, we will also collect limited additional Personal Data about that person, this might include:

- a person who acts as guarantor on a member's loan;
- a spouse or relative who provides information to us to support the loan application;
- a legal representative of a member who communicates with us on the member's behalf.

3. Categories of Personal Data

This Data Protection Statement provides information relating to the categories of Personal Data we process.

When you apply for a Credit Union loan using our online loan facility, we collect the following information.

Category of Personal Data:	Description:
Contact Data	This includes email address, phone number, postal address, billing address.
Financial Data	This includes financial data such as your account status and history. With loans we may also request broader information around your financial income and outgoings such as salary, occupation, accommodation status, mortgage details, other loans and debts, previous addresses, spouse, partners and we may request further information to support the purpose for the loan.
Correspondence Data	If you interact with us, we will record details of those interactions. For example, we will process details of phone calls, email correspondence and hard copy correspondence.
Web Data	When you apply online we collect details such as username and password in (order to create an account), information about your interactions with the

When you apply for a Credit Union loan using our online loan facility, we collect the following information.

Category of Personal Data:	Description:
	online loan facility such as your IP Address, time and date of interactions and the progress of your application.
Log data	This includes data about your use of our online banking services, including data about the time and date of your interaction as well as IP address and transaction information.
PPSN	Your Personal Public Services Number (PPSN) will be collected, in order to meet our reporting requirements to the CCR.
Health Data	You complete a health declaration form for the purpose of loan insurance. The level of information required will depend on factors such as your age, your health situation and the amount of the loan.

4. Processing Activities

We have set out below the general purpose of processing, the categories of Personal Data processed and the related lawful basis for processing.

We have to process Personal Data legally. As a regulated entity much of the data that we process is required to meet with a regulatory obligation or in order to deliver Credit Union loan services to you.

Purpose of Processing:	Categories of Personal Data:	Lawful Basis:
To process your application for a loan;	Contact Data Financial Data	Contract
To assess your application for a loan;	Contact Data Financial Data PPSN	Legal Obligation Legitimate Interests
To provide loan drawdown and to manage the repayment schedule; To provide you with information about the performance of your loan;	Contact Data Financial Data Correspondence Data	Contract
To administer the ILCU Loan Protection Scheme;	Contact Data Financial Data Health Data	Contract Explicit Consent
To implement credit control measures where there are missed loan repayments; To carry out credit control including collecting and enforcing debts and arrears;	Contact Data Financial Data	Contract
To comply with our legal reporting obligations in respect of the Central Credit Register (CCR);	Contact Data Financial Data PPSN	Legal Obligation
To interact with the regulator and the Central Bank of Ireland for reporting, compliance and auditing purposes;	Contact Data Financial Data	Legal Obligation

to engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating;		
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5. Sources of Personal Data

We receive information from you when you apply for a loan online.

This information is collected from you directly through the online loan application facility or from you and other people in the case of a joint loan application or where proof of household income is sought.

We receive information from external sources such as the ICB and CCR when we carry out Credit Checks relating to the Loan application.

We receive information from you during the course of the loan such as:

- information related to loan repayments;
- information you supply when you communicate with us about your loan repayments.

We may receive information about you from a representative when they communicate with us on your behalf.

6. Retention of Loan Information

Our retention policy is as follows:	
Purpose	Retention Period
Loan application and approval, loan administration	Termination of loan + 7 years

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

As part of the online loan application process you may also be joining the Life Credit Union as a member. You will be provided with information about how we process Member Information during the member application process.

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; website; online banking; 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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