

DATA PROTECTION STATEMENT – CURRENT ACCOUNTS

1. Overview of Current Accounts

We want to explain clearly how we process your Personal Data when you apply for and use our current account facilities as a Credit Union Member.

In order to provide our online banking services, we need to collect Personal Data in order to set-up and manage your current account. This section of the Data Protection Statement provides specific information relating to your current account.

Note: You must be an existing Credit Union member to apply for current account. To see how we process your data in relation to your Credit Union Membership please see the section in this Data Protection Statement - Overview of Member Account Data.

2. Categories of Personal Data

We process personal data as a result of your interaction with our current account services.

When you register for and use our current account facilities, we process the following categories of personal data.

Category of Personal Data	Description
Identification Data	This includes name, marital status, title, data of birth, address, gender. It includes verification data required to identify you as the holder of the account.
Contact Data	This includes name, home address, work address, email address, phone number, online communication id (e.g., skype), social media profile.
Registration data	This includes identification data (member account details and PPS number), contact data (proof of address), Financial Data
Transaction Data	This includes data about your use of the current account services, including data about the date, time and details of your transactions
Financial Data	This includes financial data such as your account status and transaction data.
Correspondence Data	This includes details of correspondence relating to your use of the current account services including support requests
Log Data	This includes internet usage data, cookies data, IP address
Marketing Data	This may include your Contact Data and any preferences in receiving marketing from us and your communication preferences.

3. 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. We collect data when you interact with our current account services in order to provide a secure service and to administer the service		
Purpose of Processing	Categories of Personal Data	Lawful Basis
To register you for current account services	<ul style="list-style-type: none"> Registration data Financial Data Correspondence Data Identification Data Log Data 	Contract
To administer the current account services	<ul style="list-style-type: none"> Identification Data Transaction Data Financial Data Correspondence Data 	Contract Legitimate interest
To support your current account and answer queries	<ul style="list-style-type: none"> Identification Data Correspondence data Transaction Data Financial Data 	Contract Legitimate Interest
To administer the provision of debit cards to current account holders	<ul style="list-style-type: none"> Identification Data Financial Data 	Contract Consent
Administration of our relationship including: <ul style="list-style-type: none"> to manage/respond to a complaint/appeal. to keep you informed about the operation of the Credit Union to notify you of updates to this Data Protection Statement. 	<ul style="list-style-type: none"> Contact Data Correspondence Data Identification Data 	Legitimate Interest Legal Obligation
Legal Undertakings and Audit including: <ul style="list-style-type: none"> To comply with Central Bank reporting, compliance and auditing regulatory activities To comply with revenue reporting obligations To comply with <i>anti-money laundering (AML)</i> and the countering of the financing of <i>terrorism (CFT)</i> regulations. To ensure the prevention, investigation and detection of Payment Fraud under the (Payment services) Regulations 2018. to comply with legal obligations connected with “know your customer” requirements under anti-money laundering laws, or under anti-money counter terrorist financing law and (Payment services) Regulations 2018. to engage with internal and external auditors who advise on how we can best meet our obligations and improve our ways of operating. 	<ul style="list-style-type: none"> Identification Data Correspondence Data Financial Data Contact Data 	Legal Obligation

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Purpose of Processing	Categories of Personal Data	Lawful Basis
<p>Marketing & Service Management</p> <ul style="list-style-type: none"> To offer you additional services associated with current account membership such as online banking, foreign exchange services and loan facilities. To keep you informed of new Credit Union services that may be of interest to you. To run internal reports for service management and improvement 	<ul style="list-style-type: none"> Contact Data Marketing data 	<p>Legitimate Interest Consent</p>
<p>Loan/overdraft application and approval, loan/overdraft administration and debt collection</p> <p>Please see our Loan Data Protection Statement for further information https://lifecu.ie/wp-content/uploads/Data-Protection-Statement-Loan-Accounts.pdf</p>	<ul style="list-style-type: none"> Financial Data 	<p>Legitimate Interest Contract</p>

4. Sources of Personal Data

We receive information from you when you register for current account services and whenever you interact with those services.

This information is collected from you directly as a result of your use of the Current Account service.

5. Retention

We will only retain Personal Data for as long as it is needed for the purpose for which it was collected. After that it is deleted from our systems.

Generally, Personal Data collected specifically for delivery of current account services is kept until account closure plus a period of 7 years.

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

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/Full-Data-Protection-Statement.pdf>

6. Debit Card Services

Please note when you choose to apply for a debit card on your current account this is administered by Transact Payments Malta Limited, an Independent Controller of your personal data. If we issue you a debit card, Transact Payments Malta Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data, you should review their privacy policy which is available at <http://currentaccount.ie/files/tpl-privacy-policy.pdf>

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