

Privacy Statement

Your right to privacy is important to us. We take the security of your information seriously and have strict policies and processes in place to ensure it remains safe. This Privacy Policy describes the way we collect your information, how we use it and why.

Citysave Credit Union Ltd, will manage your data in line with the requirements of the Data Protection Act 1998 and the provisions of 2018 General Data Protection Regulation (GDPR)

Citysave Credit Union Limited will act as the 'data controller' for your personal data if you apply for or hold an account or service with us. Under the Data Protection Act, and GDPR provisions, the 'data controller' is responsible for ensuring that your information is lawfully and properly processed.

The information we hold about you

To enable us to provide you with accounts and services, we require certain details about you. We will ask you to provide most of this information yourself, however, we may also seek further data using external sources, such as credit reference agencies.

There may be occasions where you provide us with information about another person, for example, if you are applying for an account on behalf of a child. In this case, we will assume that you have permission to provide this information and that the other person understands how we will use their information and has no objection.

We will not be able to provide you with an account or service if you do not supply us with the necessary information to do so, or if you do not give us your permission to process your information.

The type of personal information you might expect us to hold about you includes:

Your personal details, for example, your name, date of birth, address, telephone number, email address, National Insurance number and, in some instances, sensitive data such your financial circumstances.

Information about the accounts you hold with us (or have previously held with us) and the transactions on those accounts.

Records of our contact with you, for example:

Notes on our systems, emails or other electronic communications and written correspondence. We may record and monitor telephone calls for training purposes and to check and improve the quality of our service.

Depending on the accounts or services you apply for, or hold with us, we may also record additional personal information such as your income, employment details, financial commitments, or details of a credit search.

How we use your information

We use your information to assess every application you make for an account or service, to manage your accounts, develop our services and ensure that we comply with the legislation that governs our activities. We will use your information specifically to:

- Confirm your identity when you apply for an account or service
- Assess your application for an account or service. Depending on the type of account you apply for, this may include assessing lending and fraud risks and credit scoring, for example, if you apply for credit.
- Set up and provide the accounts you have requested and keep our records up to date
- Meet our legal and regulatory obligations and for crime prevention/detection
- Test computer systems to ensure the continuing security and integrity of our systems
- Carry out customer surveys and statistical analysis to enable us to improve our products and services

Who we share your information with

We will only share your information with other organisations for the reasons detailed below, and will not provide your details to third party organisations for marketing purposes.

Confirming your identity

All financial institutions are required by law, under Money Laundering legislation, to confirm a customer's identity. We may, therefore, supply your information to a specialist external agency to help us confirm your identity. We may occasionally need you to re-confirm your identity, for example, if you move address or change your name.

Managing your payroll deduction requests

If you ask us to request your Employer to make payments to us from your net pay, we will share certain personal data with your Employer to facilitate the payroll deduction and periodic settlement of amounts to your Citysave account.

Credit checking

If you are applying for an account that requires us to provide you with credit, in order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies (“CRAs”). We may also make periodic searches at CRAs to manage your account with us. To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs. When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders. If you tell us that you have a spouse or financial associate, we may link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at www.equifax.co.uk/crain

The credit reference agency we normally use is:

- Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester LE3 4FS

If you would like to see the information that credit reference agencies hold about you, please contact them directly; they will be able to explain how you may progress your request and any charges that may apply.

Fraud prevention

We may check details of applications you make to us for a loan account or savings account with fraud prevention agencies and HM Revenue & Customs (HMRC). We, and other organisations in the UK or abroad, may access and use the information recorded by fraud prevention agencies to prevent fraud and money laundering.

Fraud reporting

All financial institutions are required by law, under Money Laundering legislation, to report any suspicious transactions to the National Crime Agency, the police and other law enforcement agencies for crime detection and prevention purposes. If we suspect fraudulent activity on any application or account we will notify the appropriate fraud prevention agencies, such as CIFAS, National Hunter, SIRA, as well as law enforcement agencies.

Tax reporting

We are required to provide information about you and your savings accounts to HMRC for tax reporting.

Our suppliers and third parties that provide services to you

Examples of suppliers we use or third parties we appoint to provide services to you are:

- Third party financial services suppliers. For example, Card supplier, so that they can provide you with pre-paid Visa Debit services
- Mailing, data management and information technology suppliers.

Please note that from time to time, we may change the suppliers or third parties we use or appoint to provide services. Where we appoint a supplier to provide a service on our behalf, they must meet our stringent requirements regarding the security and privacy of our customers' data.

Occasionally we, or our suppliers, may transfer data to countries outside of the European Economic Area. These countries may not have the same standard of data protection laws as we do here in the UK. In these circumstances, we will take the necessary steps to ensure that the transfer of your data is in line with the UK data protection requirements, and that your information is treated securely, and protected to a similar standard. Organisations based outside of the EEA may be required to provide your information to foreign authorities.

Other occasions we may be required to share your information with:

- A legal representative acting either for us or you
- Debt counselling advisors, Debt collection agents or other specialist service providers, should you fall into payment difficulties or be unable to repay your outstanding loan balance
- Your Landlord. Typically this will be under an express data share consent to validate information you provide regarding your property tenancy.

We may also share your information with:

- The Financial Ombudsman Service, for example, if you have made a complaint
- Our regulators
- Another organisation, should we ever sell or transfer our business.

How to access or change the information we hold

You have the right to access the personal information we hold about you under the Data Protection Act 1998 and GDPR regulations; this is called a Subject Access Request. Please make your Subject Access Request to us in writing. With effect from 25th May 2018 such requests can be made under the provisions of GDPR and will be free of charge

If you have any questions about the way in which we collect or process your information, please contact us. Similarly, if the information we hold about you is incorrect or out of date, please let us know and we will investigate further to correct any inaccuracies.

You can also find out more about your rights under the Data Protection Act and GDPR by visiting the Information Commissioner's Office website at ICO.org.uk or by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF