



**Eden & South Lakeland
Credit Union**

Fair Processing Notice

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Members

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Version:	2.0
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Author:	Data Protection Officer (DPO), IT Director
Approved by:	Board
Confidentiality level:	Public

Amendment History

Date	Version	Author	Details of Amendment
25/5/18	1.0	DPO	Initial Release
12/7/18	1.1	DPO, IT Director	Revision
19/7/18	1.2	IT Director	Revision
17/08/18	1.3	DPO	Revised to include references to CRAIN and Equifax
19/8/18	1.4	IT Director	Revision
17/9/18	1.5	IT Director	Revision to include reference to sharing data with auditors
11/10/18	1.6	DPO	Updated "Personal Data Usage" table
8/11/18	1.7	IT Director	Revision
19/11/18	2.0	IT Director	Revision

Document Management

This document, which relates to the ESLCU Data Management Policy, is reviewed periodically and at least annually to ensure compliance with the following prescribed criteria:

- General Data Protection Regulation
- Legislative requirements defined by law, where relevant

Purpose

To provide a detailed account for members and prospective members of how their personal data are used by Eden South Lakeland Credit Union (ESLCU).

Scope

All members and prospective members (hereinafter referred to as data subjects) whose data are stored and processed by the credit union.

Responsibilities

The ESLCU Data Protection Officer is responsible for ensuring that this notice is available for placement in front of potential data subjects prior to ESLCU collecting/processing their personal data.

All volunteers and employees of ESLCU who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention, and that the data subject's informed consent to the collection, processing and storage of their data is obtained.

Procedure Statement

Data subjects will be informed as follows.

The personal data we collect from you will be used to:

- Establish your identity and perform regulatory checks which include: Anti-Money Laundering checks, Politically Exposed Person checks, and HM Treasury Sanctions checks
- Establish the type of account that is applicable to you
- Identify you as a member
- Communicate with you as a member
- Comply with International Tax Regulations and to establish UK residency status
- Perform Credit Reference Agency checks (if you are, or apply to be, a lender).

By consenting, you are giving us permission to perform those actions.

You may withdraw consent at any time by making a request to the Data Protection Officer, Eden & South Lakeland Credit Union Ltd, 34 Devonshire Arcade, Penrith CA11 7SX. Withdrawal may mean that we are unable to service your account. In such circumstances we will advise you that we will have to close your account should you withdraw consent.

ESLCU maintains records of volunteers and employees to satisfy the legislation under which it operates and in its own legitimate interests as a credit union. These records will be maintained only for the prescribed period and purposes.

What are Personal Data?

Under the European Union's General Data Protection Regulation (GDPR), personal data are defined as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or

more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Special Categories of Personal Data

Certain data are classified under the Regulation as “special categories”:

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Trade-union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation
- Other

Consent is required for ESLCU to process both types of personal data, and it must be explicitly given. We do not routinely collect personal data that fall in these special categories, but if we seek to do so, we will always tell you why and how the information will be used.

Why does ESLCU need to collect and store personal data?

In order for us to provide you with a service and service your account, we need to collect personal data for correspondence and other administrative purposes. We are committed to ensuring that the information we collect and use is appropriate for these purposes and does not constitute an invasion of your privacy.

We may pass your personal data on to our service providers (currently Burnetts Solicitors, Department of Work & Pensions (DWP), Equifax credit reference agency, and our auditors, Lindley Adams) who are contracted to ESLCU. Our contractors and service providers are obliged to keep your details securely and use them only to fulfil the service they provide you on our behalf. Once your service need has been satisfied or the case has been closed, they will dispose of the details in line with GDPR. If we need to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do so. Equifax is a signatory to the Credit Reference Agency Information Notice (CRAIN). This notice describes how your information is used to provide their service to us (ESLCU) and your rights to fair, accurate and transparent processing under GDPR. The CRAIN document is available at <https://www.equifax.co.uk/crain.html>.

How ESLCU uses your information

ESLCU will process – that means collect, store and use – the information you provide in a manner that is compatible with the EU’s General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time that information has to be kept, but in most cases ESLCU will use its discretion to ensure that we do not keep records outside of our normal business requirements.

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Using your personal data

We will use the information you provide as a member for the following purposes:

Data Collected	Purpose	Membership application	Loan application	Shared with Equifax	Shared with DWP	Shared with Burnetts	Shared with Lindley Adams
Name	To perform regulatory checks and establish your identity	✓	✓	✓	✓	✓	✓
Date of Birth (D.O.B.)	Establish type of account applicable and member identification	✓	✓	✓	✓		
National Insurance Number (NINO)	Member identification & loan administration		✓		✓		
Address	Communications with member and performance of regulatory checks	✓	✓	✓	✓	✓	
Phone Number	Communicate with member	✓	✓				
Email address	Communicate with member	✓	✓				
Signature	Establish identity of potential member	✓	✓				
Copy of photo ID	Establish identity of potential member	✓	✓				
Proof of Identity	Validate identity	✓	✓				
Proof of Address	Validate address	✓	✓				
Membership Number							✓
How heard about us	Analysis to assist with future marketing	✓	✓				
Marital status	To assess ability to repay loan		✓	✓			
Home ownership status	To assess ability to repay loan		✓				
Employment history	To assess ability to repay loan		✓				
Landlord contact details	To assess ability to repay loan		✓				
Financial history	To assess ability to repay loan		✓				

Data Collected	Purpose	Membership application	Loan application	Shared with Equifax	Shared with DWP	Shared with Burnetts	Shared with Lindley Adams
Medical history	To assess ability to repay loan		✓				
Bank details	To assess ability to repay loan and make payments to members when savings are withdrawn	✓	✓				
Bank statements	To assess ability to repay loan		✓				
Pay slips	To assess ability to repay loan		✓				
Repayment history	To assess ability to repay loan			✓			
Credit limit	To assess ability to repay loan			✓			