

Fern Credit Union Privacy Notice

When you join the Credit Union, we ask for information about you for our records. This makes us a Data Controller and as such, we are subject to all of the regulation surrounding Data Protection.

The data you provide will be held securely and will be treated with the highest standard of confidentiality.

It will be used only to provide the services we offer and will not be sold on to third parties for marketing purposes.

About your data

We will collect and maintain up to date records of your personal details and preferences to allow us to provide the financial services as efficiently and conveniently as possible. The data that we request, to hold and process, will usually come under one of the following headings: -

- to comply with our legal obligations as defined under financial regulation
- where necessary to provide specific services
- with your specific consent to at the time we request it

Contract: Upon joining we enter into an agreement. You agree to abide by the terms & conditions and we agree to provide financial services. We need to hold data that will allow us to undertake those services.

Legal obligation: Credit unions must comply with many regulations in order to safeguard you, your data and your funds. These require us to hold and retain your data whilst running your account and some records after closure.

Legitimate interests: As a financial services provider you will expect us to react quickly and efficiently to your requests. To do so we must hold up to date and accurate data records.

Consent: From time to time we like to contact you, maybe to send out newsletters to keep you informed of what is happening within your credit union or to let you know about new products and services. This is entirely optional so for this we require your consent. You can withdraw your consent at any time simply by contacting us and letting us know that you do not wish to be contacted in this way.

Data Sharing

There are times when, in order to provide a service, we will need to share some of your data with external agencies. We will always ensure that the data is used only for the purpose intended, that the data is held securely and that it is destroyed once the task is completed.

Examples of this include but not limited to: -

- **For loan assessment.** As a responsible lender, we take great care in assessing your ability to meet the repayments as we would not wish put you into financial difficulty due to over commitment. To do this we undertake Credit Reference Agency Searches as part of the process, which provides a much fuller illustration of your commitments. We also share data on the performance of your loan with them.
- **For mailings.** We utilise the services of specialised mailing firms to distribute correspondence where large volumes are involved.

Telephone Calls We record telephone calls to assist with training, improve the quality of service, to ensure that we carry out your instructions correctly and to resolve any disputes.

Right of Access You have the right to request details of the data that we hold about you. We will provide the details within one month of a written request.

Account Closure Should you cancel your membership with us we will retain some records in order to meet our legal obligations and to deal with any dispute resolution at a future date.

Complaints We will always make every effort to resolve any complaint to your satisfaction, however, if you wish to complain about how we are using your data you can complain to the Information Commissioner's Office who oversee data protection in the UK.

Website: - <https://www.fernsoftware.com/> **Telephone:** - 028 9080 8000

Fern Credit Union Ltd is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Registered No 213291) and is a member of the Financial Ombudsman Scheme

Address: - Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Your rights explained Right to Access

You can request a copy of all your personal data held for the purpose of processing by ourselves. We will provide a copy within 1 month of a request.

The right to rectification

We will always endeavour to keep your data accurate and up to date but if you become aware that we hold inaccurate or incomplete data you have the right to have it corrected.

The right to erasure

You have the right to the erasure of your personal data without undue delay including where: -

- the personal data is no longer needed for the purpose it was originally processed
- you withdraw consent you previously provided to process the information
- you object to the processing under certain rules of data protection law
- the processing is for marketing purposes
- the personal data was unlawfully processed

However, the data cannot be erased where we need it to meet a legal obligation or where it necessary for the establishment, exercise or defence of legal claims.

The right to restrict processing

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data
- processing is unlawful but you oppose erasure
- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and
- you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data.

We will only otherwise process it:

- with your consent;
- for the establishment, exercise or defence of legal claims; or
- for the protection of the rights of another natural or legal person;

The right to object to processing

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the data is necessary for the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

The right to data portability

To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of our contract with you

You have the right to receive your personal data from us in a commonly used and machine-readable format or instruct us to send this data to another organisation. This right does not apply where it would adversely affect the rights and freedoms of others.

Rights relating to automatic processing

We do not currently use automated processing.

Right to withdraw consent To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.