Website Usage Policy

Introduction

Kilrush Credit Union respects the rights of users of our website and is committed to protecting your privacy and ensuring that you continue to trust us with your personal data.

"Personal Data" is personal information about you as an individual such as your name, email address, address, telephone number and any information relating to you that we hold.

We will not collect your personal data on this website without your permission or otherwise in accordance with Data Protection legislation.

This Notice sets out:

- 1. Third party web sites
- 2. Scope
- 3. Acceptance
- 4. What personal data we collect and why we collect it
- 5. Consent
- 6. Who we share your personal data with
- 7. Your rights
- 8. Data security and retention
- 9. Information Security and Data Privacy awareness
- 10. How to contact us
- 1. Third Party Websites

Our web site contains links to other web sites. We are not responsible for the privacy practices of these other sites. We encourage you to be aware of this when you visit these sites and to read the privacy statements on other web sites you visit. This Privacy Notice applies solely to our web site.

2. Scope

This Privacy Notice applies to the personal data that we collect about you on our website or mobile application for the purpose of operating the website and providing

- \cdot information about your Credit Union
- · access to your account details and transactions (Online Banking)
- feedback features
- \cdot online membership and loan application facilities
- \cdot control over your contact preferences

3. Acceptance

By using our website or mobile application or by giving us your personal data, you accept the practices described in this Notice. If you do not agree to this Notice, please do not use our website or mobile application or give us any of your personal data.

We reserve the right to make changes to this Notice at any time and we encourage you to review this notice regularly to make sure you are aware of any changes and how your personal data may be used.

4. What personal data we collect and why we collect it

4.1 Information that you provide to us

When you submit an enquiry to us via our Enquiry Form or submit feedback, we ask that you submit your member number (optional), your name and email address along with your query or feedback. We ask for this information so that we can respond to your query.

When you apply for a loan via our website we will ask for information necessary to process your loan request such as Credit Union account details, your name, address, contact details, date of birth, marital status, accommodation details, employment and salary information and current debt information.

If you apply for membership of the Credit Union via our website we will ask for your name, address, phone number(s), email address, date of birth, employment and residential information.

If you register for Online Access we will ask for your Credit Union member number, your name, date of birth, phone number and email address. This information is necessary to process your application for Online Access.

4.2 Data gathered from all visitors to our website

We use Google Analytics 4 (GA4), a web analytics service provided by Google LLC, to better understand how visitors interact with our website and to improve our content and services. A4 collects data such as page views, user interactions, and technical information including your IP address, browser type, and device information. IP addresses are anonymized before storage or processing.

GA4 uses cookies and similar technologies to collect this information. These cookies are only activated if you provide consent through our cookie banner when you first visit our website.

We also use Meta Pixel on our website. The Meta Pixel is a piece of code provided by Meta Platforms, Inc. that helps us understand and track the actions users take on our site. This allows us to measure the effectiveness of our advertising and reach users with relevant ads on Facebook, Instagram, and other Meta platforms.

Through the Meta Pixel, information about your use of our website (such as pages visited, actions taken, and browser information) may be sent to Meta. This data may be used in accordance with Meta's Data Policy to help us deliver personalized ads and analyse the performance of our campaigns. We do not share personal data such as your name or email address with Meta as part of this process.

You can control how Meta uses your information for ad targeting by adjusting your advertising preferences in your Facebook account settings.

Our website also uses Cookies.

4.3 What are Cookies?

Cookies are files which are transferred to your computer's hard disk by a website. Cookies can store information about your preferences and other information which you need when you visit a website. The Credit Union uses cookies to monitor our website traffic, to ensure better service levels and in order to provide you with certain features such as the customised delivery of certain information.

To prevent the use of cookies you should activate the facility which is available in most web browsers that enables a user to deny or accept cookies. Click <u>here</u> to find out how to enable and deny cookies.

For more information about cookies see www.allaboutcookies.org

4.4 Why do we collect your personal data and what do we do with it?

We collect data for the following purposes

- \cdot to enable the correct functioning of this website
- \cdot to allow us to process queries or feedback that you submit to us
- \cdot to process applications for membership, access or credit that you submit to us

All the personal data that you submit is processed in the Credit Union by our staff. However, for the purposes of IT hosting and maintenance some of this information is located on servers within the European Union.

4.5 Are there consequences to not supplying Personal Data?

If you do not provide your personal data, we will not be able to process your application for membership.

5. Consent

5.1 What consent do we ask for?

Loan Applications: We will ask you for your consent to process loan application information (including disclosing it to third parties necessary for its processing) and to submit your information to a Credit Check bureau. You may decline to grant this consent however without this consent we will be unable to process your application.

Marketing Material: We may also ask for your permission to send you marketing material about carefully selected products and services that we feel would be of interest to you. You may decline to grant this permission without consequence.

Cookies: GA4

5.2 Can I withdraw my consent at any time?

Yes. You must be logged in as a Credit Union user in order to manage your consent online. You may also manage your consent by contacting us using the contact details listed at the bottom of this page.

Alternatively, you may write to us or call into Kilrush Credit Union at Credit Union House, Market Square, Kilrush, Co. Clare, V15 HN36

6. Who we share your personal data with

6.1 Information Technology service providers

We have engaged third parties for the supply of Information Technology services which allow us to process your information. These parties process your information under contract to us and are subject to the same European and national Data Protection laws as are we.

6.2 Transfer of information

We do not transfer your information outside of the EU.

Your information is processed entirely within the EU and, as such, is protected by Europeanwide Data Protection regulations.

7. Your Rights with Respect to Our Use of Your Data

You have several rights in relation to how we use your information.

- **Right of access** you have the right to request a copy of the information that we hold about you.
- **Right of rectification** you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** where certain conditions apply to have a right to restrict the processing.
- **Right of portability** you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** you have the right to object to certain types of processing such as direct marketing.
- **Right to judicial review:** in the event that we refuse your request under rights of access, we will provide you with a reason as to why.
- Right to object: to automated processing, including profiling.
- **Right to withdraw consent:** in the event that processing is based on consent you may withdraw consent at any time.
- Right to lodge a complaint with a supervisory authority.

If you wish to exercise any of your data rights, you can contact us by writing to the address above or emailing us.

If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why. If you make your request electronically, we will try to provide you with the relevant information electronically.

If you are not happy with any aspect of how your data is used, you also have the right to complain to the Data Protection Commission in Ireland. You can contact the Office of the Data Protection Commission at:

Telephone: +353 (0)761 0100 or Lo Call Number 1800 437 737

Online Contact Form: https://forms.dataprotection.ie/contact

Postal Address: Data Protection Commission, 6 Pembroke Row, Dublin 2, D02 X963

8. Data Security and Retention

We do not retain your personal information for longer than we need to in order to meet the objectives for which it was gathered.

When we are moving your data from one location to another, whether physically or digitally, your data will be encrypted. Where appropriate, data will be encrypted at rest.

9. Information Security and Data Privacy awareness

We provide Information Security and Data Privacy awareness training to all of our staff and we require any of our contracted suppliers who process your data to also provide similar awareness training to their staff.

10. How to contact us

10.1 Credit Union

This is the website of Kilrush Credit Union, Credit Union House, Market Square, Kilrush, Co. Clare, V15 HN36.

Phone: 065 905 1242

Email: info@kilrushcreditunion.ie

10.2 Data Protection Officer

Queries relating to Data Protection or relating to exercising any of your Data Privacy rights should be directed to our Data Protection Officer:

Name: Kilrush Credit Union

Phone: 065 905 1242

Email: dpo@kilrushcreditunion.ie