

## Privacy Notice

### Overview: -

We at Enterprise Credit Union are here to provide you, our members, with savings and loans that meet your needs. We are part of the community and are here to support you financially, encouraging you to save and borrow sensibly and in a way that you can manage. To do that we need to know a little about you and to hold information that allows us to: -

- make timely and informed decisions that do not cause hardship
- help you to manage your money well
- provide the products and services you want and need

Holding information or data about you means that we are classed as a data controller and we are subject to all of the data protection regulation. We are registered with the Information Commissioners Office or ICO (the regulator for data processing) under the reference Z5075264. <https://ico.org.uk/ESDWebPages/Search>

We work hard to keep your information confidential, safe and ensure that it is kept accurate and up to date. We only hold the data that we need to provide you with our products.

We may share your data to provide the services but will never sell it on for other firms to market their products to you and when we do share it we will limit the information to what is needed, ensure that it is secure and used only for the purpose intended and is destroyed once the required task has been completed.

### Collecting Information and Keeping it Accurate: -

When you join Enterprise, we ask for basic information to open the account, for identification purposes and to allow us to manage your share account. As time goes on you will probably want other products such as loans or different savings accounts and we will collect additional information from you via application forms, documents and when communicating with you.

When your circumstances change, such as amending to your address, phone or e-mail, you should advise us, and we will update our records to keep them accurate.

### Lawful Basis: -

You wouldn't want us holding unnecessary information about you and we wouldn't wish to do so, therefore the data we hold is limited to what we need. Regulation requires that we have a lawful basis for holding the data. We will ask for information for the following reasons: -

<b>Contract</b>	When we enter into an agreement with you, for example, upon joining. You agree to abide by the terms & conditions, and we agree to provide some financial services. To allow us to undertake those services, we need to hold data.
<b>Legal obligation</b>	Credit unions must comply with many regulations in order to safeguard you, your data and your funds. These require us to collect, hold and retain your data whilst running your account and some records after closure.
<b>Legitimate interests</b>	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. The holding of your data purposes such as this would be expected and would fall under this heading.
<b>Consent</b>	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 marketing consent at any time simply by contacting us and letting us know that you do not wish to be contacted in this way.

## Retaining Information: -

Enterprise is a Credit Union and a Mutual Company owned by you, our members, and as such comes under some different regulation to most companies. These regulations such as the Cooperative and Community Benefit Societies Act 2014 require that we retain some information even after you close your account.

We do retain information but ensure that, like all member data, it is held securely and confidentiality is always maintained.

You have the right to ask us to erase your data, as defined below, but we would still need to retain some to meet our legal obligations.

## Sharing Data: -

To provide you with our services and meet our commitment to ensuring they meet your needs and do not cause you financial hardship, we must share your data at times with other firms and external agencies. Also, to help safeguard you and us in the prevention of fraud.

We have a legal obligation to share data with the authorities in certain circumstances.

At all times we will ensure that the data is secure and not used for any alternative purposes.

Areas where we share your data include: -

### **Credit Reference Agencies (CRAs)**

We use CRAs to provide electronic identification for new members. This is a very simple and efficient way of undertaking the legal requirements and prevents the need to ask for additional documentation from you which can be slow and cumbersome.

We also use them for undertaking loan assessments. We would not wish you to enter into loan with us that would cause you financial difficulty and that you cannot afford. A CRA search helps us review your finances and provides us with a much fuller picture, often without needing further information from you.

Provision of the above service requires us to also report on the performance of loans.

The CRA we use will depend on what we use it for and may change from time to time. The main CRA details are below: -

#### **Equifax Limited**

**Post:** Equifax Limited, Customer Service Centre PO Box 10036, Leicester, LE3 4FS  
**Web address:** [https://www.equifax.co.uk/Contactus/Contact\\_Us\\_Personal\\_Solutions.html](https://www.equifax.co.uk/Contactus/Contact_Us_Personal_Solutions.html)  
**Email:** UKDPO@equifax.com  
**Phone:** 0333 321 4043 or 0800 014 2955

#### **Experian Limited**

**Post:** Experian, PO BOX 9000, Nottingham, NG80 7WP  
**Web address:** <https://www.experian.co.uk/consumer/contactus/index.html>  
**Phone:** 0344 481 0800 or 0800 013 8888

#### **TransUnion International UK Limited**

**Post:** TransUnion, One Park Lane, Leeds, West Yorkshire, LS3 1EP  
**Web address:** <https://www.transunion.co.uk/consumer/consumer-enquiries>  
**Email:** consumer@transunion.co.uk

**Phone:** 0330 024 7574

### **HMRC**

We are obliged to advise the Revenue of Dividends paid to members in excess of an agreed figure (currently £250) in line with other savings providers. We also have to undertake an annual report of non-UK tax payers.

### **Mailing Firms**

If we are sending out information to all members or large numbers, we may utilise the services of a mailing firm. Information provided to them would be secure, limited to the minimum they need to process the mailing and we would ensure that it is not used for any other purpose and is destroyed once the process has taken place.

### **Fern Software**

Fern Software provide us with the software to run your account and hold the data on our behalf. We ensure that they have very high standards for security and back up to keep the data safe.

### **Fraud Prevention Firms**

Under regulation for Anti-Money Laundering we utilise the services of fraud prevention firms from time to time.

### **Law Enforcement**

We are occasionally asked to provide information for legal cases or police investigations which we must comply with.

### **External Auditors**

We must share limited data with our auditors for production of the year end accounts and also for internal checking of our systems and controls, and compliance to regulation.

### **Payroll Providers**

If you work for a firm that provides payroll deduction services to Enterprise, we may need to pass information regarding the amount etc in line with your requirements.

## **Your Rights**

Regulation is there to protect you, and the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 strengthened your rights with respect to the holding, use and processing of your data. Under this legislation you have the following rights: -

### **Right to Access**

You can request a copy of all your personal data held by us and we will provide a copy within 1 month of a request.

### **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.

### **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.

### **Right to Restrict Processing**

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

- 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

### **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.

### **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, but should it be introduced you have the right to ask for human intervention in the process.

### **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.

## **Complaints: -**

Details of how to complain are available on the website and in any branch. 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://ico.org.uk>

**Telephone:** - 0303 123 1113

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

## 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.