# 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.

Information Commissioners - Data protection register - entry details (ico.org.uk)

Note references to GDPR refer to the UK Regulation not the EU version.

We work hard to keep your information confidential, safe and ensure that it is 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, 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 may collect additional information from you via application forms, documents and when communicating with you.

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

We collect and update your records from: -

- ➢ Applications for products & services.
- ➢ Verbal contact in person or via telephone calls.
- ➢ Written communication such as letters, or electronic communications such as e-mail or fax.
- ➢ For transactions such as withdrawals.
- ➢ Interaction via the website and App using cookies.
- ➢ Payroll if you pay direct from salary.
- ➢ Credit reference agencies and open banking providers when you apply for a loan.
- ➢ Identification documents.

## What Information do we Hold?

We collect personal data in order to provide you with the services we offer. We will never knowingly collect or process unnecessary data. The data we hold for members includes: -

- Personal details: - Name, date of birth, gender where offered, next of kin for beneficiary purposes.
- Contact details: - Address, e-mail, telephone numbers.
- National Insurance Number if you link benefit payments to a loan.
- Tax residency if you live abroad for Inland Revenue requirements.
- Marketing preferences – to indicate whether you wish to receive marketing or not.
- Number and age of dependents where you rely upon child benefit for loan repayments.
- Bank details for withdrawals and loans.



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- Credit reference agency and open banking details when you apply for a loan.
- Payroll details if you save directly from your salary.
- Transactions on your account.
- Notes – we may record notes on our records of information you have provided us with that will help with running your account.
- Identification details

We hold this information so that we can provide the savings and loan products for you and to ensure that we are able to confirm that it is you we are dealing with, prevent fraud, make accurate and correct assessments, react quickly to your needs and requests, and always act in a professional and ethical way when we interact with you. The lawful basis for holding your data comes under one of those listed below.

## Lawful Basis: -

Your data will be processed in line with the GDPR regulatory definitions on the lawful basis. There are others but most would come under the four listed below: -

**1 - Contract** Upon joining we enter into an agreement. 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 your data. When you apply for a loan, we both enter into a contract which defines the terms. Any other products you apply will similarly have contracts to define the agreement.

**2 - 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. Where legislation such as the Cooperative and Community Benefit Society Act or regulation, principally from the PRA and FCA but also from the like of the ICO for data protection we have a legal obligation to collect and often retain data.

**3 - 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. Legitimate interest refers to where the processing is necessary to provide the services. An example could be holding your bank details so that we can process share withdrawals and loans.

**4 - 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 marketing consent at any time simply by contacting us and letting us know that you do not wish to be contacted in this way. We also ask for consent before using Open Banking when assessing a loan application.

## 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 including name, contact details and transactions. We retain other information such as loan documentation for 6 years after repayment in case there is a query post account closure.

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, at times, share some of your data with other firms and external agencies. As a



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financial institution we are required to provide regulators with data and also, to help safeguard you and ourselves in the prevention of fraud.

Your data will only be shared in line within the Lawful bases described above and we will ensure that the data is secure and not used for any alternative purposes. If it is shared or stored outside of the UK or EEA we will ensure that it is secure and only used for the specific purpose of maintaining your account and providing services, in line with the GDPR and Data Protection Act 2018.

Below is a list of areas where we may share your data and examples of who we share with are included: -

| | Lawful Basis | Purpose & Examples |
|---|---|---|
| **HMRC** | **2** | We are legally 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 taxpayers. |
| **Mailing Firms** | **3 & 4** | If we are sending out information to all members or large numbers, we have a legitimate interest to 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.<br>Marketing will only be undertaken to members who have given consent.<br>• Zync Digital.<br>• Pluvio. |
| **Fern Software** | **3** | Fern provides 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** | **2** | We have a legal duty to prevent money laundering under which we may utilise the services of fraud prevention firms from time to time.<br>• Stubbs Gazette. |
| **Law Enforcement** | **2** | We are occasionally asked to provide information for legal cases or police investigations which we must comply with. |
| **Payroll Providers** | **4** | If you work for a firm that provides payroll deduction services to Enterprise, we may need to pass information to confirm your payroll number and the amount you wish to save etc, only with your consent and in line with your requirements. |
| **Banks** | **4** | For money transmission and card payment purposes.<br>• Various Banks.<br>• Adelante for card payments. |
| **Audit** | **2** | We are legally obliged to have both Auditors to produce our year end accounts and Internal Auditors to review processes and compliance to Regulation.<br>• Alexander Sloan Auditors.<br>• SB & P Auditors. |
| **Debt Recovery** | **3** | For recovery action in respect loan arrears where a member is not repaying a loan in line with their contractual agreement. We have a legitimate interest to use external service providers to assist with recovery.<br>• Wilkin Chapman Solicitors. |
| **Service Providers** | **3** | We have a legitimate interest in working with external service providers which may involve some data sharing. This will be only for essential data and care will be taken to ensure all safeguards are in place to prevent any unauthorised use or retention by the firms we use. It will only be utilised to provide the best services we can for our members.<br>• RSign for automated loan agreements & document signing.<br>• CU Apps – to provide a phone App.<br>• Feefo – for feedback on services and quality maintenance. |



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| | | |
|---|---|---|
| **Open Banking & CRAs** | **4** | We have a duty to ensure affordability before lending to members so utilise the services of credit referencing firms. We specifically ask permission to use open banking and consent to use CRA firms is one of the conditions of a loan.<br>• Friendly Score – open banking to remove the requirement for bank statements.<br>• Experian & Equifax – to confirm & report on repayment history. |

## 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 lawful basis for this is twofold under legitimate interest and your consent when you apply for membership or a loan.

These firms will be compliant with the Credit Reference Agency Information Notice (CRAIN) which ensures strict use and storage of data. The details can be found on each firm's website, for example Credit Reference Agency Information Notice (CRAIN) | Experian

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/Contact-us/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/contact-us/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

## Your Rights

Regulation is there to protect you, and the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications Regulations (PECR), 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.



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### 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 Automated Decision Making

In certain circumstances we use an automated system to make, or assist with, lending decisions, using financial information you provide us. This is to help us provide an efficient service to our members. Should we ask you if we can use the system for your loan application, you have the right to opt-out of that process and request that a person reviews the application.



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**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.

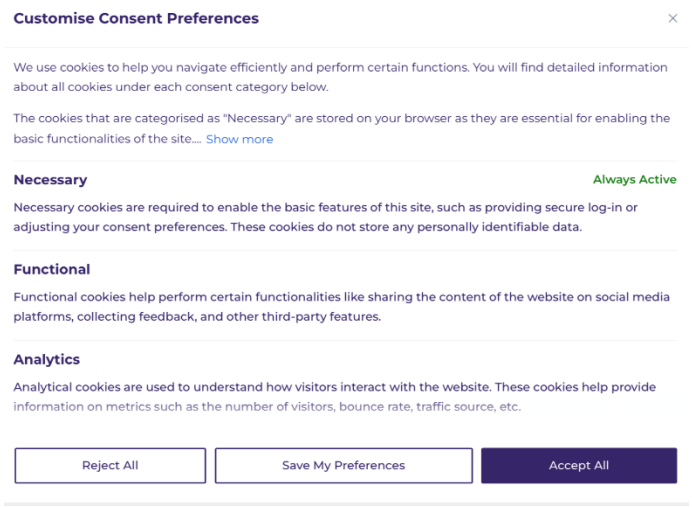
**Website: -** https://ico.org.uk
**Telephone: -** 0303 123 1113
**Address: -** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## Telephone Calls

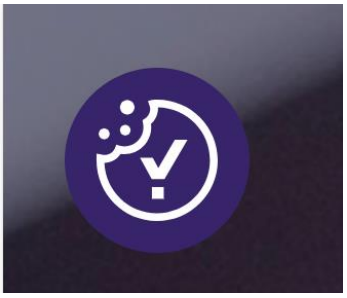
We record telephone calls to assist with training, improve the quality of service, to ensure that we carry out your instructions correctly and to resolve any disputes.

## Cookies

When you use our website or App, in line with other websites, we collect "cookies" in order to improve your experience. Cookies are small pieces of information which can be used for security purposes and for remembering how you interact with the website. They can also be used for internal analysing data. Refer to our Cookie Policy for more information.




You are asked to set your preferences on the first visit to the website.



If you wish to change your cookie preferences you can click on the link, bottom left of website.

## Updates to this Document

We will endeavour to keep this document up to date and accurate. Future versions will be available on our website.

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| **Address** | Enterprise Credit Union Ltd, Wynsford, Hall Lane, Huyton, Liverpool, L36 6AX |
| **Tel** | 0151 482 0177 |
| **E-mail** | contact@enterprisecreditunion.org |
| **Web** | www.enterprisecreditunion.org |
| **Complaints** | Enterprise Credit Union is a member of the Financial Ombudsman Scheme |



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