



Scottish Police

CREDIT UNION Limited

Serving The Police Family

FAIR PROCESSING NOTICE

Introduction

We gather and process your personal information in accordance with this privacy notice and in compliance with the relevant Data Protection Regulations and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Who are we?

Scottish Police Credit Union is a registered company in Scotland under company number 37CUs and has a registered office at 165 Baillieston Road, Garrowhill, Glasgow, G32 0TN. We can be contacted on this address or info@scottishpolicecu.co.uk.

Scottish Police Credit Union is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority and is registered with the Information Commissioner's Office (ICO), registration number Z6259391.

This privacy statement explains how Scottish Police Credit Union will use the personal information we collect about you and for which Scottish Police Credit Union remains the data controller.

What information do we collect about you?

Scottish Police Credit Union processes your personal information to meet our legal, statutory and contractual obligations and to provide you with products and services.

We collect personal information about you when you apply to join Scottish Police Credit Union as a member and when you make a loan application. We also collect information about you to register with us for online services.

This includes information about you such as:

- Name
- Age
- Date of Birth
- Contact details
- Employment
- Bank Account Details
- Personal / Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Nationality
- Family Member and next of kin details

Where we collect information from

We collect data from you in the following ways:

Data you give to us

- When you apply for our product and services
- When you communicate with us through email, post or telephone
- When you engage with us through our website
- In financial reviews and interviews
- When completing Customer surveys
- When you take part in Credit Union competitions or promotions

Data we collect when you use our services including the amount, frequency, type, location origin and recipients:

- Payment and transaction details (we do not store debit or credit card details)
- Profile and usage data including the profile you create to access online services and how you use these services such as time and frequency. This data is gathered from devices you use to connect to these services such as computers, laptops and mobile devices such as phones and tablets.
- Data from third parties we work with
- Credit Reference Agencies
- Payroll Service Providers
- Public Information sources such as the Accountancy in Bankruptcy and Financial Conduct Authority
- Government and law enforcement agencies

How will we use the information about you?

The personal information which we collect about you may be used in a number of different ways, for example:

- To make membership and lending decisions
- For fraud prevention
- For audit and debt collection
- For statistical analysis

Access to your Information and Correction

You have the right to access the information that Scottish Police Credit Union processes about you and to request information about:

- What personal data we hold about you
- The purpose of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold incomplete or inaccurate data about you, you have the right to request to ask us to correct and or complete the information as quickly as possible unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with the data protection laws including the right to object to direct marketing from us. Where applicable you have the right to data portability and the right to object to any automated decision making we may use.

If you would like a copy of some or all of your personal information, please email or write to us at the address at the bottom of this notice. We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Sharing and disclosing your personal data

We do not sell or lease your personal data with any other person or organisation outside of Scottish Police Credit Union.

We do not share or disclose your personal information without your consent, other than for the purposes of this notice or where there is a legal requirement for us to do so.

Scottish Police Credit Union may also share some of the personal information gathered about you with third parties but only in the strictly limited circumstances set out below.

Third parties

Scottish Police Credit Union uses third parties to provide some services and business functions, however all processors acting on our behalf only process data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and all other appropriate confidentiality and security measures.

Credit Reference Agencies (CRAs)

We may share your information with, and obtain information about you from, credit reference agencies or fraud prevention agencies.

It may be necessary to assist us in making a decision on your loan application, to perform credit and identity checks on you with a credit reference agency ("CRAs").

To do this, we will supply your personal information to Equifax and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- ✓ Assess your creditworthiness and whether you can afford to take the product;
- ✓ Verify the accuracy of the data you have provided to us;
- ✓ Prevent criminal activity, fraud and money laundering;
- ✓ Manage your account(s);
- ✓ Trace and recover debts; and
- ✓ Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you have a spouse or financial associate, CRAs will link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

You can find out more about the identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs on their websites.

Here are the links to the CRA we use and the Credit Reference Agency Information Notice (CRAIN) explaining what they do.

Equifax - <https://www.equifax.co.uk>

CRAIN - <https://www.equifax.co.uk/crain>

Lawful Basis for Processing

Contract - Some of the information we collect about you is collected on the lawful basis of a contract as, you have applied for membership or for a loan and we need to process your personal data in order to consider your application. We consider this basis for processing is necessary because we must collect personal information from you in order to:

- Confirm your identity and to carry out appropriate checks with other companies such as credit reference and fraud prevention agencies about your credit worthiness.
- If your application is approved, to set up your accounts and begin allowing you to save with us or take out a loan.
- Contact you about your application or the operation of your account, savings, loans or membership of Scottish Police Credit Union.

Legal Obligation - Some of the information we collect about you is collected on the lawful basis of compliance with a legal obligation to which Scottish Police Credit Union as a data controller is subject. We consider this basis for processing is necessary because, where appropriate, we will:

- Comply with a common law or statutory obligation
- Document our decision that processing is necessary for compliance with a legal obligation
- Identify the appropriate source for the legal obligation in question

It will not be possible to anticipate every legal obligation, but we will rely on this lawful basis for processing when we are required to process personal information to comply with a common law or statutory obligation. Examples may include court orders or obligations to disclose information about employees to HMRC. The information processed will depend upon the nature of the obligation imposed.

One specific legal obligation placed on credit unions is to inform members of the date and time of the credit union AGM. As such Scottish Police Credit Union will process the personal information of its members for this purpose and may record the contact preference of each member for this purpose.

Consent - Some of the information we collect about you is collected on the lawful basis of consent as you have given Scottish Police Credit Union clear consent for us to process

your personal data for specific reasons, namely to keep you informed about savings or loan products, offers or competitions offered directly by Scottish Police Credit Union and to obtain appropriate identifying information from your employer. We consider this basis for processing is necessary because prior to you providing this information we have:

- Obtained an explicit statement of consent from you, which is easily understood prior to providing any marketing information to you and will keep a record of this
- Offered you real choice and control over the use of your own personal information
- Made it easy for you to withdraw your consent and tell how this can be done

Safeguarding Measures

Scottish Police Credit Union takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place including but not restricted to SSL, TLS, encryption, restricted access, IT authentication, firewalls and antivirus/malware protection.

Consequences of not providing your data

It may be necessary for us to collect personal data from you by law, or under the terms of a contract we have with you.

If you choose not to provide information such as this it may delay or prevent us from meeting our obligations to you. It may also mean that we cannot perform services needed to run your accounts or services you have with us, which could mean we have to cancel a product or service we provide to you.

Any data that is optional at the time of collection will be made clear at the point of collection.

Marketing

We would like to send you information to keep you informed about savings or loan products, offers or competitions offered directly by Scottish Police Credit Union. To do this we will seek consent from you to provide this information but will ensure that we have:

- Made the request prominent and as far as possible separate in any document
- Asked you clearly and positively to opt into providing your consent for marketing consent
- Told you exactly what we will do with your information
- Kept a record of when and how we obtained your consent to marketing, along with a record of what you were told at that time.
- Identified any third-party data controllers who will rely on this consent
- Made it easy for you to withdraw your consent at any time
- Made provision to regularly review our basis for consent, to check that the relationship with you, the processing and the purposes have not changed

How long we keep your data

Scottish Police Credit Union only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these

obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed.

After you stop being a member, we may keep your data for up to 6 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our website and to compile statistical reports on website activity. For further information visit www.aboutcookies.org or www.allaboutcookies.org. You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

Other websites

Our website contains links to other websites. This privacy policy only applies to the website of Scottish Police Credit Union so when you link to other websites you should read their own privacy policies.

Amendments

Scottish Police Credit Union reserves the right at its sole discretion to amend this privacy statement at any time.

How to contact us

If you wish to exercise your rights regarding your personal information, have any questions about our privacy policy or if you are unhappy with how we have used your personal information, please email info@scottishpolicecu.co.uk, call on 0141 771 1314 or by post to 165 Baillieston Road, Glasgow, G32 0TN

You also have the right to complain to the Information Commissioner's Office (ICO). You can find out how to complain on their website at <https://ico.org.uk/>.