



Scottish Police

CREDIT UNION Limited

Serving The Police Family

Privacy Notice

Scottish Police Credit Union

Scottish Police Credit Union is a registered company in Scotland under company number 37CUs and has its registered office at 165 Baillieston Road, Garrowhill, Glasgow, G32 0TN.

Our contact details are:

Email: info@scottishpolicecu.co.uk

Telephone: 0141 771 1314

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.

Introduction

Scottish Police Credit Union ("we", "our", "us") collects and processes personal data 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.

We are committed to being transparent about how we handle your personal data, protecting the privacy and security of your personal data and meeting our data protection obligations under the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 ("DPA").

The purpose of this privacy notice is to make you aware of how and why we collect and use your personal data within Scottish Police Credit Union both during and after your membership with us. We are required under the UK GDPR to notify you of the information contained in this privacy notice.

Your personal data will be processed in accordance with our Data Protection Policy and this privacy notice. We retain personal data in paper and/or electronic format.

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 types of personal data 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, when you make a loan application and in the event of an insurance claim.

We also collect information about you when you register with us for online services access.

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
- Medical/Health information

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
- Where you make a claim on an insured product

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
- Data provided by medical/health professionals or employers requested as part of an insurance claim on an insured product or service
- Credit Reference Agencies
- Payroll Service Providers
- Public Information sources such as the Accountancy in Bankruptcy and Financial Conduct Authority
- Government and law enforcement agencies

Why do we collect your personal data?

We will only process your personal data in ways that the law permits. These are known as the legal bases for processing. We will process your personal data in one or more of the following circumstances:

- to allow us to operate the membership contract or contract for services we have entered with you.
- to allow us to make responsible lending decisions
- for the purposes of fraud prevention
- for the purposes of audit and debt collection
- for the purposes of statistical analysis
- where we need to comply with a legal obligation.
- where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests.
- We may also occasionally use your personal data where required to protect your vital interests (or someone else's vital interests).

We believe that you have a reasonable expectation, as a member, that we will process your personal data in order to fulfil our obligations to you under your contract of membership and to create or maintain a relationship with you.

What if you fail to provide personal data?

If you fail to provide certain personal data when requested we may not be able to perform the contract we have entered with you, provide the product or service in full which could mean we have to cancel a product or service we provide to you., or we may be prevented from complying with our legal obligations.

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

Why and how do we use sensitive personal data?

We will only collect and use sensitive personal data based on consent from you.

Information about your health or medical conditions is collected and processed so that we can perform or exercise our obligations under the Payment Waiver Insurance claims process and in line with our data protection policy.

The purposes for which we collect and process your personal health or medical data are to:

- assess your eligibility where you are making a claim under our Payment Waiver Insurance cover.
- Fulfil our claims obligations required by any insurer providing Payment Waiver Cover

Change of purpose

We will only use your personal data for the purposes for which we collected it unless this information is anonymised for statistical purposes.

If we need to use your personal data for a purpose other than that for which it was collected, we will provide you, prior to that further processing with information about the new purpose.

We will explain the legal basis which allows us to process your personal data for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

For how long does Scottish Police Credit Union keep your personal data?

We will only retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

We will hold your personal data for the duration of your membership and for 5 years after the end of our relationship with you or longer where we are required to.

The exceptions to retaining such personal data for this entire period are:

- where a successful Payment Waiver claim is approved any personal data supplied as part of the payment waiver claims process will only be retained by us for the period of the claim not exceeding 18 months.
- where a Payment Waiver claim is unsuccessful any personal data supplied as part of the payment waiver claims process will not be retained.

In addition, under the Co- Operative and Community Benefit Societies Act 2014 we are required to keep a permanent register of members limited to the following information.

- the member's name and postal address;
- where the member has notified the society of an electronic address for the purposes of receiving notices or documents under this Act, the electronic address and the purposes for which it has been notified;
- the number of shares held by the member and the amount paid or agreed to be considered as paid on the shares;
- a statement of other property in the society held by the member (whether in loans, deposits or otherwise);
- the date the person was entered on the register as a member;
- the date the person ceased to be a member.

Your rights in connection with your personal data?

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes, e.g. you change your home address, during your membership with us so that our records can be updated. We cannot be held responsible for any errors in your personal data in this regard unless you have notified us of the relevant change.

As a data subject, you have several statutory rights. Some rights are subject to certain conditions, and in certain circumstances it may not be possible to grant some or all of these rights, however you have the right to:

- ✓ **request access to your personal data** – this is usually known as making a subject access request (SAR) and it enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- ✓ **request rectification of your personal data** – this enables you to have any inaccurate or incomplete personal data we hold about you to be corrected

- ✓ **request the erasure of your personal data (known as the right to be forgotten)** – this enables you to ask us to delete or remove your personal data. This right is not absolute and only applies when:
 - the personal data is no longer necessary for the purpose which we originally collected or processed it for;
 - we are relying on consent as our lawful basis for holding the data, and you withdraw consent;
 - we are relying on legitimate interests as our basis for processing and there is no overriding legitimate interest to continue this processing;
 - we are processing the personal data for direct marketing purposes and you object to that processing;
 - we have processed the personal data unlawfully;
 - we must do it to comply with a legal obligation; or
 - we have processed the personal data to offer information society services to a child.

- ✓ **restrict the processing of your personal data** – this enables you to ask us to suspend the processing of your personal data, e.g. if you contest its accuracy and so want us to verify its accuracy

- ✓ **object to the processing of your personal data** – this enables you to ask us to stop processing your personal data where we are relying on the legitimate interests of the business as our basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground

- ✓ **data portability** – this gives you the right to request the transfer of your personal data to another party so that you can reuse it across different services for your own purposes

If you wish to exercise any of these rights in relation to the data held with us, please contact our Data Protection Officer (DPO), Ian Caldwell (Compliance & Policy Manager)

Sharing, disclosing & transferring 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.

Scottish Police Credit Union does not transfer data out with the United Kingdom.

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, GDPR requirements and 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. 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 by direct marketing 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 at any time and tell you 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

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 Scottish Police Credit Union so when you link to other websites you should read their own privacy policies.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 8th August 2022.

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.

Information Commissioner's Office (ICO)

If you believe that we have not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO <https://ico.org.uk/> is the UK supervisory authority for data protection issues. More information on making a complaint can be found at <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113.