

## **Privacy Notice**

Serve and Protect Credit Union is committed to protecting our members' privacy. Any information we ask you for that is marked as mandatory is required to meet our legal obligations or to enable us to perform our contract with you. Where you are not able to provide us with this information, we may not be able to open an account for you or offer you a loan. Where we request information from you that is not required for these purposes, we will ask for your permission

### **How we use your personal information**

Serve and Protect Credit Union may process, transfer and/or share your personal information in the following ways:

#### **When we're legally obliged to:**

- Confirm your identity
- Perform activity for the detection and prevention of fraud and financial crime
- Carry out internal and external auditing
- Record information about you on our members' register
- Record details about your nominated beneficiary

#### **To provide you any services you sign up for:**

- Deal with your account(s) or run any other services we provide to you
- Consider any applications made by you
- Carry out credit checks and to obtain and provide credit references
- Undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business
- To send you statements, new terms and conditions (including changes to this privacy notice), information about changes to the way your account(s) operate and notifications of our general meetings

#### **For our legitimate interests:**

- Recover any debts owed to us
- Maintain insurances to you as part of your membership

#### **With your clear permission:**

- Maintain our relationship with you including marketing and market research (if you agree to them)

### **Sharing your personal information**

We will disclose information outside the Credit Union:

- To third parties to confirm your identity and comply with money laundering legislation
- To credit reference agencies and debt recovery agents who may check the information against other databases – public and private – to which they have access
- To any authorities if compelled to do so by law e.g. to HM Revenue & Customs to fulfil tax compliance obligations
- To fraud prevention agencies to help prevent crime or where we suspect fraud
- To any persons, including but not limited to, insurers, who provide a service or benefits to you or for us in connection with your accounts

- To our suppliers in order for them to provide services to us and/or to you on our behalf, for example, we used a mailing firm to distribute correspondence from time to time
- To anyone in connection with a reorganisation or merger of the credit union's business
- If you have opted to save and/or borrow with the Credit Union via payroll deduction we share your name and unique identifier(s) (NI Number/ payroll/employee number) to enable us to do this. We tell them how much to deduct from your salary, on your instruction, but we do not share whether this is for savings or a loan repayment

### **Where we send your information**

While countries in the European Economic Area (EEA) ensure rigorous data protection laws, there are parts of the world that may not be quite so rigorous and do not provide the same quality of legal protection and rights when it comes to your personal information.

Serve and Protect Credit Union does not directly send any information to any country outside of the EEA, however any part receiving personal data may also process, transfer and share it for the purposes set out above and in limited circumstances this may involve sending your information to countries where data protection laws do not provide the same level of data protection as the UK.

For example, when complying with international tax regulations we may be required to report personal information to HM Revenue & Customs which may transfer that information to tax authorities where you or a connected person may be a tax resident.

### **Retaining your information**

We will need to retain your personal data for various lengths of time depending on what we use your data for. In many cases we will keep this data for a period of time after you have left the Credit Union.

To read more about our data retention schedule please contact us at [info@serveandprotectcu.co.uk](mailto:info@serveandprotectcu.co.uk) or 0121 700 1222.

### **Credit Reference Agencies**

In order to process loan applications you make we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid in full on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associations. This may affect your ability to get credit.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail here: <https://www.transunion.co.uk/crain>

### **Fraud Prevention Agencies**

In order to prevent fraud and money laundering and to verify your identity we will share your information with fraud prevention agencies. Further information on how the agencies use your personal data can be found here: <https://www.cifas.org.uk/fpn>

## **Your Rights**

Your rights under data protection law are:

- a) The right to be informed
- b) The right to access
- c) The right of rectification
- d) The right to erasure
- e) The right to restrict processing
- f) The right to data portability
- g) The right to object to data processing
- h) Rights related to automated decision-making and profiling
- i) The right to withdraw consent
- j) The right to complaint to the Information Commissioner's Office

## **Your rights explained**

### **Right to be informed**

You have the right to be informed about how we process your personal information.

### **Right to access**

You have the right to access your personal data and details of the purposes of processing, the categories of personal data concerned, and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply you with a copy of your personal data. You can access your personal data by visiting [URL] when logged in to our website.

### **Right to rectification**

You have the right to have any inaccurate personal data about you corrected, and, taking into account the purposes of the processing, to have any incomplete data about you completed.

### **Right to erasure**

In some circumstances you have the right to the erasure of your personal data without any undue delay. Those circumstances include:

- 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, you may not erase this data where we need it to meet a legal obligation or where it is necessary for the establishment, exercise or defence of legal claims.

### **The right to restrict processing**

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

- You contest the accuracy of the personal data

- Processing is unlawful but you oppose its 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
- 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 otherwise only process it:

- With your consent
- For the establishment, exercise or defence of legal claims
- For the protection of the rights of another natural or legal person

### **The 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 of that data is necessary for the purposes of the legitimate interests pursued by us or 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 wish to make such an objection, we will cease to process your data for this purpose.

### **The right to data portability**

To the extent that the legal basis of 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 the data to another organisation. This right does not apply where it would adversely affect the rights and freedoms of others.

### **Rights related to automated processing**

The Credit Union does not currently automate any decisions about your ability to join or borrow from us. If this changes in the future, we will update this notice and write to you to let you know.

### **The right to complain to the Information Commissioner's Office**

If you consider that our processing of your personal information infringes on data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office which is responsible for data protection law in the UK. You can contact them using the following details:

<https://ico.org.uk>

0300 123 1113

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF

### **Contact us about your rights**

Serve and Protect and Serve and Protect Credit Union are trading names of Police Credit Union Limited.

Police Credit Union Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (213306).

For more information about how your rights apply to your membership of Serve and Protect Credit Union or to make a request under your rights you can contact us at [info@serveandprotectcu.co.uk](mailto:info@serveandprotectcu.co.uk) or phone us at 0121 700 1222. We will respond to your request within one month or provide an explanation of the reason for our delay.

**Contact Details of Serve and Protect Credit Union**

Name: Police Credit Union Limited (trading as Serve and Protect Credit Union)

Address: Guardian's House, 211 Coventry Road, Birmingham, B26 3EA

Phone: 0121 700 1222

Email: [info@serveandprotectcu.co.uk](mailto:info@serveandprotectcu.co.uk)

**Changes to this privacy notice**

We can update this privacy notice at any time and ideally you should check it regularly for updates. We won't alert you for every small change but if there are any important changes to the policy or how we use your information we will let you know and where appropriate ask for your permission.