

# Swan Privacy Notice

## **Introduction**

Swan Credit Union is a member-owned and run savings and loans organisation, with the explicit purpose of providing affordable loans to members and offering a safe place for member savings.

Swan operates through the identities of local Community Banks, which represent the Credit Union in Milton Keynes, Aylesbury Vale, and South Oxfordshire. People wishing to join the Credit Union may do so either on our website, or by using the relevant form. This notice provides information on how Swan Credit Union, and our administrative partner organisation, Credit Union Solutions, use personal data collected from prospective members, members and members' beneficiaries, and Swan volunteers.

## **Data Protection Regulations**

We are regulated by the EU General Data Protection Regulation 2018.

## **Staying Legal**

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data, including:

### Consent

In specific circumstances we can collect and process your data with your consent – for example when you tick a box to receive email or paper newsletters.

### Contractual obligation

If you take out a loan, for example, we are obliged to use your personal data to manage the transaction.

### Legal compliance

If we suspect fraud, we are legally bound to report it to the appropriate authority.

### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your transaction history to make better decisions on future loan applications. We will also use your address details to send you newsletters and direct marketing by email or post, telling you about products and services we think might interest you.

## **When do we collect your personal data?**

- When you visit our website
- When you engage with us on social media
- When you contact us by any means with queries or a complaint
- When you join as a member
- When you apply for a loan
- When you enter prize draws or competitions
- When you choose to complete any survey we send you
- When you've given a third party permission to share with us the information they hold about you

## **What sort of personal data do we collect?**

### Joiners

- Contact details, such as a title, names, address, email and phone numbers, date of birth
- Identity verification, such as a driving licence, passport or National Insurance number
- Bank/Building Society details, including account number and sort code
- Joiner's beneficiary contact details

Borrowers (some of this data may be collected by third parties for the purposes of ID and credit checking)

- Employer's details
- Employment history
- Residential status
- Credit history
- Regular outgoings
- Bank statements

### Volunteers

As a member-owned and run, not-for-profit organisation, Swan is heavily dependent on volunteers: both to help with local activities and for certain specific roles, such as Board membership. We collect contact details and take references on all volunteers.

## **What we do with the information we gather?**

In order to process membership and loan applications the Credit Union will pass on the personal data given to associated organisations necessarily used for the purpose. These will include our back office provider and administrative partner, [Credit Union Solutions](#) (CUS) and also both Credit Reference Agencies and Fraud Prevention Agencies.

We use your contact information to send you news about products and promotions, and we provide members with this service (until required by them to stop doing so by clicking on the 'unsubscribe' link) through the 'opt-in' tickboxes on our website forms.

A Swan Credit Union Director acts as Senior Information Risk Owner (SIRO), and may be contacted by email at [gdpr@swancreditunion.org.uk](mailto:gdpr@swancreditunion.org.uk) or by telephone to CUS on **03030 300147**.

## Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures in our **Information Security Policy** to safeguard and secure the information we collect online.

## Where do we send your data?

While countries in the European Economic Area (EEA) all 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.

Swan does not send your data outside the EEA, but third party organisations who we share data with might do so in limited circumstances – such as in complying with international tax regulations where UK tax authorities may share such data with counterparts in countries where you or a connected person may be tax resident.

## How long do we keep your personal data?

We are required by law to only keep your personal data for the period necessary to fulfil the purpose for which it was given, subject to either our legal obligations and/or your request for the data to be corrected or deleted. The procedures are described in our **Data Retention Policy**.

## Who do we share your personal data with?

We only share your data with trusted third parties that we use in order to deliver the service required by our members, and to fulfil our legal obligations. We only provide information specific to the need, and we are obliged to ensure their data protection policies are effective. These organisations may have access to your data for the purposes specified:

- Credit Union Solutions: Processing member transactions and acting on Swan's behalf in communication with members
- Kesho: Operating the account software
- Prominent Media: Hosting our website
- GB Group: Identity checking
- Equifax: Credit referencing
- Postforce: Mail
- Mailchimp: E-newsletters

- Nimbusweb: Data Services to CUS
- Judge & Priestley: Legal services
- Contis Group: Engage Card Services
- Restore: Imaging & archiving for CUS

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

In order to process credit applications you make we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about 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 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 associates. This may affect your ability to get credit.

### **What are your rights over your personal data?**

You have the right to request the following, which we must action within one month of a validated request:

- Access to the personal data we hold about you, which we will provide in a data-portable format, and which will in most cases be provided free of charge, but which is legally chargeable under certain circumstances.
- The correction of your personal data when incorrect, out of date, or incomplete. For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end
- That we stop using your personal data for direct marketing (either through specific channels, or all channels). Please note that you may continue to receive communications after changing your preferences while our systems are fully updated.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
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You may request details of personal information which we hold about you under the General Data Protection Regulations 2018. If you would like a copy of the information held on you please write to us at:

Swan Credit Union, The Bungalow, Pinkwell Lane, Hayes UB3 1PE

If you believe that any information we are holding on you is incorrect or incomplete, please write to us or [email us](#) as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

### **Checking your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

### **Contacting the Regulator**

If you feel that your data has not been handled correctly, in the first instance the Information Commissioner's Office (ICO) want you to take this up with us, but if you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the ICO.

You can contact them by calling **0303 123 1113**

Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (opens in a new window; please note we can't be responsible for the content of external websites)

### **Any Questions?**

If you have any questions that haven't been covered, please contact our SIRO by email at [gdpr@swancreditunion.org.uk](mailto:gdpr@swancreditunion.org.uk) or by phone on **03030 300147**