



## **PRIVACY**

How your personal information is used by Carlisle and District Credit Union Ltd.

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

This privacy notice is to let you know how Carlisle and District Credit Union look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer and about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

### **Our Privacy promise**

We Promise:

- To keep your data safe and private
- Not to sell your data
- To give you an option to review your marketing at any time.

### **Who we are**

Carlisle and District Credit Union Ltd, the data controller, is a financial co-operative which promotes savings and offers affordable loans. It is owned and run by its members.

Credit Unions are regulated by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) which ensures that they are being run according to safe financial guidelines.

Credit Unions, like banks, are covered by the Financial Services Compensation Scheme (FSCS) which means that if a credit union is forced to close for any reason all savings are completely secure.

We aim to give a high standard of customer service at all times.

You can find out more about us at [www.carlislecu.com](http://www.carlislecu.com)

If you have any questions, or want more details about how we use your personal information, you can call us on 01228 594007 or email us at [info@carlislecu.com](mailto:info@carlislecu.com)

### **How the law protects you**

As well as our Privacy Promise, your privacy is protected by law. This section explains how it works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Carlisle and District Credit Union. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

<b>What we use your personal information for</b>	<b>Our Reasons</b>	<b>Our Legitimate interests</b>
<ul style="list-style-type: none"> <li>• To manage our relationship with you or your business.</li> <li>• To develop new ways to meet our customers' needs to grow and to grow our business.</li> <li>• To study how our customers use products and services from us.</li> <li>• To develop and carry out marketing activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> <li>• Your consent.</li> </ul>	<ul style="list-style-type: none"> <li>• Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</li> <li>• Being efficient about how we fulfil our legal duties.</li> </ul>
<ul style="list-style-type: none"> <li>• To develop and manage our, products and services.</li> <li>• To manage how we work with other companies that provide services to us and our customers.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

What we use your personal information for	Our Reasons	Our Legitimate interests
<ul style="list-style-type: none"> <li>• To deliver all of our products and services.</li> <li>• To make and manage customer payments.</li> <li>• To manage fees, charges and interest due on customer accounts.</li> <li>• To collect and recover money that is owed to us.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Complying with regulations that apply to us.</li> </ul>
<ul style="list-style-type: none"> <li>• To detect, investigate, report, and seek to prevent financial crime.</li> <li>• To manage risk for us and our customers.</li> <li>• To obey laws and regulations that apply for us.</li> <li>• To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.</li> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

What we use your personal information for	Our Reasons	Our Legitimate interests
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<ul style="list-style-type: none"> <li>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit.</li> </ul>	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect.</li> <li>Complying with regulations that apply to us.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<ul style="list-style-type: none"> <li>To exercise our rights set out in agreements or contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> </ul>	

## Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

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Type of Personal Information	Description
Financial	Your financial position, status and history.
Contact	Where you live and how to contact you.

Socio Demographic	This includes details about your work or profession, nationality, education and where you're fit into general social or income groupings.
Transactional	Details about payments to and from your accounts with us
Contractual	Details about the products or services we provide to you.
Locational	Data we get about where you are, such as may come from your mobile phone
Behavioural	Details about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Your family, friends and other relationships.
Open Data and Public Records	Details about you that are in public records as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.
Documentary Data	Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence or birth certificate.
Special Types of Data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> </ul>

	<ul style="list-style-type: none"> <li>• Health data including gender</li> <li>• Criminal convictions and offences</li> </ul>
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, whether you get paper statements or prefer large-print formats.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

## Where we collect personal information from

We may collect personal information about you from these sources:

### Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone or in the office
- When you use our websites
- In emails and letters and texts
- In insurance claims or other documents

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

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our website. It also includes data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

### Who Do We Share Your Personal Information With?

CADCUL does not share your personal information with any third parties, other than those listed below.

When we share your personal data with these third parties who perform services for us, we require them to take appropriate steps to protect your personal information, and only to use the personal information for the purpose of performing those specific services.

We currently use:

Name of company/organisation	The service they perform for us
Ecfs	IT hosting
Castle Computers	IT maintenance
Lindley Adams ,Halifax	Accountants

Unity trust Bank	Bank
Burnetts ,Carlisle	Debt collection
Equifax	Credit Reporting
Dwp	Eligible Loan Deduction Scheme
Credit Union Insurance Consultants Ltd	Loans Insurance cover
Stop the loan Shark Team	Incentive scheme

During any such process data supplied will only be done if they agree to keep your data safe and private.

## Automated Lending Decisions

Carlisle & District Credit Union Ltd does not make decisions about you through an automated process (without any human involvement)

## Credit Reference Agencies (CRAs)

We carry out credit and identity checks when you apply for a product or services for you and your business. We may use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that the CRAs have, to help us manage those accounts.

We will share your personal information with CRAs and they will give us information about you. The data we exchange can include:

- Name, address and date of birth
- Credit application
- Details of any shared credit
- Financial situation and history
- Public information, from sources such as the electoral register and Companies House.

We'll use this data to:

- Assess whether you are able to afford to make repayments
- Make sure what you've told us is true and correct
- Help detect and prevent financial crime
- Manage accounts with us
- Trace and recover debts
- Make sure that we tell you about relevant offers.

We will go on sharing your personal information with CRAs for as long as you are a customer. This will include details about your settled accounts and any debts not fully repaid on time. It will also include details of funds going into the account, and the account balance. If you borrow, it will also include details of your repayments and whether you repay in full and on time. The CRAs may give this information to other organisations that want to check credit status. We will also tell the CRAs when you settle your accounts with us.

When we ask CRAs about you, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

You can find out more about the CRAs on their websites, in the Credit Reference Agency Information Notice. This includes details about:

- Who they are

- Their role as fraud prevention agencies
- The data they hold and how they use it
- How they share personal information
- How long they can keep data
- Your data protection rights.

Here are the three main Credit Reference Agencies:

Callcredit

Equifax

Experian

## **Fraud Prevention Agencies (FPAs)**

We may need to confirm your identity before we provide products or services to you. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud or money-laundering risks. We use Fraud Prevention Agencies to help us with this.

Both we and fraud prevention agencies can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

We will use the information to:

- Confirm identities
- Help prevent fraud and money laundering
- Fulfil any contracts you or your business has with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime.

FPAs can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money laundering.

### **The information we use**

These are some of the kinds of personal information that we use:

- Name
- Date of birth
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Employment details

The information we have for you are made up of what you tell us, and data we collect when you use our services.

We and FPAs may process your personal information to look for fraud by studying patterns in the data. We may find that an account is being used in ways that fraudsters work. Or may find that an account is being used in a way that is unusual for you or your business. Either of these could indicate a possible risk of fraud or money-laundering.



## **How this can affect you**

If we or an FPA decide there is a risk of fraud, we may stop activity on the accounts or block access to them. FPAs will also keep a record of the risk that you or your business may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

## **Data transfers out of the EEA**

FPAs may send personal information to countries outside the European Economic Area (EEA). When they do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA. This may include following international frameworks for making data sharing secure.

## **Sending data outside of the EEA**

We will only send your data outside of the European Economic Area (EEA) to:

- Follow your instructions.
- Comply with a legal duty

## **If you choose not to give personal information**

We may need to collect information by law, or under the terms of a contract we have with you.

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

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

## **Marketing**

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and services may be relevant for you.

## **How long we keep your personal information**

We will keep your personal information for as long as you are a customer of Carlisle and District Credit Union Ltd.

After you stop being a customer, we may keep your data for up to 7 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 7 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.

## How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

Carlisle and District Credit Union Ltd  
95 Lowther Street  
Carlisle  
CA3 9ED

## Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

## What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and the 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict that use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant any more, but you want to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

## How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

## Future formats for sharing data

You will have the right to get your personal information from us in a format that can be easily reused. You can ask us to pass on your personal information in this format to other organisations.

## **How to complain**

Please let us know if you are unhappy with how we have used your personal information. You can contact us using our complaints form.

You also have the right to complain to the Information Commissioner's office. Find out on their website how to report a concern.