

Grampian Credit Union Privacy Notice

We are committed to protecting our members' privacy. The credit union requires any information marked as mandatory for membership to either meet 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. Where we request further information about you not required for these reasons, we will ask you for your consent.

How we use your personal information

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

For legal reasons: Personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Personal Information is used:

- to confirm your identity
- to perform activity for the prevention of financial crime
- to carry out internal and external auditing
- to record basic information about you on a register of members
- where processing is required to comply with applicable laws, regulatory requirements, or statutory obligations.

For performance of our contract with you: where processing is necessary to deliver services or meet contractual obligations, including obligations involving CRAs. Personal information is used to:

- 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 & conditions (including changes to this privacy statement), information about changes to the way your account(s) operate and notification of our annual general meeting.

For our legitimate interests: Our legitimate interests include operating our business, fulfilling contractual obligations, ensuring system and data security, preventing fraud, supporting audit and compliance activities, and protecting CRAs data. These interests are balanced against the rights and freedoms of individuals, with appropriate safeguards in place.

Where processing is necessary for legitimate business purposes, and where such interests do not override the rights and freedoms of individuals, personal information can be used to:

- recover any debts owed to us

With your consent: where required by law, and where individuals have been provided with a clear choice and the ability to withdraw consent at any time. Personal information is used to:

- 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 help us confirm your identity to comply with money laundering legislation
- to credit reference agencies and debt recovery agents who may check the information against other databases – private and public – to which they have access to
- 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 account(s)
- To our suppliers for them to provide services to us and/or to you on our behalf
- to anyone in connection with a reorganisation or merger of the credit union's business
- other parties for marketing purposes (if you agree to this)

Where we send your information

While countries in the European Economic Area 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.

The credit union does not directly send information to any country outside of the European Economic Area, however, any party 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 the HM Revenue and Customs which may transfer that information to tax authorities in countries where you or a connected person may be tax resident.

Retaining your information

The credit union will need to hold your information for various lengths of time depending on what we use your data for. In many cases we will hold this information for a period after you have left the credit union.

To read our policy for retaining members data please see: www.grampiancreditunion.co.uk or contact us at: admin@grampiancreditunion.co.uk or 01224 561506

Credit Reference and Affordability Checks

To process credit applications that 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, prevent criminal activity, and meet our legal and regulatory obligations.

We obtain this information via **Creditsafe**, which uses its data partner **TransUnion** to supply consumer credit and identity data.

- **Creditsafe Business Solutions Limited** is authorised and regulated by the Financial Conduct Authority
FCA Firm Reference Number: **742313**

- **TransUnion International UK Limited** is authorised and regulated by the Financial Conduct Authority
FCA Firm Reference Number: **805757**

The information we receive may include data relating to your identity, credit commitments, payment history, and public record information. This data is used solely for legitimate business purposes, including creditworthiness assessment, identity verification, and fraud prevention, in accordance with applicable data protection laws.

Further information about how Creditsafe and TransUnion process your personal data can be found in their respective privacy notices:

- **Creditsafe Privacy / Transparency Notice:**
[Transparency Notice | Customers & Suppliers](#)
- **TransUnion CRAIN (Credit Reference Agency Information Notice):**
[Credit Reference Agency Information Notice \(CRAIN\) | An Information & Insights Company](#)
- **TransUnion Bureau Privacy Notice:**
[TransUnion Bureau Privacy Notice | An Information & Insights Company](#)

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.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail on:

- Our website at grampiancreditunion.co.uk
- Equifax at [Credit Reference Agency Information Notice \(CRAIN\) | Equifax UK](#)
- Experian at [Credit Reference Agency Information Notice \(CRAIN\) | Experian](#)
- TransUnion at [TransUnion Bureau Privacy Notice | An Information & Insights Company](#)
[Credit Reference Agency Information Notice \(CRAIN\) | An Information & Insights Company](#)
- Creditsafe at [Transparency Notice | Customers & Suppliers](#)

Your Rights

Your rights under data protection regulations are:

- The right to access
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object to data processing
- Rights related to automating decision-making and profiling
- Right to withdraw consent

- The right to complain to the Information Commissioner's Office

Please see our website here:

Your rights explained

Right to Access

You have the right to access your personal data and details of the purposes of the 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 to you a copy of your personal data. You can access your personal data by visiting www.grampiancreditunion.co.uk

The right to rectification

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

The right to erasure

In some circumstances you have the right to the erasure of your personal data without 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 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; and
- 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 only otherwise process it:

- with your consent;
- for the establishment, exercise or defence of legal claims; or
- 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 situation, but only to the extent that the legal basis for the processing is that the data is necessary for the purposes of the legitimate interests pursued by us or by 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 make such an objection, we will cease to process your personal data for this purpose

The right to data portability

To the extent that the legal basis for our processing of your personal data is:

- consent; or
- 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 this data to another organisation. This right does not apply where it would adversely affect the rights and freedoms of others.

Rights related to automatic processing

This credit union uses non-automated decision-making and profiling process for processing members' loan applications to make sure that our decisions are quick, fair, efficient, and correct based on what we know.

We may use automated systems and tools to support certain business processes, such as risk assessment, fraud prevention, affordability checks, identity verification, or record management.

We may use a company called NestEgg Ltd to process this data on our behalf. NestEgg Ltd provides an automated 'decision' to help the Credit Union make it easy for members to apply for loans and savings accounts. NestEgg Ltd is not responsible for making decisions, they do not see your personal information. Their software makes a recommendation to a loans officer.

When you apply for a loan and / or savings account up to five searches may appear on your credit file. For the purposes of credit scoring, this will typically only affect your credit score as if one credit application were made.

Each of these five 'footprints' relate to the different sources of data being used to assess an application; these include the credit report itself and an affordability check. The Credit Union needs to prove the information belongs to you which is when an ID check is required. In cases where an application is made by a new member; the Credit Union will use an ID check and may also run a report to check ownership of any bank account details you may give us. These checks are required by law to prevent money laundering.

Some of these footprints will be in the name of NestEgg Ltd and others in the name of the Credit Union.

These tools may analyse personal data using predefined criteria or rules to generate indicators, scores, or recommendations. However, we do not make decisions that have a legal or similarly significant effect on individuals based solely on automated processing. Any such decisions are subject to meaningful human review.

The use of these tools may influence the speed or level of review applied to an application or request, but individuals will not be subject to automatic rejection or adverse decisions without human involvement.

The non-automated lending process looks at your credit score alongside information such as:

- the amount applied for
- your income and expenditure
- your history of repaying debts
- the number and value of County Court Judgements (CCJs) you have
- the number of accounts you have that are in default
- public information such as the insolvency service
- whether or not you are bankrupt
- your age

and decides based on either

- Set policies e.g. the credit union does not lend to those less than 18 years of age, or the credit union does not lend to people with over a certain value of county court judgements.
- The predicted likelihood of the repayment of the loan based on the statistical analysis of whether individuals who had a similar credit profile repaid their debts in the past.

Members have the right to have the decision reviewed by a member of staff, express their point of view, and obtain an explanation of the decision and challenge it.

Fraud Prevention Agencies

We use your information to carry out checks for the purposes of preventing fraud and money laundering. These checks require us to process and share personal data about you.

The personal data can include information that you have shared with us in making your loan application, other information we have collected or hold about you, or information we receive from third parties such as Credit Reference Agencies.

We will share your:

- name;
- address;
- date of birth;

- contact details;
- financial information;
- employment details;
- Device identifiers, including IP address; and
- Any other information that it is in our legitimate interest to share in order to prevent or detect fraud, or that we are legally obliged to provide.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

We process your data in these ways because we have a legitimate interest in preventing fraud and money laundering in order to protect our business and to comply with laws that apply to us.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, for up to six years.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the loan or any other services you have asked for. We may also stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by fraud prevention agencies and may result in others refusing to provide services, financing or employment to you. If you have any questions about this then please contact us.

Right to withdraw consent

To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

The right to complain to the Information Commissioner's Office

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

1. Going to their website at: <https://ico.org.uk>
2. Phone on 0303 123 1115
3. Post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
4. Email: scotland@ico.org.uk

Contact us about your rights

For more information about how your rights apply to your membership of the credit union or to make a request under your rights you can contact us admin@grampiancreditunion.co.uk or 01224 561506. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay.

Contact details of the credit union

Address: Grampian Credit Union, Amicable House, 250 Union Street, Aberdeen. AB10 1TN

Phone: 01224 561506

Email: admin@grampiancreditunion.co.uk

Changes to this privacy policy

We can update this Privacy Policy at any time and ideally you should check our website www.grampiancreditunion.co.uk 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 consent.