Privacy Policy

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 for your consent.

How we use your personal information

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

For legal obligations

- to confirm your identity
- to perform activity for the prevention of money laundering and financial crime
- to carry out internal and external auditing
- to record basic information about you on a register of members

For performance of our contract with you

- to deal with your account(s) or run any other services we provide you
- to consider any applications made by you
- to carry out credit checks and to obtain and provide credit references
- to undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business

For legitimate interests

- to conduct activity for the purposes of debt recovery With your consent
 - to inform you of products and services by direct marketing (unless you specifically object to this), or to conduct market research.

By joining the credit union you agree that we can send you statements, new terms and conditions, information about changes to the way your account(s) operate and notification of our annual general meeting.

Sharing your personal information

We will disclose information outside the credit union only:

- to third parties to help us confirm your identity to comply with anti-money laundering legislation
- to credit reference agencies and deb recovery agents who may check the information against other databases – private and public – to which they have access
- to any authorities if compelled to do so by law (e.g. 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 in order 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 the administration of marketing communications. (We will NEVER sell or share your information to other companies for marketing of products and services not provided by the credit union or in connection with your credit union account.)

Loan applications

As a responsible lender, Just Credit Union has a legal obligation to take steps to ensure that our customers are creditworthy.

We use a variety of methods to try to make sure that we do not lend money to people who are in financial difficulty. One of these is to carry out a credit reference check. In order to do this, we may pass the personal data that you provide to us in your loan application to a credit reference agency (CRA) called Perfect Data Solutions Limited which trades as Lending Metrics. Lending Metrics provide us with data about a customer's credit history and borrowing habits. You can contact Lending Metrics at Lancaster Court, 8 Barnes Wallis Road, Fareham, Hampshire PO15 5TU in writing to request the information that they hold about you. (Please note, a small statutory fee may be payable.)

Important – Your Personal Information

Credit decisions and also the prevention of fraud and money laundering We may use credit reference and fraud prevention agencies to help us make decisions. What we do and how both we and credit reference and fraud prevention agencies will use your information is detailed in the section called: A condensed guide to the use of your personal information by ourselves and at Credit Reference and Fraud Prevention Agencies. By confirming your agreement to proceed you are accepting that we may each use your information in this way.

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 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 & Customs which may transfer that information to tax authorities in countries where you or a connected person may be a 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 of time after you have left the credit union.

For a copy or our policy for retaining members' data please contact us at info@justcreditunion.org or 01743 252325.

Credit referencing agencies

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.

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

- Transunion at transunion.co.uk/crain
- Equifax at equifax.co.uk/crain
- Experian at experian.co.uk/crain.

They may retain information for up to 6 years after any credit agreement between us has ended. When we share this information all parties conform to industry standards. Credit Reference Agencies also share information about people with many financial organisations.

Their records can tell us:

- whether you have kept up with paying your bills, rent or mortgage, and other debts such as loans, phone and internet contracts;
- your previous addresses;
- information on any businesses you may own or have owned or directed;
- whether you are financially linked to another person, for example by having a joint account or shared credit;
- whether you have changed your name;
- whether you have been a victim of fraud.

Where you are financially linked to another person their records can provide us with details about that person's credit agreements and financial circumstances. They also use publicly available information to record information about people, including information from:

- The Royal Mail Postcode Finder and Address Finder;
- The Electoral Register;
- Companies House;
- The Accountant in Bankruptcy and other UK equivalents;
- The Insolvency Service and other UK equivalents;
- County Court Records.

This tells us, among other things:

- Your age, address and whereabouts;
- whether you are on the Electoral Register;
- whether you have been declared bankrupt;
- whether you are insolvent; and
- whether there are any County Court Judgements against you.

Credit Reference Agencies may also be Fraud Prevention Agencies.

We use this information to help us make sure we are lending our money responsibly and to help us decide whether a loan is appropriate for you. We cannot do this without:

- confirming your identity;
- verifying where you live;
- making sure what you have told us is accurate and true;

- checking whether you have overdue debts or other financial commitments; and
- confirming the number of your credit agreements and the balances outstanding together with your payment history.

We also have a duty to protect the Credit Union and the wider society against loss and crime, so we use and share Credit Reference Agency information:

- to identify, prevent and track fraud;
- to combat money laundering and other financial crime; and
- to help recover payment of unpaid debts.

We use information in this way to fulfil our contract to you, to meet our legal and regulatory responsibilities relating to responsible lending and financial crime, to protect the Credit Union from loss, to pursue our legitimate interests and to prevent crime.

Automated assessment

We may use automated decision making in processing your personal and financial information to make credit decisions.

It is our policy to manually review automated decisions whenever possible. However, you have the right to request a manual review of the accuracy of any decision we make if you are unhappy with it.

The Credit Union uses 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.

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.

Your Rights

Click here to find out about your Data Protection Rights

Security

We take the protection of your information very seriously and high security measures will be taken to ensure your data is protected. All online banking activity is protected by a secure certificate using the TLS1.2 standard encryption which provides an industry standard level of security.

Cookies

To provide you with a good online journey, we will store a number of cookies on your machine, to help us associate important information with you. For more information on cookies, please view our <u>cookie policy</u>.

External links

You may encounter links to external websites when using our website, this policy does not cover these websites and we encourage you to view each website's privacy policy before submitting any information.

Contact us

If you want more information on how we use and hold your data, or if you think we may be holding incorrect information, please get in touch on the details below and we will happily review the information we store. We will keep all the records we have on you unless you tell us otherwise.

If you would like to request a copy of all the personal details we are holding on you then please get in touch on the details below.

If you no longer wish us to hold your personal data, please contact us on the details below. Please note that we may not be able to provide you with our services without access to your data.

- By email to info@justcreditunion.org
- By telephone on 01743 252325
- In writing to Just Credit Union, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND