

Watford Credit Union's Privacy Policy

We are committed to protecting our members' privacy. The credit union needs the information marked on our application form(s) as REQUIRED, either to 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

Watford 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 to you;
- to consider any applications made by you;
- 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 & 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 debt 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. 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 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
- to 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)

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 than 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 of time after you have left the credit union. Please see the Appendix for the details.

Your Rights

Your rights under data protection regulations are:

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

Your rights explained

Right to Access

You have the right to access your personal data (i.e. information) 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.

The 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 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 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 particular 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:

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

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. Phoning them on 0303 123 1113
3. Writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

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 on the details below. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay.

- **In person at** – 59 Clarendon Road, Watford WD17 1LA
- **By email to** – info@watfordcreditunion.co.uk
- **By telephone on** – 01923 236401
- **In writing to** – Watford Credit Union, 59 Clarendon Road, Watford WD17 1LA

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.

Changes to this privacy policy

We can update this Privacy Policy at any time. 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.

Appendix: Watford Credit Union Retention Policy

Record	Required by	Retention Period
Membership Records		
Register of Members	Industrial & Provident Society Act (IPSA)	Permanently
Rules and Amendments (as registered with the Financial Conduct Authority)	Industrial & Provident Society Act (IPSA)	Permanently
Receipts for any securities held, securities register and register of contracts of guarantee	Industrial & Provident Society Act (IPSA)	Permanently
Minutes of annual and special general meetings and the meetings of the Board of Directors	Industrial & Provident Society Act (IPSA)	Permanently
Members' share and loan Register	Industrial & Provident Society Act (IPSA)	Permanently
Copies of Annual Returns	Regulator	Permanently
Register of bad debts written off	Regulator	Permanently
Anti Money Laundering		
Evidence of identity	Anti Money Laundering	5 years after member leaves
Member transactions	Anti Money Laundering	5 years after member leaves
Reports of suspicious transactions (internal and external)	Anti Money Laundering	5 years after individual leaves
AML training provision	Anti Money Laundering	5 years after member or volunteer leaves
Accounting records		
All records appertaining to the accounts of the credit union including: • Receipts and invoices. • Ledgers and cash books (whether manual or electronic) • Payroll Information • VAT books and copies of returns • Corporation tax records	HMRC	6 years after the date to which they refer
Loan applications - approved	Recommended Limitations Act 1980	6 years after loan is repaid
Loan applications - declined	No clear guidelines	6 years after application
Loan agreements	No clear guidelines	6 years after loan is repaid
Collection sheets	No clear guidelines	6 years after the date to which they refer
Money-in Money-out forms	No clear guidelines	6 years after the date to which they refer
Personnel		
Employer's Liability Certificate	HSW	40 years
Application forms/interview notes for unsuccessful candidates	Guideline retention period in case of discrimination challenge (www.acas.org.uk)	1 year
Disciplinary, working time and training, redundancy details	Recommended (www.businesslink.gov.uk)	10 years after agreement ceases
Volunteer records	No clear guidelines but the credit union should follow data protection requirement that data should not be kept longer than for the purpose for which it was taken	
Supervisory & Audit		
Supervisory committee audit records and reports	No clear guidelines	6 years
Health & Safety		
Accident Reports	HSW Act	3 years after date of last entry
Health & Safety Consultations	HSW Act	Permanently
Records that may be routinely destroyed		
Notices and acknowledgements of meetings and events. Messages on post-it notes and paper, message slips, duplicate documents such as CC and FYI copies, unaltered drafts, working papers not required to retain together with final official document, reference materials no longer required, superseded address lists or contribution lists	N/A	N/A