Templemore Credit Union Ltd

Privacy Notice for Beneficial Owners of Credit Union

Version 2
18/02/2025

Credit Union Contact Details	
Address	Main Street
	Templemore
	Co Tipperary
Phone	0504 31603
Email	

Data Protection Contact Details	
Name/Title	Michael Fogarty
Phone	0504 31603
Email	info@templemorecu.ie

Templemore Credit Union Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us.
This Privacy Notice is to provide you with information regarding the processing of information about you in relation to the credit union's obligations to comply with S.I. No. 110/2019 - European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019. Under this statutory instrument certain categories of your personal data are required to be processed.

Relevant Data Subjects

For the purposes of this privacy notice, the relevant data subjects are:

- the directors of the credit union; and
- the credit union chief executive officer

Purpose of Data Collection, Processing or Use
In certain instances, owing to legal obligations, Templemore Credit Union is obliged to process your personal data. In relation to the subject matter of this privacy notice, the credit union is required to process your personal data in order to comply with S.I. No. 110/2019 - European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019. This statutory instrument requires the credit union to maintain an internal register of beneficial owners. This is an anti-money laundering measure and is designed to aid the Companies Registration Office's (the CRO) obligation to create a national, central register of beneficial ownership. Towards this aim, and within agreed timescales, the credit union will be required to share your personal data with the CRO.

What personal data do we use?
We are obliged to collect, store, and process the following categories of personal information about you:

- Name;
- Date of Birth;
- Nationality;
- Residential Address;
- PPSN;
- Statement of the nature and extent of interest held by that beneficial owner i.e. the position held by the person in the credit union;
- Date on which the person was entered in the Register; and
- Date on which the person ceases to be a beneficial owner.

We need all the categories of information on the above list above to comply with our legal obligations.

Why we process your personal data in this way

- To comply with our legal obligations including ISBAR , specifically to collect, retain and forward your personal data to the Companies Registration Office for the creation of a central register of beneficial interests.

How we use particularly sensitive personal data
"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal data in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. Where it is needed in the public interest, and in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

How secure is my information with third-party service providers?
All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be controllers in their own right. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations and a written data processing agreement.

If you fail to provide personal information
If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations.

Change of purpose
You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Data Retention Periods
We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal obligation to keep it. Where possible we record how long we will keep your data. Where that is not possible, we will explain the criteria for the retention period. This information is documented in our Retention Policy. Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- Under anti-money laundering legislation, in particular, the Criminal Justice (Money Laundering & Terrorist Financing) Act 2010, records kept for the purposes of anti-money laundering must be retained for five years after the relevant relationship ends.

Planned data transmission to third countries
There are no plans for a data transmission to third countries. A third country, for data protection purposes, is a country that is outside of the European Economic Area and, so, is not subject to EU law. If the credit union were to transfer any data outside of the European Economic Area, it would only do so with all appropriate legal controls in place.

Updates to this notice
We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products. You can always find an up-to-date version of this notice on our website at **www.templemorecu.ie** or you can ask us for a hard copy.

Our use and sharing of your information
We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use this information for the following purposes:

<table>
<tr><td> </td><td>Legal Obligation
This basis is appropriate when we are processing personal data to comply with an Irish or EU Law.</td></tr>
<tr><td colspan="2">Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes.</td></tr>
<tr><td colspan="2">Compliance with S.I. No. 110/2019 - European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019. In order to comply with the obligation to create and maintain an internal register of beneficial ownership, the credit union is obliged to share your personal data with the Companies Registration Office. This is in order to facilitate the creation of a national central register of beneficial ownership.</td></tr>
<tr><td colspan="2">Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external auditor. We will allow the external auditor to see our records (which may include information about you) for these purposes. In addition, we appoint an internal auditor who may also view your records.</td></tr>
</table>

Your Rights The following are your rights in connection with your personal data.	
	To find out whether we hold any of your personal data, **and if we do, to request access** to a copy of that data. You are also entitled to request further information about the processing.
	Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
	Request erasure of your personal information. This enables you to ask us to delete or remove personal data where there is no lawful basis for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
	Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party). Please note that this is a right to object, but if the credit union can successfully establish the necessity and proportionality of its processing, then your request may not be met.
	Request the restriction of processing of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances.
	Where we are processing your data based solely on your consent **you have a right to withdraw that consent at any time and free of charge**.
	Request that we: a) **provide you with a copy of any relevant personal data in a reusable format**; or b) **request that we transfer your relevant personal data to another controller** where it's technically feasible to do so. *Relevant personal data* is personal data that: You have provided to us or which is generated by your use of our service, which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.

You have a **right to complain** to the **Data Protection Commissioner** in respect of any processing of your data at		
Post Data Protection Commissioner Canal House Station Road Portarlington R32 AP23 Co. Laois	**Telephone** +353 (0)57 868 4800 +353 (0)761 104 800 1890 252 231	**E-mail** info@dataprotection.ie

Please note that the above rights are not absolute and, depending on the circumstances, there may be some limitations.

If you want access and/ or copies of any of your personal data or if you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we send you or a third party a copy your relevant personal data in a reusable format please contact our Data Protection Officer in writing using their contact details above.

There is no fee in exercising any of your above rights, unless your request for access is clearly unfounded or excessive. We also reserve the right to refuse to comply with the request in such circumstances.

We may need to verify your identity if we have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Ensuring our information is up to date and accurate. We want the service provided by us to meet your expectations at all times. Please help us by telling us without undue delay if there are any changes to your personal information.