

Privacy Notice

1. Introduction

We - Hastings & Rother Credit Union Ltd - are committed to protecting our members' privacy. The Credit Union is required to obtain and keep certain information about you either to meet our 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 that is not required for these reasons, we will ask you for your consent.

2. How we obtain personal information

We obtain personal information:

- directly from you, for example when you fill out an application to join the Credit Union;
- by observing how you use our services, for example from the operation of your accounts and the payment history on your loans, as well as your communications with us such as telephone calls, emails, SMS and social media;
- from other organisations such as fraud prevention agencies, employers, housing providers, tracing agencies, solicitors and debt recovery agencies.

3. How we use your personal information

Hastings & Rother Credit Union Ltd may process, transfer and/or share your personal information in the following ways:

To meet our legal obligations

- confirm your identity;
- perform activity for the prevention of financial crime;
- carry out internal and external auditing; and
- record basic information about you on our register of members.

To perform our contract with you

- operate you account(s) or run any other services we provide to you (including the provision of statements, new terms & conditions, information about changes to the way your account(s) operate, information about the Credit Union and your membership rights and notification of our annual general meeting);
- consider any applications made by you and make and administer any loans;
- undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business.

Based on our legitimate interests

We may occasionally share your information with third parties where you have authorised us to do so. Special protection is given to certain kinds of personal information that is particularly sensitive. We do not routinely collect or process data of this kind. We will only use this kind of personal information where:

- we have a legal obligation to do so;
- it is necessary for us to do so to protect your vital interests;
- it is necessary for the prevention or detection of crime;

- it is necessary for insurance purposes; or
- you have specifically given us explicit consent to use the information.

4. 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 money laundering legislation;
- to debt recovery agents who may check the information against other databases – private and public – to which they have access;
- to any authorities if required 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 organisations who provide a service or benefits to you, in some cases pursuant to data sharing agreements that we have entered into with those persons. These may include, but are not limited to, insurers, your Council or your housing provider, your employer and Contis Financial Services Ltd. (who provide Engage accounts);
- to our suppliers in order for them to provide services to us and/or to you on our behalf, for example third parties who help us to recover debts, audit our accounts or carry out statistical analysis;
- to your nominated beneficiary where necessary to perform our contract with you; and
- to anyone in connection with a reorganisation or merger of the credit union's business.

5. Where we send your personal 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.

6. 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, but we will not hold your information for longer than is necessary as detailed in the document "Retaining and Archiving Records" on our website <http://www.hrcu.org.uk/RegulatoryInformation.html>

7. 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 object to data processing
- f) The right to data portability
- g) Rights related to automated decision-making
- h) The right to withdraw consent
- i) The right to complain to the Information Commissioner's Office

These rights are explained in more detail below.

The right to access

You have the right to access a copy of your personal data along with information on what personal information we use, why we use it, who we share it with and how long we keep it for. You can make a request for access free of charge by contacting us. Please make all requests for access in writing, and provide us with evidence of your identity.

The right to rectification

You have the right to instruct us to promptly correct any inaccurate personal data about you and, where appropriate, 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 allow us to process the information;
- the processing is for marketing purposes; or
- the personal data was unlawfully processed.

However, we will 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; or
- you have objected to processing based on our legitimate interests, pending the verification of that objection.

In practice, we do not expect that this right will be relevant to our members, given the nature of our activities. Members will instead be protected by their rights to rectification and erasure and to object to direct marketing. However, where you are entitled to restrict processing on any of the four grounds set out above, we may continue to store your personal data, but 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.

You therefore 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. We do not otherwise process data based on our legitimate interests.

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 where this is technically feasible. This right does not apply where it would adversely affect the rights and freedoms of others.

The 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 1113
3. Post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

8. 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 as below. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay. Our contact details are:

Hastings & Rother Credit Union Ltd, Jackson Hall, Prospect Place, Hastings TN34 1QN

Phone: 01424 202651; email: info@hrcu.org.uk; web: www.hrcu.org.uk

9. Changes to this privacy policy

We can update this Privacy Policy at any time and ideally you should check it regularly at <http://www.hrcu.org.uk/RegulatoryInformation.html> 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.

Hastings & Rother Credit Union Ltd is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority – Reference 213644. It is a member of the Financial Ombudsman Service and member deposits are covered by the Financial Services Compensation Scheme.