

INTRODUCTION

CUFA Ltd. is committed to protecting the privacy of your personal data and the personal data of all other individuals that we receive in the course of doing business with our credit union clients and other firms.

This personal data includes information relating to credit union employees and other personnel who have been set up by their credit union as authorised users of CUFA's online services on behalf of their credit union.

CUFA has this personal information because you or your credit union has provided us with your company email address (required to access the CUFA software) and other contact information for CUFA to use to support its client credit unions and your use of the CUFA system and other services.

CUFA takes its responsibility regarding the security of your personal information very seriously, and we will be clear and transparent about the information we are collecting and what we will do with that information.

This Privacy Notice sets out the following:

- What personal data we collect and process about you in connection with our online and other services;
- Where we obtain the data, what we do with that data, and how we store the data;
- Who we may transfer/disclose that data to;
- How we deal with your data protection rights and how we comply with data protection legal requirements.

All personal data is collected and processed by us in accordance with the EU General Data Protection Regulation and with applicable Irish data protection laws and regulations. CUFA is the "data processor" of any personal information that is collected and used by CUFA regarding you and the other individuals described above.

CUFA is registered in Ireland with company number 529554, and its registered offices are at 2nd Floor Bloodstone Building, Sir John Rogerson's Quay, Dublin 2, Co. Dublin, Ireland.

WHAT PERSONAL INFORMATION WE COLLECT

The only personal data we will collect and maintain relating to you will be your name, employer, job title, business email address, and your business phone and/or mobile number(s). We will also maintain usage and access logs and similar information automatically collected by our online system that record your use of the CUFA software on behalf of your credit union.

We may receive personal information directly from you by means of your use of our online system or by means of an authorised representative of your credit union setting you up online as a user or otherwise. We may also obtain personal data from you by your contacting us directly by email, post, telephone or otherwise.

WHAT YOUR PERSONAL INFORMATION IS USED FOR

We will only process your personal data where we have a legal basis to do so

pursuant to our contractual relationship with your credit union. That legal basis will be for:

- a. Enabling you to use our online services as an authorised user of the CUFA software and for related purposes, for which your credit union email address is required for logging in and obtaining access;
- b. Informing you regarding our online services, including, for example, notification of software changes, instructions for usage, notice of interruptions to service, availability of training and information meetings, and other technical, administrative and training information related to your use of our online services, as well as for any other dealings you might have with CUFA.
- c. Meeting our legal and contractual obligations to your credit union as our customer;
- d. Customer communications to manage our relationship with you and your credit union to support and improve our services and your experience with us;
- e. Communications to you as a member of the CUFA Users Group; and
- f. Enabling you to interact with other CUFA users for purposes related to your use of the CUFA system, such as for training, information and experience sharing and for professional networking.

STORAGE AND RETENTION OF DATA

We follow strict security procedures to physically maintain your personal data in Ireland and for the storage and use of your personal data and to protect it against accidental loss, destruction or damage.

We will not retain your data for longer than is necessary to fulfill the purposes for which it is being used by us and to meet our legal and contractual obligations. When we no longer need your personal data, we will securely erase or destroy it.

SHARING OF DATA

Your personal data may be shared within CUFA Ltd. and for legitimate business purposes with our advisors and others who have enforceable confidentiality agreements with us, with your credit union or other employer, and with the other users of our online services, including other members of the CUFA Users Group. We may also share your personal data with government authorities, law enforcement bodies and others but only as may be required by law.

We will never sell or otherwise transfer your personal data to third parties or use it or allow it to be used for any sales or direct marketing purposes. We will not use your personal data for automated decision-making, such as profiling, with the sole exception of monitoring your use of the CUFA system for data security purposes and to analyse and improve yours and your credit union's experience with our software.

YOUR DATA PROTECTION RIGHTS

Under certain circumstances, by law you have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding/using it.
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about

you corrected.

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request that we not share your email address** or other personal information with other users and with members of the CUFA Users Group.
- **Request transfer** of your personal information in an electronic and structured form to you or to another party (commonly known as a right to “data portability”). This enables you to take your data from us in an electronically useable format and to be able to transfer your data to another party in an electronically useable format.
- **Withdraw consent.** If you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we have another legitimate basis for doing so.

If you want to exercise any of these rights, then please contact us by post at our registered address shown above or by email to support@cufa.ie, in both cases marked “Attention: CUFA Data Protection.”

In the event of such a request, we may need to require specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

CHANGES TO OUR PRIVACY POLICIES

Our privacy policies may change from time to time and any changes to this Privacy Notice will be communicated to you by way of an e-mail or a notice on the website you use to access our online services.