



## Employee Data Privacy Notice

This Data Privacy Notice is effective as and from 25 May 2018

The purpose of this privacy notice is to explain how Core Credit Union (the “Credit Union”, “we”, “us” and “our”) may process your personal information.

### 1. Introduction

We are committed to protecting your privacy. This Privacy Notice set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We reserve the right to amend this Privacy Notice from time to time without prior notice. However, we will bring any material amendments to your attention and amendments will not be made retrospectively.

We will always comply with the General Data Protection Regulation ("GDPR") when dealing with your personal data. Further details on the GDPR can be found at Office of the Data Protection Commissioner's dedicated GDPR website ([gdprandyou.ie](http://gdprandyou.ie))

For the purposes of the GDPR, we will be the “controller” of all personal data which we hold about you.

### 2. Why do we collect and use your personal information?

As your employer, the Credit Union needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for management and administrative uses only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract (e.g. to pay your salary), to comply with any legal requirements (e.g. to make tax returns) and to pursue the legitimate interests of the Credit Union (e.g. to prevent and detect crime).

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

### 3. What personal information do we collect about you?

The sort of information we hold includes:

- your application form and references;
- your contract of employment and any amendments to it;

- correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary;
- information needed for payroll, benefits and expenses purposes;
- contact and emergency contact details;
- records of holiday, sickness and other absence;
- information needed for equal opportunities monitoring policy;
- fitness and probity due diligence records;
- closed-circuit television may be used in and around our premises for the purposes of security and preventing crime – therefore we may have images of you captured by our CCTV cameras;
- we monitor computer [and telephone/mobile telephone] use, as detailed in our Computer/telephone/electronic communications policy;
- we keep records of your hours of work by way of our clocking on and off system; and
- records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage sick pay and any benefits e.g. health insurance or life insurance policies.

#### **4. How is the personal information collected?**

We collect personal information from a number of sources, including information we receive directly from you and information we obtain from third parties such as referees.

#### **5. Who do we share your personal information with?**

We may share your personal information with third parties in order to comply with our contractual duties to you. For example, we may need to pass on certain information to our pension or insurance schemes.

We sometimes share your personal information with trusted third parties who perform important functions for us based on our instructions and applying appropriate confidentiality and security measures. For example, we may share your personal information with the following third parties:

- (a) our legal and professional advisers such as auditors and external legal counsel;
- (b) trade / representative bodies; and
- (c) any sub-contractors, agents or service providers engaged by the Credit Union (including their employees, directors and officers), such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions.

We may also share your personal information with any third parties to whom you have instructed us to share your information with.

We are required to cooperate by law or otherwise through a legal process with Irish and EU regulatory and enforcement bodies such as the Central Bank of Ireland, an Garda Síochána, the courts, fraud prevention agencies or other bodies.

We may disclose personal information relating to our employees to any third party in the event of a transfer or merger (or potential transfer or merger) of the Credit Union.

The people and organisations that we may share your personal information with may be located in a country that does not have data protection laws which provide the same level of protection as the laws in Ireland. Some countries already have adequate protection for personal information under their applicable laws. In other countries safeguards will be applied to maintain the same level of protection as the country in which the products and services are supplied. These safeguards may be contractual agreements with the overseas recipient or it may require the recipient to subscribe to international data protection frameworks. For more information about the European Commission's decisions on the adequacy of the protection of personal information in countries outside the EEA, please visit: [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)

## **6. Updates to your personal information**

If any of the personal information you have given to us should change, such as your contact details, please inform us without delay. Similarly, if we have collected personal information about you that you consider to be inaccurate, please inform us. Our contact details are below.

## **7. How long do we keep your personal information?**

We need to keep your personal information for as long as necessary to fulfil the purposes for which it was collected (as described above). Even after your employment with the Credit Union ends, we must retain some of your personal information in order to comply with legal and regulatory requirements and in case of claims. The criteria we use to determine data retention periods for your personal information include the following:

- We will retain some of it in case of queries from you (for instance, if you submit a request for a reference);

- We will retain some of it for the period in which you might legally bring claims against us; and
- Retention in accordance with legal and regulatory requirements. We will retain some of it after our employment contract with you has come to an end, based on our legal and regulatory requirements.

## **8. Your rights under data protection laws**

Your rights are as follows (noting that these rights do not apply in all circumstances):

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the right to be forgotten);
- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information (data portability).

In addition, you have the right to complain to the Office of the Data Protection Commissioner which has enforcement powers and can investigate compliance with data protection laws.

If you wish to exercise any of these rights you can contact us using the details below.

## **9. How to contact us**

If you have any questions about this privacy notice or your personal information, please contact [dpa@corecu.ie](mailto:dpa@corecu.ie).

## **10. Updates**

This Privacy Notice may be updated from time to time and the current version of this Privacy Notice shall be retained on the member services drive.