

# Privacy Notice of Naomh Breandáin Credit Union Limited

## Recruitment

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members. Data collection, processing and use are conducted solely for the purpose of carrying out the abovementioned objectives.

Our contact details are:

Address: **Dunkellin Street, Loughrea, Co. Galway**

Phone: **091 841773**

Email **DPL@naomhbrendancu.ie**

\*Data Protection Lead

Contact: **DPL@naomhbrendancu.ie**

Naomh Breandáin Credit Union is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal data about you during and after the recruitment and selection process for a position with us.

This privacy notice is for distribution amongst all potential applicants to the credit union including employees, contractors, agency workers, consultants, directors, officer and volunteers (Credit Union Personnel) of the credit union. There may be elements of the notice that are not applicable to you according to the specific role you undertake within the credit union.

### We may collect the following information:

- The information you have provided to us in your [application form/curriculum vitae and covering letter];
- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- PPS number;
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Any information you provide to us by email, telephone or during an interview;
- Details of your referees.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- ~~[Information about your race or ethnicity]~~
- [Information about your health, including any medical condition, health and sickness records.]
- [Information about criminal convictions and offences.]

We may also collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;

- **[Where applicable]** Information regarding your criminal record, in criminal records checks and credit history and any other data revealed during background screenings;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;<sup>1</sup>
- A copy of your driving licence (If relevant to the position you are applying for);

### How we collect the information

We collect personal data about candidates from the following sources:

- Data which you (the candidate) submits in resumes/CVs , letters, or other written material;
- Recruitment agency, third party placement firms or job search websites from which we collect the following categories of data:
  - The information you have provided to us in your [application form/curriculum vitae and covering letter];
  - Your name and contact details (i.e. address, home and mobile phone numbers, email address);
  - PPS number;
  - Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- Recruit Safe background check provider, from which we collect the following categories of data: Judgements & Directorship Checks / Qualifications Validation / Professional Body membership & Regulatory Check.
- Your named referees, from whom we collect the following categories of data: your previous academic and/or employment history, including details of any conduct or performance issues, appraisals, time and attendance,

### Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:



**Fulfilling contract** We need to process your personal information to decide whether to enter into a contract of employment with you

[Assess your skills, qualifications, and suitability for the position] [To take steps to enter into a contract with you.]



**Our legal duty** This basis is appropriate when we are processing personal data to comply with EU or Irish Law

for compliance with a legal obligation (e.g. [Keep records related to our hiring processes.]; our obligation to check that you are eligible to work in the Republic of Ireland); [to undertake relevant criminal record checks as required by our regulatory and as permitted by law for specific functions/roles only]



**Legitimate interests** A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

[Assess your skills, qualifications, and suitability for the position]

Our legitimate interest: It is in the legitimate interests of the credit union to recruit individuals to roles and functions for its benefit.

<sup>1</sup> Candidates are required (by law or in order to enter into your contract of employment) to provide this information to us to enable us to verify your right to work and suitability for the position.

[Communicate with you about the recruitment process.];

[Our legitimate interest: To ensure we keep you updated on the process, we will contact you via your preferred method of communication, to ensure that correct instructions were given or taken due to the nature of our business and to quickly and accurately resolve any disputes.]

[Keep records related to our hiring processes.];

[Our legitimate interest: To keep records related to the hiring process in case you wish to exercise any rights relating to the data and quickly and accurately resolve any disputes.

[If we wish to retain your personal data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal data for a fixed period on that basis.]

Having received your CV and covering letter OR your application form we will then process that information to decide whether you meet the necessary requirements to be shortlisted for the role. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position, we will then take up references and carry out a criminal record and carry out other checks before confirming your appointment.

In general, access to your personal data will be restricted to minimise the number of people in the credit union who need it in order to evaluate your application for employment, provide functions supporting our Recruiting and selection team e.g. external interviewers, or to whom we are compelled to provide it by applicable law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

### **How we use special category data**

We will use your special category data in the following ways:

- We will use information about your race or national or ethnic origin to establish if we require a work permit for you to be eligible to work for us;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation

### **Information about criminal convictions**

We will process information about criminal convictions in respect of the following roles only:

- We are required by the Central Bank Of Ireland to carry out criminal record checks for those carrying out any work involving cash handling, any work involving handling personal data applicable to the work of the credit union, or working with young persons and/or vulnerable adults

We are required to carry out a criminal records check in order to satisfy ourselves that there is

nothing in your criminal convictions history which makes you unsuitable for the role(s).

Where we do process criminal data we will ensure that appropriate additional safeguards as required by the Data Protection Act 2018 are in place.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How secure is my information with third-party service providers?**

We may also need to share some of the above categories of personal data with other parties, such as HR consultants, the Irish League of Credit Unions (ILCU)<sup>2</sup>, insurers and professional advisers. Usually, information will be anonymised but this may not always be possible. 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 data controllers in their own right<sup>3</sup>. 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. We may also be required to share some personal data with our regulators, the Central Bank of Ireland or as required to comply with the law.

### **Data Retention Periods**

We will retain your personal data for a period of 12 months after we have communicated to you our decision about whether to appoint you to the position. We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. Once the retention period has expired, the respective data will be permanently deleted. If you require further information, please contact us. Please see our Data Retention Policy

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. Information collected by us upon when employed by us is set out in our data protection privacy notice for Credit Union Personnel (which will be made available should you be successful).

**If we wish to retain your personal data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your consent to retain your personal data for a fixed period on that basis.**

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<sup>2</sup> The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as HR to affiliated credit unions. We may disclose information in your application to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

<sup>3</sup> As a data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.

## Your Rights in connection with your personal data are to:



**To find out** whether we hold any of your personal data and **if we do to request access** to that data that to be furnished 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 data. This enables you to ask us to delete or remove personal data 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 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) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.



**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 (DPC)** in respect of any processing of your data by:

<b>Telephone +353 57 8684800 +353 (0)761 104 800</b> <b>Lo Call Number 1890 252 231</b> <b>Web Form: <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a></b>	<b>Postal Address: Data Protection Commissioner</b> <b>21 Fitzwilliam Square South, Dublin 2, D02 RD28</b> <b>Ireland</b>
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**Please note that the above rights are not always absolute and 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 a copy/a third party a copy your relevant personal data in a reusable format please contact Data Protection lead in writing using their contact details above.

**There is no fee in using any of your above rights**, unless your request for access is clearly unfounded or excessive. Alternatively, we may 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 straightaway if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us at 091 841773.

**Document Version Control**

All amendments to this Recruitment Privacy Notice are denoted in red font. The table below summarises the amendments, corresponding rationale and page number in the privacy notice

<b>Version</b>	<b>Amendment/Modification</b>	<b>Rationale</b>
Version 1.1 June 2018	Removal of reference to 'job'  <i>This privacy notice is for distribution amongst all potential <del>job</del> applicants to the credit union including employees, contractors, agency workers, consultants, directors, officer and volunteers (Credit Union Personnel) of the credit union. There may be elements of the notice that are not applicable to you according to the specific role you undertake within the credit union.</i>	Remove any potential ambiguity as regards employment rights of volunteers.
Version 1.2 August 2021	Insertion of information relating to transfers outside the EEA/EU as a result of Brexit  Updating of the DPC Contact Details	To reflect changes brought in by Brexit  To reflect changes in how to contact the DPC