

Privacy Statement for Online Media & Mobile Banking

It is the policy of St. Patrick's Credit Union (ESB staff) Ltd (SPCU) to comply with the Data Protection Acts, 1988 and 2003.

The purpose of this Privacy Statement is to outline how SPCU deals with any personal data you provide to us while visiting our website, our mobile banking application (Mobile App) or when interacting with us via social media e.g. our Facebook page.

When you visit our website, our Mobile App or social media sites, you are accepting the terms of this Privacy Statement.

Types of information collected

SPCU retain two types of information from our members who access our website, Mobile App or social media sites:

1. "Personal Data": This is data that identifies you or can be used to identify or contact you and may include your name, postal address, email address, telephone number and birth date. The information you provide will be used for the purposes for which it was intended/submitted and as set out in this Privacy Statement.

2. "Non-Personal Data": Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding browser types, mobile device equipment, mobile network and other anonymous statistical data involving the use of our website, Mobile App or our social media sites. SPCU collects this information to help us monitor online traffic and manage the performance, efficiency and capacity etc. of our website, Mobile App or social media sites.

Purposes for which we hold your Information

(i) Use of Non-Personal Data

SPCU use the Non-Personal Data gathered from visitors to our website, Mobile App or social media sites in an aggregate form to understand the demographics of the users of our website, to help us better design and organize our website, Mobile App and social media sites.

If you are accessing our social media sites, please note that social media providers such as Facebook may also use data analytics tools which are governed by their own procedures. We have no control or responsibility over social media providers and their use of data.

(ii) Web Browsing

When accessing our website, SPCU may collect your IP address to assist with the gathering and analyzing of Non-Personal Data. No other personal data is disclosed by you or collected by SPCU when accessing our website. Generally, all that SPCU may know about your visit may be limited to technical data. This technical data shall be used for administrative and statistical purposes and may be shared with our internet service provider. SPCU will use this information to help us to improve our website.

(iii) Mobile Browsing

In order to download and use our Mobile App, you are required to register and activate the service. We will process your personal data during this registration and activation stage and we will transmit an activate code to the mobile number or email address provided by you for this purpose.

(iv) Social Media

If you choose to access our social media sites, your social media profile may also be made available to us. The actual personal information made available is determined by the privacy settings on your social media profile.

(v) Personal Data

SPCU will process any Personal Data you provide to us through our website, Mobile App and social media sites for the following purposes:

- (a) to provide you with information about the services of SPCU in respect of which you have enquired;
- (b) to enable you to access your accounts online where SPCU has agreed to give you access to our Online Banking Service;
- (c) to contact you if required in connection with your account or enquiry or to respond to any communications you might send to us;
- (d) to help us improve our services and systems; and
- (e) as otherwise notified to you at the time you provide the information to us.

Disclosure of Information to Third Parties

SPCU may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of our website, Mobile App and social media sites. For example, SPCU may inform third parties regarding the number of unique visitors to SPCU's website, the use of our social media sites or our Mobile App, the demographic breakdown of our users of our website or Mobile App, or the activities that visitors to our website, Mobile App and social media sites in while online. The third parties to whom SPCU may provide this information may include our website design, development, support and hosting contractors.

SPCU will not disclose your Personal Data to any third party unless you have consented to this disclosure or unless the disclosure is required in order to process an application or other communication from you or to perform the services you have applied for or to efficiently manage your account. SPCU will however disclose your Personal Data if SPCU believe in good faith that SPCU are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other valid legal process, including protecting and defending SPCU's rights and property.

Your Right of Access

Where you have provided us with your personal data you have a right to be given a copy of your personal data in accordance with section 4 of the Data Protection Acts subject to certain exceptions. To request a copy of your personal data please send a written request to The Data Protection Officer, St. Patrick's Credit Union (ESB Staff) Ltd., 27/28 Herbert Place, Dublin 2 together with the prescribed fee of €6.35. Please note the following important points:

1. we reserve the right not to process an access request which does not contain sufficient detail to enable us to comply with our obligations. We will however notify you of any decision not to process a request for these reasons.

2. we shall not process an access request unless the prescribed fee of €6.35 is received by cheque or postal money order made payable to St. Patrick's Credit Union (ESB Staff) Ltd.; and

3. we are only obliged to process access requests received in writing and do not accept access requests via telephone or text message.

Your Right of rectification or deletion of Personal Data

If SPCU hold incorrect information about you, you have the right to have the data amended. Further you have the right to have any information you have sent to us erased if we have failed to comply with our obligations under the Data Protection Acts. To request your right to rectification and/or erasure please send your request to us in writing at The Data Protection Officer, St. Patrick's Credit Union (ESB Staff) Ltd., 27/28 Herbert Place, Dublin 2 together with:

1. Your name and address.
2. A description of the specific personal data you wish rectified.

If you request an erasure of your personal data, all your data will be erased subject to the following important notice.

SPCU are not required to rectify or erase your data where to do so would prevent you from meeting your contractual obligations to us or where, notwithstanding your request, SPCU are required or permitted to process (including retaining) your personal data for a lawful purpose in accordance with the Data Protection Acts or other laws.

You agree that you will notify us of any relevant change in your personal circumstances to enable us to comply with our obligations to keep your information up to date.

If you feel that personal information or other damaging content has been posted about you on our social media sites, you should contact us using the contact facility on the relevant social network pages.

Internet Fraud

SPCU would always advise you to be cautious as regards disclosing your personal details. In particular, you should note that we will only ever request your personal details if: (i) you are seeking to initiate e-mail contact with us via our website, Mobile App and social media sites; or (ii) you initiate a request for a particular service via our website, Mobile App and social media sites and we require certain of your personal details to provide you with the requested service. You should never publish your account details or other private information using a social media channel.

Hyperlinks and Social Media Sites

Some of the pages on our website, Mobile App and social media sites contain hypertext links to websites not maintained by SPCU. You are reminded that different terms and conditions of use will apply to you as a user of such websites. In addition, such websites may not attain the same privacy standards that SPCU maintains. Similarly, you should familiarize yourself with social media providers' privacy policies (such as Facebook's) before using them.

Changes to the Privacy Statement

Any changes to this Privacy Statement will be posted on our website, Mobile App log-in page and on our social media sites.

Cookies

SPCU uses "cookie" technology. SPCU will also use cookies to facilitate your use of our website, Mobile App and social media sites, where SPCU has agreed to give you access to that service.

What are Cookies?

Cookies are small pieces of information, stored in simple text files, placed on your computer by a website. Cookies can be read by the website on your subsequent visits so that you can access information in a faster and more efficient way. The information stored in a cookie may relate to your browsing habits on the web page, or a unique identification number so that the website can "remember" you on your return visit. Generally speaking, cookies do not contain personal information from which you can be identified, unless you have separately furnished such information to the website.

You can at any time set your browser or your mobile device settings to reject cookies. However, if you reject our session cookies, this may affect your ability to use our website, Mobile App and social media sites.

For more information on how to manage cookies, including how to disable cookies please visit: www.aboutcookies.org.

SPCU uses three different types of cookies: "session" cookies, "performance" cookies and "targeting" cookies.

Session Cookies

"Session" cookies help users to navigate across our website, Mobile App and social media sites. They are deleted once you leave our website. Session cookies do not contain anything other than a session identification number which allows the webserver to "remember" where you are online. Session cookies are especially important for using our website, Mobile App and social media sites. Some examples of these cookies include:

- Identifying you as being signed in to SPCU Online Banking and keeping you logged in throughout your visit.
- Remembering the content of forms which you may have completed while you are on our website, Mobile App and social media sites.

Performance Cookies

"Performance" cookies are used by SPCU to provide information on the usage of our website, Mobile App and social media sites (details in relation to which pages on our website users visited, how they got there, what devices and mobile networks they were using etc.). Some of these cookies are saved to your computer so that we know when you revisit our website, SPCU Online Banking and social media sites. All information these cookies collect is aggregated and used anonymously. We use these cookies to understand what content is popular which helps us to improve our services to our members.

Targeting Cookies

"Targeting" cookies remember individual websites you have visited. This assists SPCU in presenting relevant and targeted online advertising to you. When you visit a SPCU website

page targeting cookies may be placed on your machine. Subsequently these targeting cookies (if they have been placed on your machine), can be recognized by subsequent websites you visit, and this allows those sites to present targeted SPCU advertising to you based on your previous web browsing activity. The information collected from these targeting cookies is anonymous.

Social Media Sites

If you are accessing our social media sites, you may be subject to cookies operated by those social media networks. We are not responsible for the activities of third party social media operators so you should check the privacy policies of those operators before using their facilities.

Telephone calls

Please note that any telephone calls to SPCU may be recorded for customer service and to verify the content of any conversation, including customer instructions.

Security

No data transmission over the Internet can be guaranteed to be 100% secure. As a result, while SPCU take all reasonable steps to protect your Personal Data, the nature of the Internet is such that SPCU cannot guarantee or warrant the security of any information you transmit to us while using our website, Mobile App and social media sites. Any information that you do provide to SPCU is at your own risk.