



### **Who we are?**

We are Jubilee Tower Credit Union Ltd

Our registered office is 5 – 7 Bolton Road, Darwen, Lancashire, BB3 1DF

You can contact us on 01254 776611

Or email [jubileetowercu@btconnect.com](mailto:jubileetowercu@btconnect.com)

Jubilee Tower Credit Union is committed to protecting our Members' privacy. We require personal information and data about you so that we can manage your relationship and/or account(s) with us. This personal information and data will be held securely in Jubilee Tower Credit Union's systems in accordance with our Data Protection Policy.

### **Why do we collect your personal information?**

We need to collect your personal information for several reasons. These include:

- To operate the Credit Unions business, products and services to an expected high standard of quality, security, safety, sustainability and longevity
- To operate your account or other services on your behalf. This may include: savings account, loans, managed account, applications, credit checks, credit references, credit control
- To comply with our legal and regulatory obligations. These include: to confirm your identity, record your transactions, prevent financial crime and money laundering, undertake internal and external auditing, sending statements, invitations to our Annual General Meetings
- To work towards our social purposes and impacts
- To work with partner agencies to achieve these goals
- For providing our Members with appropriate and sufficient information for them to participate fully in their Credit Union
- For development and promotion of new products and services
- To operate as an employer and volunteer placement organisation
- To undertake tasks in the public interest; including sharing information with agencies and organisations whose work is in the public interest
- For direct marketing purposes of our products and services (unless you withdraw consent for this)

### **When do we collect your personal information?**

If you contact Jubilee Tower Credit Union, whether you are a Member or not, you will have information collected by us about you. This can include: name, contact details, a third party (if relevant), the source information from an email or other electronic contact (such as IP address) and any other information you provide to us.

We collect this information to establish who you are in relation to the contact (for example, for data security and confidentiality purposes in ensuring you have appropriate permissions to access an

account) and to respond to your query, request or complaint. It is in your and our best interests to collect this information.

We may also record your telephone call to Jubilee Tower Credit Union. This is because: we like to ensure we have captured correct the information you have given us (for example, for withdrawal requests), in order to operate your account, to help resolve queries or complaints, for regulatory purposes, for training & development purposes, to help detect or prevent fraud or other crime.

### **Who do we share your information with?**

Your personal information as held by Jubilee Tower Credit Union is considered private and confidential. However, we may share and disclose it outside Jubilee Tower Credit Union if:

- Allowed by this policy.
- You explicitly or implicitly consent.
- Needed by our partner agencies, service providers and others involved in operating, or the provision of, accounts & services to us and/or to you on our behalf.
- HM Revenue & Customs or other authorities require it.
- The law, regulatory bodies or the public interest permits or requires it. This may include our commitment to complying with anti-Money Laundering legislation.
- Required by us or other agencies to investigate or prevent crime or where we suspect fraud.
- Required by any other parties connected with your account. This may include parents (if under 16 or otherwise appropriate), joint account holders and beneficiaries (upon your death).
- We need to make or take a payment from you. This will mean we need to share your data with our banking provider (currently Lloyds) and your bank (or the bank of your nominated payee) or our debit card partners (currently Engage by Contis and WorldPay) so we can make/take payments to/from you.
- You have a loan with Jubilee Tower Credit Union. Your data will be shared with our credit referencing partners and our credit control partners (if the loan repayment record requires it) if & when necessary to operate your account.
- Needed to process a loan application. We may supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity. When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders. We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail at [www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain)
- We need to disclose to other appropriate third parties. These may include (if applicable and if appropriate): your employer and our service delivery partner (currently FairQuid) if using our Employee Benefit Scheme payroll deduction scheme, our Direct Payments partner & referral agencies and your named contact & Personal Assistant(s) if you hold a Direct Payments account, our partner agencies and your named household bill services if you hold a Managed Account with us or we pay bills from your Credit Union account, the Local

Authority (Blackburn with Darwen Borough Council) if you access or apply to the Gas & Electricity Crisis Fund scheme we operate on their behalf, the Department for Work and Pensions for their consideration of deductions from benefits if you default on repayments of a loan or overdraft, the Department for Work and Pensions, HMRC or any other benefits/pensions provider regarding a query on a payment they are making to you, any other referral agency, for safeguarding purposes.

- Required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).
- We use third parties for the administration of marketing communications. However, we will not sell or share your information to other companies for marketing of products and services not provided by the credit union or in connection with your credit union account.

### **Contact us**

If you require further information regarding Jubilee Tower Credit Union's usage and storage of your data, or if you feel we have incorrect/outdated information, please contact us and we will be happy to review it with you. It is your responsibility to inform us of any changes to the information or data we hold about you (such as change of name, address etc) and we will continue to hold our current information in good faith until informed otherwise.

You may apply for a copy of all the personal details we have on you. Please understand the collation of such data may take quite some, possibly several weeks, time but you will be advised of a realistic timescale. Also, please be advised there may be a cost to yourself for this collation to cover overheads but this will be kept to an affordable minimum and not be financially prohibitive.

You may ask us to stop holding personal data about you but please be advised we may not be able to provide you with our products services without access to your data. Please also be advised there are circumstances where we may decline this request (such as if you owe us money).

- In person or by writing to– Jubilee Tower Credit Union, 5 – 7 Bolton Road, Darwen, BB3 1DF
- By email - [jubileetowercu@btconnect.com](mailto:jubileetowercu@btconnect.com)
- By telephone - 01254 776611

### **Your right to complain to the Information Commissioner's Office**

The Information Commissioner's Office (ICO) is responsible for Data Protection in the United Kingdom. If you believe Jubilee Tower Credit Union's processing, storage or use of your personal info infringes data protection laws, you have a legal right to submit a complaint to the ICO.

- By writing to – ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
- By email or LiveChat - <https://ico.org.uk/>
- By telephone – 0303 123 1113