

Swan Privacy Notice

Introduction

Swan Community Bank is a member-owned and run savings and loans organisation, with the explicit purpose of providing affordable loans to members and offering a safe place for member savings.

Swan Community Bank is a trading name of Swan Credit Union Limited, which provides Credit Union services in Milton Keynes, Aylesbury Vale, and Oxfordshire. People wishing to join the Community Bank may do so either on our website, or by using the relevant form. This notice provides information on how Swan Community Bank use personal data collected from prospective members, members and members' beneficiaries, and Swan volunteers.

Data Protection Regulations

We are regulated by the EU General Data Protection Regulation and the UK Data Protection Act 2018.

Staying Legal

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data, including:

Consent

In specific circumstances we can collect and process your data with your consent – for example when you tick a box to receive email or paper newsletters.

Contractual obligation

If you take out a loan, for example, we are obliged to use your personal data to manage the transaction.

Legal compliance

If we suspect fraud, we are legally bound to report it to the appropriate authority.

Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your transaction history to make better decisions on future loan applications. We will also use your address details to send you newsletters and direct marketing by email or post, telling you about products and services we think might interest you.

When do we collect your personal data?

- When you visit our website
- When you engage with us on social media
- When you contact us by any means with queries or a complaint
- When you join as a member
- When you apply for a loan
- When you enter prize draws or competitions
- When you choose to complete any survey we send you
- When you've given a third party permission to share with us the information they hold about you

What sort of personal data do we collect?

Joiners

- Contact details, such as a title, names, address, email and phone numbers, date of birth
- Identity verification, such as a driving licence, passport or National Insurance number
- Bank/Building Society details, including account number and sort code
- Joiner's beneficiary contact details

Borrowers (some of this data may be collected by third parties for the purposes of ID and credit checking)

- Employer's details
- Employment history
- Residential status
- Credit history
- Regular outgoings
- Bank statements

Volunteers

As a member-owned and run, not-for-profit organisation, Swan is heavily dependent on volunteers: both to help with local activities and for certain specific roles, such as Board membership. We collect contact details and take references on all volunteers.

What we do with the information we gather?

In order to process membership and loan applications Swan will pass on the personal data given to associated organisations necessary to complete the requested service. These will include both Credit Reference Agencies and Fraud Prevention Agencies.

We use your contact information to send you news about products and promotions, and we provide members with this service (until required by them to stop doing so by clicking on the 'unsubscribe' link) through the 'opt-in' tickboxes on our members website or App. A Swan Community Bank Director acts as Senior Information Risk Owner (SIRO), and may be contacted by email at gdpr@swancommunitybank.org.uk or by telephone on **03030 300147**.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures in our **Information Security Policy** to safeguard and secure the information we collect online.

Where do we send your data?

While countries in the European Economic Area (EEA) all ensure rigorous data protection laws, there are parts of the world that may not be quite so rigorous and do not provide the same quality of legal protection and rights when it comes to your personal information.

Swan does not send your data outside the EEA, but third party organisations who we share data with might do so in limited circumstances – such as in complying with international tax regulations where UK tax authorities may share such data with counterparts in countries where you or a connected person may be tax resident.

How long do we keep your personal data?

We are required by law to only keep your personal data for the period necessary to fulfil the purpose for which it was given, subject to either our legal obligations and/or your request for the data to be corrected or deleted. The procedures are described in our **Data Retention Policy**.

Who do we share your personal data with?

We only share your data with trusted third parties that we use in order to deliver the service required by our members, and to fulfil our legal obligations. We only provide information specific to the need, and we are obliged to ensure their data protection policies are effective. These organisations may have access to your data for the purposes specified:

- [Transunion](#) Credit Reference Agency
- Prominent Media: Hosting our website
- Post Office Mail
- Mailchimp: E-newsletters
- Incuto Data Services Account Management
- Judge & Priestley: Legal services
- Contis Group: Engage Card Services
- Restore: Imaging & archiving for CUS
- Santander Banking Services

If you believe that any information we are holding on you is incorrect or incomplete, please write to us or [email us](#) as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

Contacting the Regulator

If you feel that your data has not been handled correctly, in the first instance the Information Commissioner's Office (ICO) want you to take this up with us, but if you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the ICO.

You can contact them by calling **0303 123 1113**

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

Any Questions?

If you have any questions that haven't been covered, please contact our SIRO by email at gdpr@swancommunitybank.org.uk or by phone on **03030 300147**