



## Social Media Prize Draw Privacy Notice

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.

Our contact details are:

Contact: The Data Protection Representative  
Pennyburn Credit Union Ltd  
Address: 19 Greenhaw Road  
Derry  
BT48 7RZ  
Phone: 028 71352166  
Email: [info@pennyburncreditunion.co.uk](mailto:info@pennyburncreditunion.co.uk)

Pennyburn Credit Union Ltd is committed to protecting the privacy and security of your personal data. This Privacy Notice describes how we collect and use personal data about you during and after your relationship with us.

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

We may collect, store, and use the following categories of personal data about you:

- If you are selected as a winner, we will ask for your name, address, signature & contact details (**in order for us to fulfil the prize**). We may also process interactions with credit union personnel, photographs for social media and our website, complaints and CCTV footage. The personal data provided will be used for the purposes of administering the prize draw/competition. The credit union is the “data controller” of this information. This means that the credit union decides what your personal information is used for, and the ways in which it is processed. We rely on our legitimate interests of running prize draws/competitions as our lawful basis for processing your personal data. If you are successful, we will also process your personal information for post-competition publicity and our lawful basis for such processing is our legitimate interests in promoting the competition.

### **How we collect the information:**

- We collect personal information about nominees from the following sources: Your prize draw/competition entry via Facebook, other competition entry [online, post or in the credit union].

### **How we may share the information:**

We may also need to share some of the above categories of personal information with other parties, such as the Irish League of Credit Unions (ILCU)<sup>1</sup> and our professional advisers such as solicitors or auditors. Usually, information will be

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<sup>1</sup> The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as regulatory, legal, compliance and monitoring services to affiliated credit unions. We may disclose information in the nomination form to authorised officers or employees of the ILCU for the purpose of the ILCU providing services to us

anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators as required to comply with the law.

**Data Retention Periods:**

We will destroy your personal data within 30 Days of the draw end date. If you are a winner, we will retain your personal information for as long as necessary to meet regularity obligations however no longer than 2 years.

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. Where possible we record how long we will keep your data. Once the retention period has expired, the respective data will be permanently deleted.

**Updates to this notice:**

We will make changes to this notice from time to time, particularly when we change how we use your information, and change our technology and products.

An up-to-date version of our General Privacy Notice is available on our website at [www.pennyburncreditunion.co.uk](http://www.pennyburncreditunion.co.uk) or you can ask us for a copy.

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



**Find out** whether we hold any of your personal data and **if we do, to request access** to that data and to be furnished with 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 information. 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).



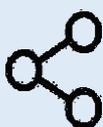
**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.



**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 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 for processing is your consent or on a contract that you have entered into with us*'.

You have a **right to complain** to the **Information Commissioners Office (ICO)** in respect of any processing of your data by;

**Tel:** 028 9027 8757 or 0303 123 1114 / **Email:** [ni@ico.org.uk](mailto:ni@ico.org.uk) / **Post:** ICO, 3rd Floor, 14 Cromac Place, Belfast, BT7 2JB.

**\*Please note that the above rights are not always absolute and there may be some limitations\***

If you want access to 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 or a third party a copy of your relevant personal data in a reusable format, please contact us in writing using the contact details above.

**There is no fee for using any of your above rights**, unless your request for access is clearly unfounded or excessive. We also reserve the right to 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 tell us straightaway if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us on the details above.