



## **Membership Terms & Conditions**

- To become a member of London Plus Credit Union Ltd, a person must fulfil the common bond qualification for entry to membership and must provide sufficient evidence to prove their identity and address as required to comply with all relevant laws, regulations, and rules in respect of money laundering prevention.
- To take full advantage of our products and services, you must pay an initial £3.00 membership fee and a further requirement to hold a minimum of £5.00 in your share account.
- Your membership will commence from the date of the first deposit.
- Savings can be withdrawn at any time subject to any outstanding loan balance preventing you from doing so. Please ensure you read the relevant loan terms and conditions should you borrow.
- An annual dividend will be paid into your share account, subject to surplus, on all sums deposited. The rate at which the dividend is paid is determined at the Annual General Meeting. Dividend payments are gross of tax.
- If you wish to terminate your membership you can do so by requesting the relevant paperwork from the office. Any available shares will be paid to you on the closure of your account.
- It is your responsibility to inform us of any changes in your personal details.
- We have the right to cancel membership if we believe you have fraudulently acquired membership/services from us.

## **Cancellation of Membership**

The membership agreement may be cancelled without penalty within 14 days, under the Financial Services (Distance Marketing) Regulations 2004. The cancellation period commences on the date the member signed this agreement. Cancellation must be done in writing by any of the following means: In writing to London Plus Credit Union, 274 North End Road, Fulham London SW6 1NJ or via email to [info@londonpluscu.co.uk](mailto:info@londonpluscu.co.uk)

# **Managing Your Information** **Privacy Notice Summary**

## **Introduction**

London Plus Credit Union Limited (also known as Wandsworth Plus Credit Union, a registered trading name) is committed to protecting the privacy of its members' information.

This notice explains how we collect and use your personal information, and the rights that you have. More detailed information is contained in our full London Plus Credit Union Privacy Notice, which you can obtain from our office or on our website at [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk)

## **How We Obtain Personal Information**

We obtain information directly from you when you apply to join the credit union or to obtain a loan. We also obtain information in other ways, for example from third-party credit reference agencies (CRAs) and from seeing how you use our services including the transactions through your accounts with us and your communications with us such as telephone calls, emails, SMS and social media.

We may also obtain information from employers, tracing agencies, solicitors and debt recovery agencies to assist us with the recovery of loans. Lastly, we may also obtain information by recording and monitoring telephone calls or from CCTV, either for training and quality control or for safety purposes or legal reasons.

## **How We Use Your Personal Information**

We use your personal information to meet legal obligations (for example, to confirm your identity when you join the credit union, and keep details about you on our register of members). We also use your personal information to perform our contract with you (for example, to operate your savings accounts, to make and administer any loans that we make to you, and to keep you informed about the credit union).

From time to time we may provide you with information about our products and services, or conduct market research. You can ask us to stop contacting you for these purposes at any time.

Most of our loan decisions are reviewed by a member of staff. We may use an automated decision-making process to assist us with certain types of loan applications. Where we rely on this process to make an automated decision, you have the right to have that decision reviewed by a member of staff.

## Sharing Your Personal Information – Credit Reference Agencies and Other Third Parties

We will disclose your personal information to third parties only in limited circumstances. This will include disclosure to CRAs and fraud prevention agencies, who help us to assess creditworthiness and affordability, recover debts and prevent criminal activity. We will also disclose information to our suppliers, and in limited circumstances to other organisations who provide services to you directly.

By proceeding with your loan application via our website you expressly consent to us sharing your personal, contact and loan application details (“the Shared Personal Data”) with our registered Open Banking partner, Perfect Data Solutions Limited (“PDS”) who are also a credit reference agency. During your loan application we shall safely and securely direct you to PDS’s secure portal (“the Portal”) for the purposes of granting PDS access to your bank or building society account information (“Transaction Information”). As soon as your Transaction Information is received it shall be reported back to us in the form of a completed search in order that we may continue to process your loan application (“the Permitted Purpose”).

CRAs keep a record of any search that we make against you and of your loan repayment history. They will also share your information with banks and other lenders. This may affect your ability and/or the ability of your associates to obtain credit in the future. More information about CRAs is contained in the Credit Reference Agency Information Notice, which you can obtain from any of our office or on our website at [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk) We do not directly transfer your information outside the European Economic Area.

## Your Privacy Rights

You have a number of rights under data protection regulations. You have the right to see a copy of your personal data, and to correct any mistakes. You have the right to object to our processing of your data, or restrict that processing, in certain circumstances. You may also ask us to provide personal data in a form that is portable to a third party, and to erase your data unless we have legitimate reasons to keep it.

## Contact Us

If you would like information, or wish to exercise any of your privacy rights, please contact us. Our contact details are as follows:

**London Plus Credit Union Limited**

**274 North End Road, Fulham, London, SW6 1NJ**

**Telephone; 020 7471 2620**

**Email: [info@londonplusu.co.uk](mailto:info@londonplusu.co.uk)**

**Web: [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk)**

**London Plus Credit Union Limited** is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority – Firm Reference. It is 473340 a member of the Financial Ombudsman Service and member deposits are covered by the Financial Services Compensation Scheme.



# Managing Your Information



## Privacy Notice

### 1. Introduction

We - London Plus Credit Union Limited (also known as Wandsworth Plus Credit Union, a registered trading name) - are committed to protecting our members' privacy. The credit union is required to obtain and keep certain information about you either to meet our legal obligations or to enable us to perform our contract with you. Where you are not able to provide us with this information, we may not be able to open an account for you. Where we request further information about you that is not required for these reasons, we will ask you for your consent.

### 2. How we obtain personal information

We obtain personal information:

- directly from you, for example when you fill out an application to join the credit union;
- by observing how you use our products and services, for example from the operation of your accounts and the payment history on your loans, as well as your communications with us such as telephone calls, emails, SMS and social media;
- from other organisations such as credit reference and fraud prevention agencies, employers, tracing agencies, solicitors and debt recovery agencies; and
- from other people who know you, including people you are linked to financially.

We may also obtain some personal information from monitoring or recording calls and when we use CCTV. We may record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve

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queries or issues. We may also use CCTV on our premises to ensure the safety and security of our staff and customers.

### **3. How we use your personal information**

London Plus Credit Union may process, transfer and/or share your personal information in the following ways:

#### **To meet our legal obligations**

- confirm your identity;
- perform activity for the prevention of financial crime;
- carry out internal and external auditing; and
- record basic information about you on our register of members.

#### **To perform our contract with you**

- operate your account(s) or run any other services we provide to you (including the provision of statements, new terms & conditions, information about changes to the way your account(s) operate, information about the credit union and your membership rights and notification of our annual general meeting);
- consider any applications made by you and make and administer any loans;
- carry out credit checks, and obtain and provide credit references; and
- undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business.

#### **Based on our legitimate interests**

- take steps to maintain and develop our relationship with you, including marketing our products and services and market research (you may ask us to stop contacting you for these purposes at any time).

We may occasionally share your information with third parties where you have authorised us to do so. Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We do not routinely collect or process data of this kind and will only do so with your explicit consent. We will only use this kind of personal information where:

- we have a legal obligation to do so;
- it is necessary for us to do so to protect your vital interests;

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- it is necessary for the prevention or detection of crime;
- it is necessary for insurance purposes; or
- you have specifically given us explicit consent to use the information.

### 4. Sharing your personal information

We will disclose information outside the credit union only:

- to third parties to help us confirm your identity to comply with money laundering legislation;
- to credit reference agencies and debt recovery agents who may check the information against other databases – private and public – to which they have access;
- to any authorities if required to do so by law (e.g. to HM Revenue & Customs to fulfil tax compliance obligations);
- to fraud prevention agencies to help prevent crime or where we suspect fraud;
- to organisations who provide a service or benefits to you, in some cases pursuant to data sharing agreements that we have entered into with those persons. These may include, but are not limited to, insurers, your Council or your housing provider, your employer and Optimus Card Group. (who provide our Debit cards);
- to our suppliers in order for them to provide services to us and/or to you on our behalf, for example third parties who help us to operate online lending systems or who assist us to recover debts, audit our accounts or carry out statistical analysis;
- to anyone in connection with a reorganisation or merger of the credit union's business.

### 5. Open Banking

This section of our Privacy Policy relates to Open Banking and should be read in conjunction with the other clauses in our Privacy Policy. In the event of conflict with any other clauses, this clause shall prevail.

#### What is Open Banking?

- Open Banking is the secure way of providing access to your bank or building society account to providers who are registered for this purpose.
- Registered providers and participating banks and building societies are listed under the Open Banking Directory.



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- Open Banking was set up by the UK Government to encourage more competition and innovation in the financial services sector.
- As a forward thinking lender, we support the use of Open Banking as it allows us to process loan applications efficiently, securely and in our consumer's best interests.
- By permitting access to your bank or building society account information we are able to make a better lending decision as we shall be able to verify your income, outgoings and other matters in order to assess what loan terms would be suitable for you based upon what you can reasonably afford to repay.
- Further information about Open Banking is available from [www.openbanking.org.uk](http://www.openbanking.org.uk).

### How we will use and share your data for the purpose of online banking

- By proceeding with your loan application via our website you expressly consent to us sharing your personal, contact and loan application details ("the Shared Personal Data") with our registered Open Banking partner, Perfect Data Solutions Limited ("PDS") who are also a credit reference agency. During your loan application we shall safely and securely direct you to PDS's secure portal ("the Portal") for the purposes of granting PDS access to your bank or building society account information ("Transaction Information"). As soon as your Transaction Information is received it shall be reported back to us in the form of a completed search in order that we may continue to process your loan application ("the Permitted Purpose").
- Further information about PDS including their registered provider and regulatory status is available from [www.lendingmetrics.com](http://www.lendingmetrics.com).

### Is Open Banking secure?

- PDS are registered under the Open Banking Directory as an account information service provider and are also regulated by the Financial Conduct Authority as a payment services firm under number 802599. Any data you submit via the Portal will be encrypted and its usage tracked as part of set Open Banking data security standards.
- We are responsible for the secure transmission of any Shared Personal Data to PDS, for safely directing you to the Portal and for the safe receipt and usage of your Transaction Information.

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- You will not be required to share your banking password or log in details with either us or PDS. Once you have given your explicit consent to share your bank account information on the Portal you will be directed to your own bank or building society's login page where you will enter in your own login details directly.
- Save as set out above or elsewhere in this Privacy Policy, we are not responsible for your direct data transmissions with PDS or with your own bank or building society.

### How we will use your shared personal data and transaction information

- PDS shall, subject to their own terms and conditions and privacy policy, and, if your bank or building society is registered to provide access under the Open Banking Directory, obtain your Transaction Information and submit this back to us for the Permitted Purpose. By way of example, the Transaction Information that we shall receive is likely to include information relating to your income, outgoings and credit worthiness.
- PDS shall be entitled to re-access your Transaction Information for up to 90 days from the date of your original search result in order to refresh the search results, obtain a snapshot of your data or gather additional data.
- PDS shall hold the Shared Personal Data and the Transaction Information they receive and retain according to their own terms and conditions and privacy policy, available on the Portal, which you will be required to read and consent to once directed their via our website.
- As PDS are also a credit reference agency they may also share and keep a record of your Shared Personal Data and Transaction Information.

The Transaction Information we receive about you will only be used for the Permitted Purpose. We do not sell or share Transaction Information with any third party

Where your bank or building society have already permitted access to your Transaction Information you shall need to contact them directly in order to withdraw your consent under their particular Open Banking terms and conditions.



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Your individual data protection and privacy rights including the right to access, correct, delete, object, restrict, withdraw consent, request transfer and/or make a complaint, continue to apply to relevant personal data we control or process and are dealt with elsewhere in this Privacy Policy.

Under Open Banking as your personal data is shared by your bank or building society and accessed by PDS you may also be able to exercise your individual data protection and privacy rights against either of them pursuant to their own terms and conditions and privacy policies.

### **6. Where we send your personal information**

While countries in the European Economic Area 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.

The credit union does not directly send information to any country outside of the European Economic Area. However, any party receiving personal data may also process, transfer and share it for the purposes set out above and in limited circumstances this may involve sending your information to countries where data protection laws do not provide the same level of data protection as the UK.

For example, when complying with international tax regulations we may be required to report personal information to the HM Revenue and Customs which may transfer that information to tax authorities in countries where you or a connected person may be tax resident.

### **7. Retaining your information**

The credit union will need to hold your information for various lengths of time depending on what we use your data for. In many cases we will hold this information for a period of time after you have left the credit union, but we will not hold your information for longer than is necessary.

We are required to retain your details in our members' register permanently by legislation, and to retain certain details in our accounting records to maintain the financial integrity of our systems and comply with regulatory obligations. We generally dispose of archived paper records after six years, in line with financial regulation, excluding papers and scanned copies relating to loans or debts that remain active or recoverable.

## 8. Credit reference agencies

In order to process any credit applications you make, we will 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, validate bank accounts and cards, 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 (for example, banks and other credit providers).

Where we have made a loan to you, we will continue to exchange information about you with CRAs on an ongoing basis, including about the loans that you have received and your repayment history, including 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. This may affect your ability and/or their ability to get credit.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail on:

- Our website at [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk)
- TransUnion (formerly CallCredit) at [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain)
- Equifax at [www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)
- Experian at [www.experian.co.uk/crain](http://www.experian.co.uk/crain)

## 9. Your rights

Your rights under data protection regulations are:

- (a) The right to access
- (b) The right of rectification
- (c) The right to erasure
- (d) The right to restrict processing
- (e) The right to object to data processing
- (f) The right to data portability
- (g) Rights related to automated decision-making
- (h) The right to withdraw consent
- (i) The right to complain to the Information Commissioner's Office

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These rights are explained in more detail below.

### **The right to access**

You have the right to access a copy of your personal data along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge by contacting us. Please make all requests for access in writing, and provide us with evidence of your identity.

### **The right to rectification**

You have the right to instruct us to promptly correct any inaccurate personal data about you and where appropriate, to have any incomplete personal data about you completed.

### **The right to erasure**

In some circumstances you have the right to the erasure of your personal data without undue delay.

Those circumstances include:

- the personal data is no longer needed for the purpose it was originally processed;
- you withdraw consent you previously provided to allow us to process the information;
- the processing is for marketing purposes; or
- the personal data was unlawfully processed.

However, we will not erase this data where we need it to meet a legal obligation or where it necessary for the establishment, exercise or defence of legal claims.

### **The right to restrict processing**

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- you contest the accuracy of the personal data;
- processing is unlawful but you oppose erasure;
- we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; or
- you have objected to processing based on our legitimate interests, pending the verification of that objection.

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In practice, we do not expect that this right will be relevant to our members, given the nature of our activities. Members will instead be protected by their rights to rectification and erasure and to object to direct marketing. However, where you are entitled to restrict processing on any of the four grounds set out above, we may continue to store your personal data, but we will only otherwise process it:

- with your consent;
- for the establishment, exercise or defence of legal claims; or
- for the protection of the rights of another natural or legal person.

### **The right to object to processing**

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the data is necessary for the purposes of the legitimate interests pursued by us or by a third party.

You therefore have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. We do not otherwise process data based on our legitimate interests.

### **The right to data portability**

To the extent that the legal basis for our processing of your personal data is:

- consent; or
- that the processing is necessary for the performance of our contract with you,

you have the right to receive your personal data from us in a commonly used and machine-readable format or instruct us to send this data to another organisation where this is technically feasible. This right does not apply where it would adversely affect the rights and freedoms of others.

### **Rights related to automatic processing**

We may use an automated decision making process to assist us with processing certain types of loan applications, to make sure that our decisions are quick, fair, efficient, and correct based on what we know.

The automated lending decision system looks at your credit score alongside information such as:

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- the amount applied for;
- your income and expenditure;
- your history of repaying debts;
- the number and value of any County Court Judgments (CCJs) you have;
- the number of accounts you have that are in default;
- information available from public sources such as the insolvency service;
- whether or not you are bankrupt; and
- your age;

and provides a recommendation or makes a decision based on either:

- set policies e.g. the credit union does not lend to those less than 18 years of age, or the credit union does not lend to people with over a certain value of CCJs; or
- the predicted likelihood of the repayment of the loan based on the statistical analysis of whether individuals who had a similar credit profile repaid their debts in the past.

Generally your application will then be reviewed by a member of the credit committee, before we make a final decision. However, where we rely on the automated system to make our decision, you have the right to have that decision reviewed by a member of staff, express your point of view, and obtain an explanation of the decision and challenge it.

### **The right to withdraw consent**

To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

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

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office which is responsible for data protection in the UK. You can contact them by:

1. Going to their website at: <https://ico.org.uk>
2. Phone on 0303 123 1113
3. Post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## 10. Contact us about your rights

For more information about how your rights apply to your membership of the credit union or to make a request under your rights, you can contact us as below. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay. Our contact details are:

**London Plus Credit Union Limited**

**274 North End Road, Fulham, London SW6 1NJ**

**Telephone 020 7471 2620**

**Email: [info@londonpluscu.co.uk](mailto:info@londonpluscu.co.uk)**

**Web: [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk)**

## 11. Changes to this privacy policy

We can update this Privacy Policy at any time and ideally you should check it regularly at [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk) for updates. We won't alert you for every small change, but if there are any important changes to the Policy or how we use your information, we will let you know and where appropriate ask for your consent.

**London Plus Credit Union Limited** is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority – Firm Reference . It is 473340 a member of the Financial Ombudsman Service and member deposits are covered by the Financial Services Compensation Scheme.