



The Privacy Policy

Affinity Plus Credit Union Limited (hereinafter interchangeably referred to either as “we” or “us” or “the Credit Union”) is committed to protecting your privacy through the use of the best technology that can give a safe member experience both online and offline. As a credit union we are primarily focused on our members and pride ourselves on offering them quality, relevant services.

The Information We Collect About You

We will hold:

- Identity & contact information
- Financial details
- Marital status and/or financial associations
- Other personal information
- Sensitive categories of data e.g. health information for insurance purposes
- Information to which you have provided consent to us to use
- Information about you provided by others e.g. joint account/group account applications or guarantor details
- Other information such as: telephone recordings, CCTV images at our branches and ATMs and information provided when exercising your rights.
- Information about your computer hardware and software that is automatically collected by the Credit Union when you use our online channels. This information can include:
 - browser type
 - domain names
 - access times and
 - referring website addresses
 - your IP address
 - your geographic location

When We Collect Your Information

We collect information:

- you give us;
- from your use of our products, services or our websites (through cookies), mobile apps, message boards, online forms, chat areas and;
- provided to us by third parties.

Use of Cookies

The Credit Union also uses "cookies" to collect information. A cookie is a small data file that most major websites write to your hard drive for record keeping purposes when you visit them. Cookies allow the Credit Union to measure activity on the site and to improve your user experience, for example by remembering your passwords and viewing preferences, thus allowing you to visit various member-only parts of the Site without re-registering.

Cookies are used by the Credit Union to measure activity on the site and make improvements and updates based on which areas are popular and which are not. The Credit Union does not use cookies to retrieve information from your computer that was not originally sent in a cookie.

Except for personal information voluntarily provided by you (i.e., during membership registration or a contest), the Credit Union does not use information transferred through cookies for any promotional or marketing purposes, nor is that information shared with any third parties whatsoever.

You may occasionally get cookies from advertisers, which is standard in the Internet industry. The Credit Union encourages you to review the privacy statements of websites you choose to link to from the Credit Union's website so that you can understand how those websites collect, use and share your information. The Credit Union is not responsible for the privacy statements or other content on websites outside of the Credit Union and its family of websites.

How We Use Your Information

We use, and share, your data in the following cases:

- To assess eligibility and credibility for the services, products and facilities we offer
- To provide credit union and other related or affiliate services, products and facilities to you
- To implement any contracts we have entered into with you

- To conduct credit searches with credit reference agencies in order to provide credit facilities and, where necessary, for fraud prevention and debt recovery.
- To comply with a legal obligation (e.g. reporting to the Financial Service Commission, regulatory authorities and law enforcement)
- To use for our legitimate interests such as managing our business on a day to day basis including credit risk management, providing service information, conducting marketing activities, training, quality assurance and strategic planning
- Where you have agreed or explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time)
- To register you for electronic newsletters or other membership services, with your specific consent
- To track activity and collect information on your preferences which will assist in enhancing your online user experience and offering of relevant products and services
- To conduct research about your opinion of current services or of potential new services that may be offered, the operation of the service, the maintaining of quality of the service, and to provide general statistics regarding use of the Credit Union's website.

How We Use Automated Processing Of Your Data

We may analyse your information using automated means to:

- Assist in making assessments where you apply for a loan including creditworthiness and affordability.
- Assist in compliance with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing, for example, to screen for suspicious transactions.
- Identify your suitability/eligibility as a prospect for a particular product or service.

Who We Share Your Information With

Sharing can occur in the following circumstances and/or with the following:

- Our systems suppliers who test backup data,
- Our supplier used for checking the names of members against sanctions lists,
- Our off-site storage supplier
- Debt collectors & solicitors used for recovery of outstanding debts
- Members authorised representatives
- Guarantors
- Statutory and regulatory bodies and law enforcement authorities
- Credit reference/rating agencies all of whom would be subject to confidentiality agreements

Restricted Use of Information

The Credit Union does not sell, rent or lease its member data to third parties. The Credit Union may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique, personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party.

In addition, we may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to the Credit Union, and they are required to maintain the confidentiality of your information. The Credit Union does not use or disclose sensitive personal information, such as race and religion, without your explicit consent.

Please keep in mind that if you directly disclose personal identity information or personally sensitive data through the Credit Union's public message boards, this information may be collected and used by others.

How Long We Hold Your Information

Our retention periods are subject to legislation, regulatory rules set by our regulator and the type of financial product or service provided to you.

Rights of Data Subjects

Regulations such as the Barbados Data Protection Act 2019 (BDPA) and the General Data Protection Regulation (GDPR) EU acts to empower data subjects who are Barbadian and EU citizens with enhanced rights in relation to how information is used. Data subjects must also provide consent to the use of their data and for specific purposes. More on the Barbados Data Protection Act 2019 (BDPA) can be found at <https://www.barbadosparliament.com/bills/details/396>.

More on the GDPR can be found at www.gdpr-info.eu.