



# Data Privacy Notice

This document explains how and when Núa collects personal data from and about you, why Núa does so and how Núa treats this information. It also explains your rights in relation to the collection of personal information and how you can exercise those rights.

### **Data Controller**

Nua Money Limited, trading as Núa, is the data controller within the meaning of the General Data Protection regulations (GDPR) which became effective on the 25<sup>th</sup> of May 2018 and the Irish Data Protections Acts 1988 to 2018.

### **Data Protection Officer**

Núa has appointed a designated data protection officer. If you have any queries with respect to how Núa processes your personal data or wish to exercise your rights under GDPR please to log into your customer portal and send us a secured message. Alternatively, you can email [dpo@nuamoney.com](mailto:dpo@nuamoney.com)

### **Information we require and collect**

We collect information:

- (i) you give us;
- (ii) information generated during the provision of our services or use of our websites,
- (iii) information provided to us by third parties, including credit intermediaries.
- (iv) digital bank statements obtained by third party Account Information Service Providers (AISPs) using Open Banking protocol, based on your explicit authorisation and consent.

The types of information we may collect or hold about you include:

- Identity details, including your contact information;
- Your financial details including bank statements/financial circumstances;
- Your marital status;
- Your financial associations;
- Information about you provided by others e.g., joint account applications;
- Information which you have consented to us using; and
- Other personal information such as: criminal conviction data; telephone recordings; and information provided when exercising your rights set out below.
- On occasion, we may use your information even though you are not our customer. For example, you may be a gift donor, guarantor or representative of a customer of ours or be a potential customer applying for one of our products or services.

### **Impact of missing information**

If you do not provide certain information, we may not be able to:

- Assess your loan application or answer certain queries that you may have;
- Provide requested products to you;

- To continue to provide existing products or services;
- To assess the affordability and suitability of a product.

### **Purposes of processing and the legal basis of processing**

We use, and share, your data where:

- You have agreed or explicitly consented to the using of your data in a specific way (e.g., to receive information on new products). If you have provided your consent, you may withdraw your consent at any time by via customer portal or by emailing [dpo@nuamoney.com](mailto:dpo@nuamoney.com);
- Use is necessary to provide a service or fulfil a contract that you have entered into (e.g., to provide you with a mortgage) or because you have asked for something to be done so you can enter into a contract with us (e.g., you have asked us to provide you with a loan offer).

This includes:

- Managing or administering your account or insurance policies;
- Processing your application(s) for mortgage approval;
- Where you apply for or avail of a mortgage loan, to carry out credit reviews including assessment of bank account transactions through Open Banking, automated credit decision processes and to obtain details of your credit history from the Central Credit Register or any other credit rating agency;
- Contacting you by electronic messaging through your portal, telephone, text message, electronic mail or other means but not in a way contrary to your instructions to us or contrary to law or regulation;
- Facilitating a potential or actual transfer of any mortgage loan or in connection with a securitisation.
- Use is necessary because we have to comply with our legal obligations as a regulated Retail Credit Firm (e.g., establishing your identity under anti-money laundering regulations).
- Use is necessary to protect your “vital interests” in exceptional circumstances;
- Use for our legitimate reasons such as managing our business and fraud prevention. this may include risk management assessments, providing service information, conducting new product and market research and compiling statistics, training and quality assurance, portfolio management and strategic planning, and the purchase or sale of assets. You may object to your personal information being used for these purposes.

### **Automated decision-making including profiling**

We may assess your data using automated means to:

- Help us understand your financial needs and develop our relationship with you;
- To help us to offer you future products and service information we believe will be of interest to you;
- To allow us to perform a more accurate and quicker assessment when you apply for a mortgage including creditworthiness and affordability reviews. We may make lending decisions based solely on an automated analysis of your information.

We also use automated processing to assist in compliance with our legal obligations in connection with prevention of money laundering, fraud and terrorist financing.

If you do not agree with any decision that we make in relation to your mortgage application which is based solely on automated processing, you can email [dpo@nuamoney.com](mailto:dpo@nuamoney.com)

### **Sharing your personal data - third parties**

While providing the most technology efficient operational services to you, complying with legal obligations or pursuing our legitimate interests, we may share your personal data with the following categories of recipients:

- Third parties to whom:
  - (i) we need to share your information to facilitate transactions you have requested,
  - (ii) you ask us to share your information.
- Our appointed agents;
- Your authorised representatives;
- Service providers who provide us with support services to enable delivery of our services;
- Statutory and regulatory bodies including the Central Bank of Ireland, Central Credit Register and law enforcement authorities;
- Debt collection agencies, budgeting and advice agencies, tracing agencies, receivers, liquidators, examiners, official assignee for bankruptcy and equivalent in other jurisdictions, any other party involved in facilitating a potential or actual transfer of any mortgage loan or product provided to you or in connection with a securitisation;
- Business or joint venture partners.

### **How long will we hold your data**

As a general rule, we will keep your data for 6 years after the end of our relationship with you. We always aim not to hold any of your personal data longer than is necessary to fulfil the relevant purpose and/or comply with a specific legal retention period.

## **Your rights under GDPR**

You have several rights in relation to how we use your data, including the right, without undue delay to:

- Find out if we used, accessed or received your information;
- Have inaccurate/incomplete information corrected and updated;
- Object to particular use of your personal data for our legitimate business interests or direct marketing purposes;
- To withdraw consent at any time where processing is based on consent;
- In certain circumstances, to have your information deleted or our use of your data restricted;
- In certain circumstances, a right not to be subject to solely automated decisions and where we make such automated decisions, a right to have a person review the decision;
- Exercise the right to data portability (i.e., obtain a transferable copy of your information we hold to transfer to another provider).

If you wish to exercise any of your data rights, you can contact our data protection officer by emailing [dpo@nuamoney.com](mailto:dpo@nuamoney.com)

If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall explain the reason why.

We will provide you with the relevant information electronically.

## **Complaints**

If you are not happy with any aspect of how your data is used, you also have the right to complain to the Data Protection Commission in Ireland.

You can contact the office of the data protection commissioner at:

21 Fitzwilliam Square South

Dublin 2, D02RD28

Telephone: +353 (0)761 104 800 or lo call number 1800 437437

Email: [dpo@dataprotection.ie](mailto:dpo@dataprotection.ie)