

Comhairle Chontae na Mí

Teach Buvinda, Bóthar Átha Cliath, An Uaimh,
Contae na Mí, C15 Y291

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Meath County Council

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Tel: 046 – 9097000/Fax: 046 – 9097001

E-mail: customerservice@meathcoco.ie

Web: www.meath.ie

Registration No.: 00172770

Data Protection Privacy Statement for

FIN003 - Loans Receivable

Who we are and why do we require your information?

Meath County Council seeks to promote the economic, social and cultural development of County Meath and in doing so contribute significantly to improving the quality of life of the people of County Meath. The delivery of high quality services, tailored to meet the needs of all our customers, remains one of Meath County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment. In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of County Meath, we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being offered, the information sought may include 'personal data' as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to current, past and future service users; past; current and prospective employees; suppliers; and members of the public who may engage in communications with our staff. In addition, staff may be required, from time to time, to collect, process and use certain types of personal data to comply with regulatory or legislative requirements.

Why do we have a privacy statement?

Meath County Council has created this privacy statement in order to demonstrate our firm commitment to privacy and to assure you that in all your dealings with Meath County Council, we will ensure the security of the data you provide to us. Meath County Council creates, collects and processes a significant amount of personal data in various multiple formats on a daily basis. Meath County Council's commitment is that the personal data you may be required to supply to us is;

- Obtained lawfully, fairly and in a transparent manner
- Obtained for only specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained
- Recorded, stored accurately and securely and where necessary kept up to date
- Kept only for as long as is necessary for the purposes for which it was obtained.
- Kept in a form which permits identification of the data subject
- Processed only in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Data Protection Policy

Meath County Council has a detailed Data Protection Policy which outlines how we as a public body are committed to ensuring the security of any personal data you provide to us.

What is the activity referred to in this Privacy Statement?

Processing of Loan applications under the Local Authority Home Loan initiative. Assessing of Loans that fall into arrears under the Loan Arrears process (which also includes the Mortgage Arrears Resolution Process) and where necessary progressing files to legal proceedings.

What is the basis for making the processing of personal data in this activity lawful?

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Meath County Council [Article 6(1)(e) of the General Data Protection Regulations, 2016].

We require your contact details

In order to communicate with you, you will be asked for contact details. You do not have to provide all contact details but providing more, such as email, phone, address, makes it easier to communicate. Please note that to help protect your privacy, we take steps to verify your identity before granting access to personal data. These contact details may also be used to verify your identity.

What items of personal data do we need to undertake this activity?

(a) Loan Application Data - Name, address, date of births, personal public service number, phone number, email address, eircode, copy identification, all financial information - credit card, loan, savings, bank statements, Employment Detail Summaires, Statement of Liability, Payslips, Certified Accounts, utility bills.

(b) Loan Arrears Process Data which also includes the Mortgage Arrears Resolution Process - all of the above plus social welfare statements and receipts.

(c) Loan Application Data - as part of the eligibility criteria the applicant must prove they have an indefinite right to remain in Ireland through nationality or refugee status - ethnic origin.

(d) Medical Records - may form part of the file under the Loan Arrears Data - mental/physical category.

(e) Divorce Decree or a Maintenance Court Order may form part of a Loan Application, Loan Arrears file or a Transfer of property/loan into joint/sole names.

The data may also be sourced from

1. Central Credit Register provide us with a financial record of the Borrower. Applicant signs for consent to do so.
2. Social Media is also used as a publicly accessible source.

This personal data will be used for the following purpose(s):

All Personal Data (Name, address, date of births, personal public service number, phone number, email address, eircode, copy identification, all financial information - credit card, loan, savings, bank statements, Employment Detail Summaires, Statement of Liability, payslips, Certified Accounts, utility bills) are required to;

(a) assess Loan applications & make recommendations.

All Personal Data listed above and Sensitive Data (medical records and court orders) are required for;

(b) Loan Arrears Process - Assess applications and provide sustainable resolutions for Borrowers in arrears.

Is the personal data submitted as part of this activity shared with other organisations?

Meath County Council may, to fulfil statutory or regulatory obligations or in the public interest, from time to time, have to share personal data with other organisations or entities (in Ireland or abroad). Where this is required Meath County Council shall have regard to the security and integrity of the data and will minimise the data shared.

In this activity, the data will be shared with the following recipients:

1. Central Credit Register information from Meath County Council on the data subject in order to supply the Council with financial history on the data subject.
2. Housing Agency receive Loan Applications for underwriting purposes.
3. Local Government Management Agency is provided with a montly loan extract report for statistical analysis.
4. Cornmarket is an insurance company that provides mortgage protection insurance to Local Authority Borrowers and receives from a montly list by email of new and expired loans.
5. The Council's Solicitors receive information from us in order to progress legal proceedings.
6. The Applicants Banks receive direct debit forms.

In this activity, if the personal data is to be transferred to a different country, it will be transferred to the following countries (if there are no countries listed, it is not intended to transfer the personal data abroad).:

N/A

How long is this personal data held by Meath County Council?

Meath County Council has a detailed record retention policy which goes in to more detail of the time period for which your personal data will be retained by Meath County Council and what will happen to it after the required retention period has expired.

The data processed as part of this activity will be retained for the following period(s):

1. Loan Applications.

(Refusals) - retain for 6 months from the date the Credit Committee signs it or 2 years if the Credit Committee overturns the Housing Agency's decision. Retain records from decision + 7 years, then destroyed.

(Appeals) - 6 months from the date of the decision of the Appeals Committee or Ombudsman.

(Approvals that dont progress) - 12 month period from the date the Credit Committee signs it.

(Approvals with Loan drawdown) - copy of the application, identification verification, Housing Agency and the Council's recommendation/decision and all other correspondence will be kept for the life of the loan, however all unnecessary documentation will be destroyed.

Deletion of files will include shredding of the hard copy file and deleting the scanned copy.

A register of loan applications received and adjudicated on will be kept indefinitely.

2. Loan Arrears.

The file will be kept with the original loan file and retained for the life of the loan. All financial information for assessment will be retained for a 12 month period. The Standard Financial Statement, decision grids, schedule and all other correspondence will be kept for the life of the loan file. Deletion of files will include shredding of the hard copy file and deleting the scanned copy.

3. Refunds - one off refund applications via online banking, proposer deletes all record of bank details held, processor holds for 3mths and then deletes record. DEFT (Direct Debit System) - DD returned 3 times by bank removed from DEFT (Direct Debit system), Original DEFT Mandate form shredded and copy removed from Ascendas. Standing Orders once activated by the bank, original is shredded.

What will happen if the requested personal data is not provided?

1. Loan applications will not be assessed due to lack/inadequate information.

2. Under the Mortgage Arrears Resolution Process, no protections or resolutions will be offered to a Borrower in arrears due to a lack/inadequate information.

Your Rights

You have the right to request access to personal data held about you, obtain confirmation as to whether data concerning you exists, be informed of the content and source of data and check its accuracy. In addition, if the data held by us is found to be inaccurate you have the right to change, remove, block, or object to the use of, personal data held by Meath County Council. You also have the right to data portability. In certain circumstances blocking access to data may delay or remove access to a service where the data is required by law or for essential purposes related to delivery of a service to you. To exercise these rights, you should contact Meath County Council (Data Controller) at the following address:

email: dataprotection@meathcoco.ie

Data Protection Officer,
Meath County Council,
Buvinda House,
Dublin Road,
Navan,
Co. Meath

Right of Compliant to the Office of the Data Protection Commissioner

If you are not satisfied with the outcome of the response you received from Meath County Council in relation to your request, then you are entitled to make a complaint to the Data Protection Commissioner who may investigate the matter for you.

The Data Protection Commissioner's website is www.dataprotection.ie

Contact Data Protection Commissioner at <https://www.dataprotection.ie/en/contact/how-contact-us>

Phone Number: 01 765 0100/1800 437 737

Postal Address:

Data Protection Commissioner

21 Fitzwilliam Square South
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Ireland