

**READING NJANGI OF CAMEROONIANS CREDIT UNION LTD
(RENCAMCUL)
General Data Protection Regulation (GDPR) and Data Privacy
Policy**

Introduction

The General Data Protection Regulation (GDPR) is a new set of EU rules and regulations for data protection, and more specifically; **personal data**. It is all about giving individuals more control over what is done with their personal data, and also aims at harmonise the data privacy regulatory environment across the EU. This new regulation is far broader in scope than the existing Data Protection Act, and will replace the later once it comes into existence from May 25th 2018.

Any breach of the GDPR could lead to heavy fines, and firms could be fined up to 20,000,000 Euros (or 4% of annual turnover) for non-compliance. It is therefore extremely important that RENCAMCUL takes all aspects of GDPR very seriously and ensure we are complaint at all times in our handling of customer personal data.

Personal data in this GDPR context is any information which may be related to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, location data, phone number, age, gender, an employee, a job applicant, clients, suppliers and other business partners.

In light of the above, RENCAMCUL wants to ensure a high level of data protection as we know privacy is a cornerstone in gaining and maintaining your trust. We are therefore committed in respecting your rights surrounding the information that we hold about you. This information is held for the sole purpose of fulfilling our contractual obligations and in strict respect of the following principles:

- Your personal data shall always be processed lawfully, fairly and in a transparent manner in relation to the data subject;
- The personal data will only be used for a specified, explicit and legitimate purposes used in strict compliance with the GDPR principles while complying with all other relevant regulations and legislation;
- Your personal data shall be kept in a form which permits your identification for no longer than is necessary for the purposes for which the personal data is processed;
- Your personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- We strive to store and process your personal data in way that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage and any form of cyber risk;
- You can contact RENCAMCUL at any time to manage, amend and modify your personal data held by RENCAMCUL, and we will seek your consent before processing your personal data for any activity outside the scope of our contractual obligation with you;

What information do we collect about you?

At the point of entering a relationship with RENCAMCUL, we collect some personal data about you, and we will not collect more than what is needed. The personal data is needed to provide you with the services we offer and to ensure we remain compliant with the global regulatory standards. The personal data we collect includes your name, email, address, phone numbers, date of birth. In some instances, we may also collect the following information: National Insurance and documents containing personal information such as Passport, ID card and Driving license.

How we collect your personal data

The personal data we collect from you comes in through various channels and we store this data securely in order to manage your relationship with the credit union. This data will include information you provide when you apply to become a member of RENCAMCUL. In addition to the information you provide via the website when completing the application form, some of your personal data could have also been collected via email, letters or during telephone calls and conversations with RENCAMCUL staff members. As a financial institution working in collaboration with other parties, some of your personal data could also have been received from third party organisations such as credit referencing agencies and fraud prevention agencies that we expect to process and deal with your data in compliance with the GDPR. We will only collect information that is needed to fulfil our contractual obligations with you as well as our regulatory obligations.

What we do with the personal data we collect

This section of the document explains how we use the personal data we collect about you when you register with the RENCAMCUL or other personal information you provide after becoming a member of RENCAMCUL.

In other to on-board you and create your RENCAMCUL account as well as fulfil our contractual obligations to you, it will be necessary and in our legitimate interests to process your personal data in the manner set out below. In certain situations, we may also ask you to supply limited sensitive or special category personal data such as your criminal records, if need ever arises. We will only ask for sensitive personal data when it is needed to comply with a statutory obligation. In the event of death, we will use the personal data you have provided in identifying and processing the next of kin.

Processing and disclosure of personal Data

To continue providing you with the services we offer, we may disclose your personal data to service providers processing your information on our behalf, for example if you are using the money remittance services of the credit union, your personal data may be shared with a third party acting as the principal, since the credit union acts as an agent of the principal in the relationship. In other rare and exceptional instances, your personal data may be shared with other third parties such as the law enforcement agencies, credit referencing agencies and fraud prevention agencies if need ever arises. RENCAMCUL will only share your personal data if we have a legitimate business purpose

in the disclosure. In the event where your sensitive personal data needs processing, we shall seek your explicit consent.

A request for such consent shall be presented in a manner, which is clearly distinguishable from other matters, in an intelligible and easily accessible form, using clear and plain language.

Deletion of personal data

We will keep your personal data only for as long as is necessary. The personal data we collect from you is securely saved and will only be held for as long as it is necessary for the maintenance of your account while in a relationship with RENCAMCUL, except we are compelled to hold it for a longer than required period for legal or regulatory reasons.

Contact and complaints

For all queries relating to RENCAMCUL privacy policy and questions about your personal data, please contact info@rencam.co.uk

Data Storage and Transfer

The personal data we collect from you is securely stored on our servers located in the European Economic Area, and in a way that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage and any form of cyber risk.

Access to your personal data and correction

You have the right to request, and be provided with a copy of the personal data that RENCAMCUL holds about you at any given time, and also to update the data. In the event were you would like a copy of some or all of your personal information, please email us at info@rencam.co.uk

Mail shot to members (personalised)

Mail Subject: We have updated our privacy policy

Dear {first_name}

As a provider of trusted financial services to you, RENCAMCUL is committed to maintaining the highest standards in privacy and compliance.

You probably have heard of the new European Union's General Data Protection Regulation (GDPR) that's coming into effect on 25 May 2018. The GDPR is a new EU regulation made up of an extensive set of rules meant to protect and give you control over your personal data.

RENCAMCUL has therefore updated its privacy policies, procedures, guidelines and systems for the processing and safe-keeping of your personal data, so as to give you the maximum transparency and rights over your own data, for as long as that data is in our keeping.

The purpose of processing and storing your personal data is to be able to fulfil our contractual obligations to you and also enable the smooth delivery of all the services we offer. We only process a minimum amount of information about you, and that is done in strict compliance with the regulatory requirements and will henceforth be done in compliance with GDPR.

In some instances, we will share the information with third parties, such as our partners especially if you are using the money remittance services.

To read the RENCAMCUL fully updated privacy policy, please click [here](#).

Regards,

Rencamcul Team

RENCAMCUL GDPR JOURNEY



Recommendations for immediate Action:

1. It is strongly recommended the Credit Union subscribes to the Business version of Dropbox, and take immediate steps to move all customer data from the free version onto the Business version.
2. Send a whatsapp broadcast to all existing customers to request consent for the Credit Union to continue sending them whatsapp messages regarding our services (especially the remittance service)
3. Add opt-in boxes to the online/offline application forms, for new customers to consent to receiving messages from the credit union including the whatsapp broadcast and also to agree they have read and understood the data privacy policy.
4. Add a data privacy policy link to the website and upload the privacy policy (p. 1 - 3) onto the website.
5. Send an email (p.4) to all existing customers informing them of the data privacy updates providing them with a link to read the full policy.