



Last updated: 21 May 2018

We know that your privacy is important to you, so we've developed a privacy policy that covers how we collect, use, disclose, transfer and store your personal information.

This document outlines our approach to Data Privacy in order to fulfil our obligations under the General Data Protection Regulation (2016/679) (EU).

Who we are

We are Microfinance Ireland DAC with an address at 10 Earlsfort Terrace, Dublin 2 and registered under company number 516555. Microfinance Ireland DAC was established pursuant to the Microfinance Loan Fund Act 2012.

We provide micro loans to small businesses which are unable to obtain finance from conventional commercial lenders.

This notice sets out the basis on which any personal data we collect from you, or from others, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Acts and the General Data Protection Regulation (GDPR) (the Acts), the Data Controller is Microfinance Ireland DAC (**'Microfinance Ireland'**).

What personal information do we collect from you?

You may give us personal data by:

- Filling in forms on microfinanceireland.ie (our website) such as the 'Get Started' Registration 'Contact Us' or 'Request a Call Back' forms. Please note that sensitive personal and financial information is not requested and should **never** be submitted through these channels.
- Using our website. For further information please see our Cookie Policy at <https://microfinanceireland.ie/cookies-policy/>
- Opting to receive news and updates in relation to our organisation or our services by signing up either through our site or at an event
- Applying for a loan with us either directly or through your Local Enterprise Office ('LEO') or Local Development Company ('LDC'). The type of information you may provide includes your name; email; phone number; current and previous addresses; tenant or homeowner status; rent/mortgage payments; date of birth; gender; dependents; employment status;

income details; bankruptcy details if applicable; purpose of loan; other financial commitments and loan details; business plan and financial projections; work experience and employment background; referees; personal and business bank statements; list of creditors and debtors: ICB Report; and video footage for the purpose of success stories or marketing campaigns (in which you have agreed to participate).

- Corresponding with us by phone, SMS, email, website, social media or otherwise. We ask you to disclose only as much information as is necessary to provide you with our products or services or to submit a question/suggestion /comment in relation to our site or our services or products.
- Applying to work with us. The type of information you may provide includes your CV, a cover letter, your name, address, email address and phone number. CVs should include information relevant to your employment history and education (degrees obtained, places worked, positions held, relevant awards, and so forth). We ask that you do not disclose sensitive personal information (e.g. gender, height, weight, medical information, religion, philosophical or political beliefs and financial data) in your application.
- Supplying us with goods or services. Suppliers provide us with information which may include a contact name; phone number; email address; business address; and billing payment details.

What information about you do we collect from others?

When you use our services, we may obtain the following categories of personal data from others:

- Your name
- Email address
- Phone Number
- Trading stage (i.e. start-up/existing)
- Length of time trading
- Amount of loan sought
- Primary business type
- Location/area
- Credit History
- Information regarding previous loan applications with other financial institutions
- Miscellaneous information relevant to your application for microfinance with us which you may provide to the External Credit Assessor whom we have engaged to act on our behalf in assessing your application.

Where do we get this information?

- Directly from you
- Your LEO or LDC
- Mentors appointed by your LEO or LDC
- Financial institutions and other business advisors who may refer you to us at your request or who may have declined your application for a loan with them.
- We may contact the Central Credit Register for information when reviewing your credit history
- External Credit Assessors whom we have engaged to act on our behalf in assessing your information
- Other websites (e.g. Social Media sites) with your consent

Why do we collect this information?

We collect the information in order to provide you with our services, to promote our services, to improve our site and to recruit staff.

We will use this information:

- To carry out our obligations arising from any agreements entered into between you and us e.g. to provide you with our loan services
- To fulfil our statutory functions under S.I. No. 393/2015, Microenterprise Loan Fund Scheme 2015 which includes the provision of loans to newly established or growing microenterprises unable to secure finance through commercial financial institutions; the creation of a website capable of handling direct applications from individual microenterprises; the reporting of management information to other bodies and the promotion of the scheme through marketing
- To create a contact record for you at enquiry stage so that we can support you in submitting an application
- To set your company up as a supplier on our systems
- To liaise with you about projects that we are undertaking with you
- To create a candidate profile for you if you are a prospective employee
- To administer and improve our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep our site safe and secure
- To deliver information about our products and services, where you have subscribed to receive same

- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- To make suggestions and recommendations to you and other users of our website about services that may interest you or them
- CCTV – To monitor access to our office
The legal bases for the processing of your data are:
- Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us as the controller by virtue of our statutory functions set out under the Microenterprise Loan Fund Act 2012 and S.I. No. 393/2015, Microenterprise Loan Fund Scheme 2015
- Processing necessary for the performance of a contract which you have entered into with us or to take steps at your request prior to entering into a contract
- Processing necessary for compliance with a legal obligation to which we are subject
- That you have provided consent for the processing for one or more specified purposes such as marketing, for example, when you subscribe to receive news and updates about our organisation

Who do we share this information with?

We may share your personal data with selected third parties including suppliers and contractors in order to provide you with our services. For example, these suppliers may include our web hosting provider and our IT service providers.

In addition, we may disclose your personal information to third parties with your consent:

- **Referral Partners***: we may pass information about you to our referral partners with your consent.
- **Credit Bureau**: we may provide details of your microfinance payment history to the Central Credit Register.
- **External Credit Assessors****: we may provide personal information to external credit assessors that we appoint to assist us in the assessment of your microfinance application. They may contact you directly.
- **European Investment Fund (EIF)**: MFI has obtained a credit guarantee from the EIF. Consequently, we may be subject to external review by representatives of the EIF, the European Investment Bank, the European Commission or other members of the European Investment Bank Group.
- **Required by law**: if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect our rights; property or safety of our customers and others. This

includes exchanges information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- We may hold your information on our cloud based lead management system
- With your consent and from time to time, we may share your personal data with our Marketing Agencies for the purpose of developing marketing collateral and/or customer stories

***Who are our referral partners?**

When we refer to our “referral partners” we mean entities, such as the LEOs or LDCs, other enterprise agencies, business advisers or banks, which introduce you to us or to whom we refer you for support during the loan application process.

We refer some loan applicants to our referral partners as they can assist with training and guidance in the microfinance application process. In some cases, they may submit your microfinance application to us on your behalf – they should do this with your consent.

While we may refer you to a referral partner or they may recommend you apply for microfinance from us, you should be aware that they operate independent of us when providing you with assistance and training. We are not responsible for the quality of their service.

Our referral partners have their own policies that govern their collection, use, and disclosure of personal information. We suggest therefore that you read their privacy policies to learn about their practices, as we are not responsible for them.

A referral partner may undertake an initial local evaluation of a microfinance application; in this case (unlike above) they do so on our behalf, i.e. as our service provider. This initial assessment is not definitive; we always draw our own conclusions based upon a detailed assessment.

****Who are external credit assessors?**

In some cases, we engage third parties to assist us in connection with the assessment of your microfinance application. These third parties are referred to as “external credit assessors”. They provide services to us and have agreed to use your information only for the purposes we request

How long do we keep hold of your information?

The time periods for which we retain your information depends on the type of information and the specific purpose for which we use it. We will keep your information for no longer than is required or permitted.

For further information on the periods for which your personal data is kept, please see our data retention policy which can be accessed on <https://microfinanceireland.ie/data-retention-policy/>

Do we transfer your information outside the European Union or European Economic Area?

We currently host your personal information within the European Economic Area. However, it is possible that at some point your personal information may, for example, be maintained,

processed and stored by us and our service providers in countries outside of the European Economic Area (EEA). These countries may have different data protection rules and standards to those in Ireland. We will handle your personal information in the manner described in this privacy statement, even in countries whose laws provide less protection for your information. You agree to the transfer and hosting of your personal information outside of the EEA by using or accessing the website and/or by submitting information to us.

What are your rights with respect to your personal data?

You have the following rights:

- The right to access the personal data we hold about you.
- The right to require us to rectify any inaccurate personal data about you without undue delay.
- The right to have us erase any personal data we hold about you in circumstances such as where it is no longer necessary for us to hold the personal data or, in some circumstances, if you have withdrawn your consent to the processing
- The right to object to us processing personal data about you such as processing for profiling or direct marketing.
- The right to ask us to provide your personal data to you in a portable format or, where technically feasible, for us to port that personal data to another provider provided it does not result in a disclosure of personal data relating to other people.
- The right to request a restriction of the processing of your personal data.

Where our processing of your personal data is based on your consent to that processing, you have the right to withdraw that consent at any time but any processing that we have carried out before you withdrew remains lawful.

You may lodge a complaint with your local supervisory authority with respect to our processing of your personal data. The local Supervisory Authority in Ireland is the Data Protection Commissioner. The website is www.dataprotection.ie

Changes to this Policy

Our business changes constantly and our privacy statement will also change, so please review it frequently. Updated versions of the privacy statement will always be posted on our website. The date the privacy statement was last updated is set out at the top of this Privacy Statement.

If we make a material change in how we treat your personal information, we will take reasonable steps to notify you in advance of the planned change.

How you can contact us

Our Data Protection Contact is Mick Murray who can be reached as follows:

Phone: 01 2601007 or Mobile 087 738 2038

Post to: Microfinance Ireland, 13 Richview Office Park, Clonskeagh, Dublin 14. Eircode: D14 Y867

Email: info@microfinanceireland.ie