

MHSCCU PRIVACY POLICY

Where we are one family



Kanifing Institutional Area
info@mhscu.com

Medical and Health Services Cooperative Credit Union (MHSCCU) Privacy Policy

Privacy Policy

This is a statement or a legal document that explicitly states how the MHSCCU through its staff or website collects, store and process personal data of its members or visitors. It clearly describes how confidential personal data shall be kept and whether member personal data will be shared with third parties or sold for marketing purposes.

WHAT IS DCN

Data Confidentiality Notice (DCN); its objective is for the protection of personal information.

WHO ARE MHSCCU?

Medical and Health Services Co-operative Credit Union is a Credit Union for the entire medical and health practitioners, service providers and its affiliates in The Gambia. Our offices and shared branching offices can be found in the following locations.

Kombo

- MHSCCU Kanifing Industrial Estate, opposite The Gambia Football Federation (GFF)
- MHSCCU Brikama (Shared branch office GTUCCU Brikama branch office)

Banjul

- MHSCCU Marina Parade Banjul, Paediatrics Unit, EFSTH

Farafenni

- MHSCCU Farafenni General Hospital

Jarra Soma

- MHSCCU Soma (Shared Branch office GTUCCU Soma branch office)

Bansang

- MHSCCU Bansang town centre

Basse

- MHSCCU Basse (Shared Branch office GTUCCU Basse branch office)

WHAT PERSONAL DATA DO WE COLLECT

The following personal data may be collected, retained, processed by MHSCCU, in some cases verified.

- I. Name
- II. Address
- III. Email
- IV. Phone Number
- V. Work address
- VI. Identification Documents (Passport, ID Card, drivers licenses)
- VII. Signature
- VIII. Payslip
- IX. Details of the product(s) you hold with us including transaction data and history
- X. Interactions with Credit Union staff and officers in the premises
- XI. All Correspondence by email
- XII. Complaints
- XIII. CCTV footage

WHAT SPECIAL CATEGORIES OF DATA DO WE SHARE?

Sharing of personal data needs higher level protection when the need arise, justification for collecting, storing and using of such information and it may be processed in the following circumstances.

- I. In rare circumstances, explicit written consent will be sought.
- II. Legal obligations will be sought for where the need arise.

In the event that a member is deceased, a death certificate is required to attach to the personal data stored with us for passing it on to Central Finance Facility (CFF). . It includes Loans and Savings Guarantee Scheme (LSGS). By virtue of our affiliation with NACCUG, your personal data will be shared with CFF for claims on your behalf.

All Government request or regulations would be adhered to.

WHY DO WE COLLECT AND PROCESS PERSONAL DATA

Relevant data about , the member transactions, relationship and interactions with the MHSCCU will be collected and processed for the following reasons:

✓	Fulfilling Contractual Agreement: This basis is appropriate where the process is necessary to enable us manage members accounts and be able to provide the services and products of the Credit Union.
✓	Administration Purpose: Data provided by members through application for membership or any other form of application that is kept with the MHSCCU, will be used for the relevant purpose.
✓	Security: To ensure repayment of loan(s) approved and issued, it may be necessary to require guarantors to act as security in order to make sure the loan is repaid. Should members account go into arrears, the MHSCCU will contact the guarantor(s) to repay the debt and as a result details of indebtedness will be provided to the guarantor(s).
✓	Third Party: At certain times of the operation MHSCCU may appoint third parties for operational functions, in such cases personal data might be given to the third party (Lawyers, Auditors etc) to execute the needed operational functions assigned to them. All data will be adequately protected during the course of the operation in tandem with data protection and confidentiality procedures.
✓	NACCUG: MHSCCU is affiliated to NACCUG and they provide services and business support such as professional development, insurance, training and development and technical services. Certain Personal information or information +-on transactions may be disclosed to NACCUG to enable them render these services .

❖	Legal Duty: This basis is appropriate when MHSCCU is processing personal data to fully comply with Legal requirements for Credit Unions.
✓	Regulatory and Statutory Requirements: To meet the obligations of the regulators, the Central Bank of The Gambia, authorised employees may be allowed to review records for reporting, auditing or compliance purposes. Information provided to the MHSCCU may be retained after stop being a member for the same reason. Other statutory bodies such as the Ombudsman of The Gambia may require sharing information of members..
✓	Compliance with Anti-Money Laundering and Counter Financing Terrorism Act : Information provided by members will be used as part of due diligence for compliance with the anti-money laundering and combating financial crime as required by law
✓	Audit: To fulfil the legal and regulatory requirements, personal data will be shared with the Auditors.

✓ Next of Kin: Personal data of next of kin will be collected in the event that the member dies he or she can receive the amount in the member's account.
✓ Credit History: When application for loan is being processed members credit history will be revisited. The guarantors shall be Contacted for confirmation
✓

CONSENT

Consent will be sought for any process requiring the use of bio or personal data.

Data Retention Duration

Records	Retention duration
Membership Application	10 years
Accounts Transaction information	10 years
Copies of Identity documents	10 years
Loan application forms	10 years
Loan supporting documents	10 years
Withdrawal and lodgement documents	10 years
Member Complaints	7 years
Standing order form	5 years

RIGHTS TO PERSONAL DATA

- I. Enquire about the use of personal data.
- II. Right to rectify any inaccurate data.
- III. To request a copy of relevant data such as account statements etc.

PERSONAL DATA SHARED WITH A THIRD PARTY

All third party service providers shall apply strict security measures to ensure data shared is safe and in line with our privacy policies.