Privacy Notice of St. Canice's Kilkenny Credit Union Limited – General

A credit union is a member-owned financial cooperative, democratically controlled by its members, and operated for the purpose of promoting thrift, providing credit at competitive rates, and providing other financial services to its members.

Data collection, processing and use are conducted for the purpose of facilitating the abovementioned objectives. This Privacy Notice is to provide you with information regarding the processing of information about you for account related purposes and other general purposes and further processing that may be necessary if you apply for a loan with us.

Our contact details are:

Head Office

Address: 78, High Street, Kilkenny.

Phone: (056) 7722042 E-mail: info@stcanicescu.ie

Data Protection Officer.
Contact: dpo@stcanicescu.ie

Sub Offices:	Main Street, Bagenalstown, Co Carlow R21A589	
	Castle Street, Ballyragget, Co Kilkenny R95 AK19	
	Mill Street, Callan, Co Kilkenny R95 F500	
	Mary Street, Durrow, Co. Laois R32 EY76	
	Shannon Street, Mountrath, Co Laois R32 H2VX	
	Main Street, Rathdowney, Co Laois R32 AY16	
	High Street, Graignamanagh, Co Kilkenny R95 C436	
	Main Street, Banagher, Piltown, Co. Kilkenny, E32 XF86	
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St. Canice's Kilkenny Credit Union is committed to protecting the privacy and security of your personal data. This privacy notice describes how we collect and use personal data about you during and after your relationship with us.

What personal data do we use?

We may collect, store, and use the following categories of personal data about you:

• Your name, address, date of birth, email, telephone financial data, status and history, transaction data; contract data, details of the credit union products you hold with us, signatures, identification documents, salary, occupation, accommodation status, mortgage details, previous addresses, spouse, partners, nominations, Tax Identification/PPSN numbers, passport details, interactions with credit union staff and officers on the premises, by phone, or email, current or past complaints, CCTV footage, telephone voice recordings, online identifiers (i.e. cookies)

The credit union will use your personal data to assist it in carrying out the following:

- open and maintain an account for you.
- To meet our obligations under the Credit Union's Standard Rules.
- To contact you in respect of your account and any product or service you avail of.
- To comply with our legal obligation for example anti-money laundering obligations.
- In assessing your loan application and determining your creditworthiness for a loan.
- Verifying the information provided by you in the application.



- In order to purchase loan protection and life savings protection from ECCU.
- Conducting credit searches and making submissions to Irish Credit Bureau and the Central Credit Register.
- Verifying your financial data using Open Banking and/or by you supplying supporting documentation.
- Using credit scoring techniques and (as applicable) other automated decision-making systems to assess your loan application
- Administering the loan, including where necessary, to take steps to recover the loan or enforce any security taken as part of the loan.
- We may use credit scoring techniques [and other automated decision-making systems] to either partially or fully assess your application. Any fully automated decision making process will be processed under the legal basis of performance of a contract & your explicit consent.
- To comply with Central Bank Regulations to determine whether you are a connected borrower or related party borrower.
- Providing updates on our loan products and services by way of directly marketing to you.
- When acting as an insurance intermediary, to meet our obligations.

For Mortgage Applications, the following Supplementary information is required:

- Separation / Divorce Agreement (if applicable)
- 6 months savings statements
- Signed all Declarations, Authorisations and Consents
- Proof of identity (passport, driving licence), if not on file
- 6 months credit card statements (if applicable)
- Stamp 4/5 for non-EU nationals (if applicable)
- 12 months loan statements (if applicable)
- Confirmation of gift letter (If applicable)
- For Top Up or Mover mortgage, have you located title documents?
- 12 months mortgage statements (if applicable)

For PAYE Employees:

- Income certificate(s) signed, dated and stamped by employer
- 3 months consecutive pay slips
- Most recent P60 (P21 required if P60 handwritten)
- 6 months up to date personal current accounts statements

For Self Employed:

- Most recent 3 years audited accounts/trading accounts signed by accountant
- Accountants confirmation of up to date tax position

We may also collect, store and use the following "special categories" of more sensitive personal data:

• Information about your health, including any medical condition, health and sickness (See Insurance for further details)

We need all the categories of information in the list above to allow us to; identify you and contact you and in order that we perform our contract with you.



We also need your personal identification data to enable us to comply with legal obligations. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data

How we use particularly sensitive personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We may process special categories of personal data in the following circumstances:

- 1. In limited circumstances, with your explicit written consent.
- 2. Where we need to carry out our legal obligations and in line with our data protection policy.
- 3. Where it is needed in the public interest, and in line with our data protection policy.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

How secure is my information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes unless they are deemed to be Joint Data Controllers in the specific process¹. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will also be bound by confidentiality obligations.

If you fail to provide personal data

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations.

Change of purpose

You can be assured that we will only use your data for the purpose it was provided and in ways compatible with that stated purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Profiling

We sometimes use systems to make decisions based on personal data we have (or are allowed to collect from others) about you. This This information is used for loans assessment and anti-money laundering purposes and compliance with our legal duties in that regard.

Data Retention Periods

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was obtained, taking into account any legal/contractual obligation to keep it. Where possible we record how long we will keep your data, where that is not possible, we will explain the criteria for the retention period. This information is documented in our Retention Policy. Please see our data retention schedule below

¹ As a joint data controller, the organisations will be required to have provided you with a separate privacy notice setting out what it does with its data.



Once the retention period has expired, the respective data will be permanently deleted. Please see our retention periods below.

- Accounting records required to be kept further to the Credit Union Act, 1997 (as amended) must be retained for not less than six years from the date to which it relates.
- The money laundering provisions of anti-money laundering legislation require that certain documents must be retained for a period of five years after the relationship with the member has ended.
- We keep income tax records for a period of six years after completion of the transactions to which they relate.
- Loan application information is retained for a period of seven years from the date of discharge, final repayment, transfer of the loan.
- CCTV footage which is used in the normal course of business (i.e. for security purposes) for one month.
- Telephone recordings which are used for information, training and complaint investigation purposes, and such recordings are held for 12 months.
- Credit agreements are contracts and as such the credit union retains them for seven years from date of expiration or breach, and twelve years where the document is under seal.
- SBCI Loan documentation is retained for 10 years from date of expiration or breach

Planned data transmission to third countries

There are no plans for a data transmission to third countries

Our use and sharing of your information

We will collect and use relevant information about you, your transactions, your use of our products and services, and your relationships with us. We will typically collect and use this information for the following purposes:



Fulfilling contract This basis is appropriate where the processing is necessary for us to manage your accounts and credit union services to you

Administrative Purposes: We will use the information provided by you, either contained in this form or any other form or application, for the purpose of assessing this application, processing applications you make and to maintain and administer any accounts you have with the credit union.

Security: In order to secure repayment of the loan, it may be necessary to obtain security such as a charge on your property or other personal assets.

Third parties: We may appoint external third parties to undertake operational functions on our behalf. We will ensure that any information passed to third parties conducting operational functions on our behalf will be done with respect for the security of your data and will be protected in line with data protection law.

Guarantors: As part of your loan conditions, we may make the requirement for the appointment of a guarantor a condition of your loan agreement in order that credit union ensures the repayment of your loan. Should your account go into arrears, we may need to call upon the guarantor to repay the debt in which case we will give them details of the outstanding indebtedness. If your circumstances change it may be necessary to contact the guarantor.



Irish League of Credit Unions (ILCU) Affiliation: The ILCU (a trade and representative body for credit unions in Ireland and Northern Ireland) provides professional and business support services such as marketing and public affairs representation, monitoring, financial, compliance, risk, learning and development, and insurance services to affiliated credit unions. As this credit union is affiliated to the ILCU, the credit union must also operate in line with the ILCU Standard Rules (which members of the credit union are bound to the credit union by) and the League Rules (which the credit union is bound to the ILCU by). We may disclose information in your application or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services to us.

The ILCU Savings Protection Scheme (SPS): We may disclose information in any application from you or in respect of any account or transaction of yours from the date of your original membership to authorised officers or employees of the ILCU for the purpose of the ILCU providing these services and fulfilling requirements under our affiliation to the ILCU, and the SPS.

The Privacy Notice of ILCU can be found at www.creditunion.ie

For the processing of electronic payments services on your account (such as credit transfers, standing orders and direct debits), the Credit Union uses BNP Paribas as a Partner Bank, to assist with the processing of payment data.

If you use our electronic payment services to transfer money into or out of your credit union account or make payments though your debit card into your credit union account, we are required to share your data with our electronic payment service provider We have a contractual obligation to provide personal data to CUSOP & Danske Bank, the payments services provider to the credit union.

Debit Card:

If we issue you a Debit Card, Transact Payments Malta Limited (which is an authorised e-money institution) will also be a controller of your personal data. In order for you to understand what they do with your personal data, and how to exercise your rights in respect of their processing of your personal data you should review their Privacy Policy which is available at https://currentaccount.ie/files/tpl-privacy-policy.pdf

Insurance: As part of our affiliation with the ILCU, we purchase insurance from ECCU Assurance DAC (ECCU), a life insurance company, wholly owned by the ILCU. This includes Life Savings (LS), Loan Protection (LP), and optional related riders (where applicable).

If you choose to take out a loan with us, it is a term of your membership, by virtue of our affiliation with the ILCU that the credit union will apply to ECCU for Loan Protection (LP). In order that we apply for LP it may be necessary to process 'special category' data, which includes information about your health. This information will be shared with ECCU to allow it deal with insurance underwriting, administration and claims on our behalf.

Credit Assessment: When assessing your application for a loan, the credit union will take a number of factors into account and will utilise personal data provided from:

- your application form or as part of your loan supporting documentation
- your existing credit union file,
- credit referencing agencies such as the Central Credit Registrar (CCR) managed by CRIF on behalf the Central Bank of Ireland;
- Open Banking, services provided by Plaid B.V. Plaid B.V. is registered in the Netherlands and is regulated by the Dutch Central Bank to provide AISP (Account Information Service Provider)



services within member countries in the European Economic Area. Please note that Plaid B.V is a data controller and maintains a controller to controller relationship with the Credit Union. Plaid collects end user data, i.e. member account related information directly from the member's bank or other account provider based on the explicit consent of such member. Please refer to Plaid's privacy policy available at this link: https://plaid.com/legal/#end-user-services-agreement-eea

The credit union then utilises this information to assess your loan application in line with the applicable legislation and the credit unions lending policy.

Automated Loan Decisioning: We may use automated decision making as part of our loan/credit decision process, and which involves assessing your application for a loan, taking account of your current circumstances and evaluating your ability to meet the required repayments on the loan. The automated decision process involves different types of information, such as information included in your loan application – as to the amount requested, the repayment period, your income, employment details, other loans or overdrafts etc. – as well as information provided to us with your explicit consent as to any account(s) held by you with any other financial institution, and your credit history with the Central Credit Register. The Credit Union uses this information to apply internal credit assessment rules in a consistent manner, and ensures that your application for a loan is treated fairly and efficiently and what is believed to be consistent with your repayment capacity.

Member Service: We may use information about your account to help us improve our services to you.

SBCI Loans

If you take out a Loan through the SBCI process then your data will be shared with the Strategic Banking Corporation of Ireland (SBCI). The SBCI is a joint data controller for this process and their privacy policy is available on https://sbci.gov.ie/information-access/data-protection-statement

Loan Enquiries

If you submit a loan enquiry to the credit union then the data will be shared with the following data processors:

- Cultivate Loans data will be shared with "Collaborative Finance CLG"
- Web loan enquiries the data will be shared with "Solution Centre"

Online Loan Applications and Issuance:

If you apply for a loan from the credit union then the data will be shared with the following data processors:

Wellington IT

This organisation is processing the data under the instruction of the credit union and the credit union remains the data controller for the submitted data and all other related data records. Retention rules are in line with previously stated retention rules for loans.



Legal Duty This basis is appropriate when we are processing personal data to comply with an Irish or EU Law.

Tax liability: We may share information and documentation with domestic and foreign tax authorities to establish your liability to tax in any jurisdiction. Where a member is tax resident in



another jurisdiction the credit union has certain reporting obligations to Revenue under the Common Reporting Standard. Revenue will then exchange this information with the jurisdiction of tax residence of the member. We shall not be responsible to you or any third party for any loss incurred as a result of us taking such actions. Under the "Return of Payments (Banks, Building Societies, Credit Unions and Savings Banks) Regulations 2008" credit unions are obliged to report details to the Revenue in respect of dividend or interest payments to members, which include PPSN where held.

Regulatory and statutory requirements: To meet our duties to the Regulator, the Central Bank of Ireland, we may allow authorised people to see our records (which may include information about you) for reporting, compliance and auditing purposes. For the same reason, we will also hold the information about you when you are no longer a member. We may also share personal data with certain statutory bodies such as the Department of Finance, the Department of Social Protection and the Financial Services and Pensions Ombudsman Bureau of Ireland, the appropriate Supervisory Authority if required under law.

Purpose of the loan: We are obliged to ensure that the purpose of the loan falls into one of our categories of lending.

Compliance with our anti-money laundering and combating terrorist financing obligations: The information provided by you will be used for compliance with our customer due diligence and screening obligations under anti-money laundering and combating terrorist financing obligations under The Money Laundering provisions of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended by Part 2 of the Criminal Justice Act 2013 ("the Act") (and any subsequent AML legislation)

Audit: To meet our legislative and regulatory duties to maintain audited financial accounts, we appoint an external and internal auditor. We will allow the internal and external auditor to see our records (which may include information about you) for these purposes.

Nominations: The Credit Union Act 1997 (as amended) allows members to nominate a person(s) to receive a certain amount from their account on their death, subject to a statutory maximum. Where a member wishes to make a nomination, the credit union must record personal data of nominees in this event. For Nominees the following data is collected: Your name, address, relationship to member, phone number, identity and address verification (ID&V), bank details (to allow payment/transfer of nominated property). The data is processed in the following manner: to record your details in our register of nominations, identify you, to contact you and then upon order upon the passing of the member, to process the nomination (subject to a valid nomination) and transfer any nominated property to you, the nominee(s). The data is collected as follows Nomination form completed by the member & ID&V and bank details provided by you, the nominee(s). This data may be shared with other parties such as the Irish League of Credit Unions (ILCU)1 and our professional advisers such as solicitors or auditors. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or other third parties (such as persons administering the deceased estate) as required to comply with the law. All data will be retained for 6 years from the date of the end of the relationship with the member with the exception of the name of nominee which will be retained permanently in our register of nominations.



Incapacity to Act on your account: The Credit Union Act 1997 (as amended) provides, in the circumstances where you become unable to transact on your account, due to a mental incapability and no person has been legally appointed to administer your account, that the Board may allow payment to another who it deems proper to receive it, where it is just and expedient to do so, in order that the money be applied in your best interests. In order to facilitate this, medical evidence of your incapacity will be required which will include data about your mental health. This information will be treated in the strictest confidentiality.

Credit Reporting: Where a loan is applied for in the sum of €2,000 or more, the credit union is obliged to make an enquiry of the Central Credit Register (CCR) in respect of the borrower. Where a loan is granted in the sum of €500 or more, the credit union is obliged to report both personal details and credit details of the borrower and guarantor shortly to the CCR.

House Loan: Where you obtain a house loan from us, it will be necessary for the credit union to obtain a first legal charge on the property to be purchased and it will be necessary for us to process your personal data in order to register this charge or have this charge registered on our behalf.

Connected/Related Party Borrowers: We are obliged further to Central Bank Regulations to identify where borrowers are connected in order to establish whether borrowers pose a single risk. We are also obliged to establish whether a borrower is a related party when lending to them, i.e. whether they are on the Board/Management Team or a member of the Board/ Management team's family or a business in which a member of the Board /Management Team has a significant shareholding.

ISBAR: We are obliged to under the Ireland Safe Deposit Box, Bank and Payment Accounts Register (ISBAR) to submit information in relation to accounts identifiable by IBAN, and Safe Deposit Boxes to the Central Bank of Ireland. This information relates to account owners and persons who are authorised to provide instructions regarding that account on behalf of the account holder as well as information in relation to safe deposit boxes offered by credit institutions. In line with legislation this information may be further accessed by the Financial Intelligence Unit within An Garda Síochána, the Criminal Assets Bureau (CAB), other branches of An Garda Síochána and Revenue Commissioners. There will be no public access to ISBAR

CESOP (EU cross-border payments reporting): We are obliged, as a Payment Service Provider, to collect and report data on cross border payment transactions. This means that we are required to keep a record of payment transactions and report them to the tax authorities. The services that are within scope include, Card payments (debit and credit cards) (card present and non-card present), Credit and bank transfers (including swift), Direct debits (SEPA and non SEPA), E-money payment, Money remittance transactions. We are required to retain these records in an electronic format for a period of 3 years (from the end of the calendar year of the date of the payment). This data will be aggregated within CESOP and made available to designated staff within each tax administration.



Legitimate interests A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Credit Assessment and Credit Reference Agencies:

When assessing your application for a loan, as well as the information referred to above in credit assessment, the credit union also utilises credit data from credit referencing agencies such as the Central Credit Registrar[See legal duty]. Our legitimate interest: The credit union, for its own benefit and therefore the benefit of its members, must lend responsibly and will use your credit scoring



information in order to determine your suitability for the loan applied for. When using the service of a credit referencing agency, we will pass them your personal details and details of your credit performance.

Debt Collection : Where you breach the	Our legitimate interest: The credit union, where
loan agreement, we may use the service	appropriate will necessary take steps to recover a debt
of a debt collection agency, solicitors or	to protect the assets and equity of the credit union
other third parties to recover the debt.	
We will pass them	
details of the loan application in order	
that they make contact with you and	
details of the indebtedness in order that	
they recover the outstanding sums	
Judgements Searches: We carry out	Our legitimate interest: The credit union, for its own
searches in order to assess your credit	benefit and therefore the benefit of its members, must
worthiness to repay a loan.	lend responsibly and will use your credit history in
	order to determine your suitability for the loan applied
	for. In carrying out such a search we can better
	determine your overall financial position in order to
	lend to you
CCTV: We have CCTV footage installed	Our legitimate interest: With regard to the nature of
on the premises with clearly marked	our business, it is necessary to secure the premises,
signage. The purpose of this is for	property herein and any staff /volunteers/members or
security, public safety and the	visitors to the credit union and to prevent and detect
prevention and detection of fraud.	fraud.
Voice Recording: We record phone	Our legitimate interest: To ensure a good quality of
conversations both incoming and	service, to assist in training, to ensure that correct
outgoing] for the purpose of verifying	instructions were given or taken due to the nature of
information and quality of service	our business and to quickly and accurately resolves any
	disputes
Operational Emails: We will send	Our legitimate interest The Credit Union, where
operational emails to members that are	appropriate, needs to communicate operational
directly affected by a change in the	information direct to affected users of products and
operations of products or services that	services if the operational change impacts on the
they hold	members ability to use the service. This is limited to
	instances that materially affect the user and will not
	contain any marketing messages
Limited Direct Marketing: We may send	Our legitimate interest The Credit Union, where
directed marketing messages to	appropriate, will communicate marketing messages
members if they meet the criteria laid	electronically to members provided the message & the
down by the data protection	recipient member meet the criteria laid down by the
commissioners rules for electronic and	Data Protection Commissioner
direct marketing	https://www.dataprotection.ie/en/organisations/rules-
	electronic-and-direct-marketing
GeoCoding: We may use member's	Our legitimate interest The Credit Union, where
postal addresses to allow the credit	appropriate, will use postal addresses as an input into
union to assess its market penetration	its geocoding process. This is to ensure that the CU has
and thus develop postal marketing	a clear understanding of its level of market penetration
strategies for CU products and services	and areas for growth. The Postal Marketing process



will not use personal information and will rely on anonymised publicly available datasets



Your consent We will only carry out the below processing when we have obtained your consent and will cease processing once you withdraw such consent.

Marketing and Market Research

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may include using the Irish League of Credit Unions and/specialist market research companies. See Marketing Consent Form.

The Credit Union may collect your personal data via Microsoft Forms for the following reasons, participation in Focus Groups & associated communication; and draw process for market research participation & associated communications. This consent will lapse following the completion of the underlying process i.e. for focus group participation - either on the member not consenting to participate or the completion of the focus group process; for voucher draw on completion of the notification process for winners of the draw. The contact details will be retained until either the revocation of consent or completion of the process and then destroyed

Art Competition

This credit union is involved with the Art competition in liaison with the ILCU. Upon entry you will be given further information and asked for your consent to the processing of personal data. Your information is processed only where you have given consent. Where the person providing consent is below 16* then we ask that the parent/legal guardian provide the appropriate consent. A separate privacy notice is included in all Art Competition entry forms.

Irish Life Referral:

If you wish to use the Irish Life Referral process, then the CU will, given your explicit consent, share your contact data with Irish Life Ltd. Irish Life are Joint Data Controllers in this process and their privacy notice is available at https://www.irishlife.ie/ila-privacy-notice/

Your Rights in connection with your personal data are to:









To find out whether we hold any of your personal data and **if we do to request access** to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.

Request erasure of your personal information. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to









processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

Request the restriction of processing of your personal information. You can ask us to suspend processing personal data about you, in certain circumstances.

Where we are processing your data based solely on your consent **you** have a right to withdraw that consent at any time and free of charge.

Request that we: a) provide you with a copy of any relevant personal data in a reusable format; or b) request that we transfer your relevant personal data to another controller where it's technically feasible to do so. 'Relevant personal data is personal data that: You have provided to us or which is generated by your use of our service. Which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.

You have a right to complain to the **Data Protection Commissioner (DPC)** in respect of any processing of your data by:

Telephone: +353 57 8684800 +353 (0)761 104 800 Lo Call Number 1890 252 231

E-mail info@dataprotection.ie

Canal House Station Road
Portarlington R32 AP23 Co. Laois

Postal Address: Data Protection Commissioner

Please note that the above rights are not always absolute and there may be some limitations.

If you want access and/ or copies of any of your personal data or if you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we send you or a third party a copy your relevant personal data in a reusable format please contact Data Protection Officer in writing using their contact details above.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. We also reserve the right to refuse to comply with the request in such circumstances.

We may need to verify your identity if we have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Ensuring our information is up to date and accurate. We want the service provided by us to meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal information. If you wish to avail of either of these rights, please contact us at St Canice's Kilkenny Credit Union, 78, High Street, Kilkenny. Phone:(056)7722042 or info@stcanicescu.ie

St. Canice's Kilkenny Credit Union Limited is regulated by the Central Bank of Ireland

