



European Union (EU) General Data Protection Regulation (GDPR) Frequently Asked Questions (FAQ's)

What is the EU GDPR?

The EU GDPR is a privacy and data security regulation aimed at providing European residents greater control over how their personal information is used in commerce. The regulation refers to EU residents as “data subjects” and requires businesses to provide them certain rights when collecting, storing, transmitting, and processing their personal information. A summary of the regulation’s numerous chapters and articles can be found here: <https://www.eugdpr.org>.

What is the effective date of the EU GDPR?

The effective date is May 25, 2018.

How does the EU GDPR apply to Andrews Federal Credit Union (“Andrews Federal”)?

The GDPR applies to businesses located within the European Union as well as outside (e.g. United States), as long as a business offers goods or services or monitors the behavior (e.g. *profiles members for marketing purposes*) of EU residents. Since Andrews Federal has members overseas, it applies to Andrews Federal’s offering and servicing of our members’ savings and loans, and other transactions. It also applies to our handling of any personal data belonging to any potential members residing in the European Union.

In addition, the regulation specifies duties for controllers and processors of personal information. *Controllers* are those who determine the purpose, conditions, and means for processing personal data, while *Processors* are those businesses that transmit and use personal information on behalf of the controller. Under the GDPR, Andrews Federal is a Controller and the various businesses we contract with to handle our members’ data are our processors. Our service providers are only authorized to process information that is necessary to complete a legal business transaction and to do so at our direction.

What type of data is protected under the EU GDPR?

The EU GDPR protects “personal data” which is any information that can be used to identify a natural person (*a.k.a. data subject*) such as their name, photograph, email address, cookie data, IP address or other information that can identify a person such as a physical or economic characteristic or postings on a social networking site.

How is my data protected under the EU GDPR?

While many of the rights afforded to EU residents under the GDPR are already being provided to our members via our Privacy Policy and data security practices, the regulation also grants EU residents the following privacy and data security rights.¹ For example:

1. ***Right of Access:*** Andrews Federal must be transparent regarding the types of personal data being processed and how that data is being used, upon an EU resident's request.
2. ***Right of Correction:*** EU residents have the right to request that we correct any incomplete or inaccurate personal information we hold about them.
3. ***Right of Data Portability:*** EU residents have a right to have their personal data transferred (in a machine-readable format) from Andrews Federal to themselves or another business, upon request.
4. ***Right to be Forgotten:*** Upon request, Andrews Federal must erase any stored personal data unless there is a legitimate business need to retain or process the information.
5. ***Right to Object:*** EU residents may object to the processing of their personal data at any time when Andrews Federal needs to process their personal data to perform a task in the public interest or for legitimate business needs such as a legal claim.
6. ***Right to Restrict:*** An EU resident may request restrictions be placed on our processing of some or all of the personal information Andrews Federal has collected about them. Such request may be made on a temporary or permanent basis.

How long does Andrews Federal retain personal member data?

Andrews Federal keeps personal information about our members for as long as we continue to provide banking services to you or in order to address a request or complaint. However, we may keep data for a longer period if we have a legal obligation to keep it (e.g., to comply with U.S. recordkeeping laws) or to conduct a financial or contractual or other reporting obligation.

If I have a question or complaint related to my rights under the GDPR, who should I contact?

Andrews Federal is committed to safeguarding our members' personal data. However, we know that complaints sometimes arise. Under the GDPR, EU residents have the right to complain to the Supervisory Authority located in each Member State of the European Union. You should know that Andrews Federal takes these rights seriously and has representatives on hand to assist you.

¹ This FAQ serves to provide an overview of the GDPR. There are other provisions. Please consult the actual regulation for complete information.

For immediate questions or data requests, EU members may contact Andrews Federal's EU Representative at 800.487.5500 (within the U.S.) or 00800.487.56267 (outside the U.S.); or EURepresentative@andrewsfcu.org.

For complaints, members may also contact our EU Representative as outlined above, or our Member Advocate at 800.487.5500 (within the U.S.) or 00800.487.56267 (outside the U.S.); or memberadvocacy@andrewsfcu.org.