

FREQUENTLY ASKED QUESTIONS – THE CENTRAL CREDIT REGISTER

Q 1: What is The Central Credit Register (the 'CCR')?

A: The CCR is a new secure system set-up by the Central Bank of Ireland (the 'Bank') for the **collection of** personal and credit information on loans.

Q 2: Why is the CCR being set-up by the Bank?

A: The **Credit Reporting Act 2013 (the 'Act')** was framed from the recommendations of the Report of the Inter-Agency Working Group on Credit Histories, which recommended the establishment of a central credit register to resolve weaknesses identified in various reports published subsequent to the banking crisis.

The **CCR** will contribute to financial stability and consumer protection by:

- **Providing lenders** with more comprehensive analysis of borrowers' creditworthiness
- **Equipping borrowers** with information on their financial profile
- **Giving the Bank** better insight into financial markets and supporting several functions including prudential supervision, statistics and financial stability.

Q 3: Who operates the CCR and under what legal basis?

A: It is operated by the Bank under the Act.

Q 4: Does the CCR replace Irish Credit Bureau ('ICB') requests?

A; No for the moment. It is in addition to the ICB request; however, it is likely that it will replace the ICB request in the future. This should happen when the CCR is fully implemented in 2018.

Q 5: Are Members/Loan Applicants to be informed about the CCR?

A: Yes. From 30 June 2017, Members/Loan Applicants of Community Credit Union ('CCU') are to be informed about the requirement of CCU to report personal information to the CCR.

Where Members have more than one loan in existence with CCU it is **only** necessary to inform the person once about the CCR.

Q 6: When does the CCR come into effect?

A: From 30 June 2017 and each month afterwards **credit unions**, and any other lender that provides consumer loans for €500 and above, will submit personal and credit information on those loans to the CCR.

Q 7: Will personal and credit information be sent to the CCR where the member has not given ICB consent for the loan?

A: Yes. It does not matter if the member has given ICB consent or not provided the loan is for €500 or more **as at 30 June 2017 it will be submitted** to the CCR.

Q 8: Will loans to minors be reported to the CCR?

A: Yes. Loans to minors that are for €500 or more **as at 30 June 2017** will be submitted to the CCR.

Q 9: What types of borrowers are included on the CCR?

A: Borrowers on the CCR include:

- Companies
- Consumers
- Individuals
- Partnerships
- Sole traders

Types of borrowers can also include **any other entities** that are resident in the State at the time of making the credit application, for example clubs or associations, or where the credit agreement is governed by Irish law. **Guarantors** who provide guarantees or indemnities in respect of other loans will also be included at a future date.

Q 10: What types of lenders are included on the CCR?

A: Over 500 lenders are included on the CCR including **credit unions**.

Q 11: What types of loans ARE included on the Central Credit Register?

A: Loans are included on the CCR **if the loan is for €500 or more** and:

- **the borrower lives** in the State at the time of applying for a loan; or
- the **loan** agreement or loan application **is governed by Irish law**, and the loan is in respect of:
 - Credit Cards
 - Mortgages
 - Overdrafts
 - Personal Loans.

Q 12: What types of loans are NOT included on the CCR?

A: Loans are **not** included on the Central Credit Register in respect of:

- Hire Purchase
- Personal Contract Plans

Q 13: What credit information will the CCR hold?

A: In relation to an **individual** the **credit information** includes, *for example*:

Type of loan; Name of the lender; Amount of the loan; Outstanding balance; Number of overdue payments, if any; Date of next payment; Amount of next payment.

Q 14: What personal data will the CCR hold?

A: In relation to an **individual** the **personal information** includes, *for example*:

Name (first name and surname); Current and previous addresses; Date of Birth; Personal Public Service Number (PPSN); Gender; Eircode; Telephone number.

In relation to an **individual carrying on activities otherwise than as an employee** personal information includes, *for example*:

Legal name of entity; Trading or Business name; Nature of the entity (entity type); Sector of economic activity; Address; Eircode; Companies Registration Office (CRO) Registration Number (or equivalent); Tax reference number; Telephone number.

Q 15: What is the exact legal basis for collecting the individuals PPSN?

A: **Section 6 (1)(f) of the Credit Reporting Act 2013** states “the individual’s personal public service number (within the meaning of section 262 of the Social Welfare Consolidation Act 2005) and any other reference numbers allocated to the individual for the purposes of tax (whether in the State or any other country or territory).”

Q 16: How are PPSNs collected?

A: In respect of ***Credit Agreements***;

- **From 30 June 2017 onwards**, CCU have **legal authority** to collect and report the PPSN to the CCR for all qualifying credit agreements. Where **CCU** already have PPSNs accurately associated with any credit agreements at 30 June 2017 these must be reported in the initial submission and for all subsequent submissions to the CCR.
- Where **CCU does not** hold PPSNs for any existing credit agreements **at 30 June 2017** on our systems **we are not** required to collect these from existing customers.

In respect of ***Credit Applications***;

- CCU may make enquiries on the CCR **from 31 December 2017** onwards and must be in a position to do so no later than **30 September 2018**.

Q 17: Is it now mandatory to acquire PPSN on the opening of accounts?

A: No. it is **not mandatory** to require proof of PPSN at account opening stage. **CCU's** current practice **of asking** for the PPSN remains, however, should the member want **to make a credit application in the future for a loan of €500 or more** then it is **mandatory** to provide the PPSN or else the loan application will not proceed.

Q 18: Do parents who sign indemnities for minors' loans have to provide their own PPSN?

A: No. There is no requirement for **Guarantors** to any loan of €500 or more to provide their own PPSN.

Q 19: What about the Data Protection Acts and the data collected on the CCR?

A: Data Protection legislation applies fully to personal information processes for the purposes of the CCR. Nothing in the Credit Reporting Act 2013 alters the responsibilities and rights of parties arising from the processing of such personal information.

Q 20: Will the data on the CCR determine my loan application?

A: No. The CCR **does not decide** if a loan is approved or not the lender makes that decision.

Q 21: Will the CCR grade my credit rating?

A: No. The CCR **does not score or grade** individual credit reports.

Q 22: Is this a blacklist?

A: No. The CCR **does not create lists or files of defaulters**. Lenders can only request credit reports for a permitted purpose, such as an application for a new loan.

Each lender may make their own decision whether to approve or decline a loan, based not only on a credit report, but also details of income and assets, their own lending policy and any other information that they may require.

Q 23: Is the purpose of the CCR to allow the Bank to pass individual and credit information to the Revenue Commissioners and/or the Department of Social Protection?

A: No. It is a national database that will provide:

- **a borrower with** an individual credit report detailing their credit agreements;
- **a lender with** comprehensive information to help with credit assessments; and
- **the Bank with** better insights into national trends in the provision of credit.

Q 24: How long is information held on the CCR?

A: - Credit information will be held on the CCR for a period of five years from the date a loan is paid off.

Credit performance information, such as outstanding balance and number of payments past due will be held on the CCR for a period of five years from when it was first submitted.

Personal information will be held on the CCR for a period of five years from the date the last loan was paid off.

Q 25: How far back does the information on the CCR go?

A: Personal and credit information will be submitted to the CCR **with effect from 30 June 2017** in relation to new and existing loans.

Q 26: Will my complete loan history be submitted to the CCR?

A: No. From the 30 June 2017 only loan information in respect of any outstanding loans of €500 or more will be submitted to the CCR.

Q 27: Can I obtain my credit report?

A: Yes. It is expected that credit reports will become available **from early 2018** and then **you** will have a right to:

- Request your credit report at any time and the first credit report each calendar year is **free**, however, there **will be a charge** for any additional reports (the amount is undecided yet) requested
- Insert a 200-word explanatory statement on your report

Further details will be available later in the year.

Q 28: Can I apply to have my information amended?

A: Yes. You will be able to make an application to your lender and the Central Bank of Ireland **to amend** information held on the Central Credit Register about you **if you believe** it is incorrect. You will have a right to:

- **add** an explanatory statement of 200 words or less, relating to any of your information held on the CCR, and this will be included on your credit report
- **have** your information amended if you believe it is inaccurate, incomplete or out of date
- **make** a report to the CCR if you reasonably believe that **someone** has, is, or is about to impersonate you.

Q 29: Where can I get more information about the CCR?

A: For **further information** about the CCR please go to www.centralcreditregister.ie

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