

Privacy Policy

Member Privacy Policy

What this Policy covers

This Privacy Policy gives you information about how British Friendly Society Limited, and its subsidiary BFS Member Services Limited (collectively, the “*Society*”) treats personal information we receive about you from the following sources:

- policy applications and enquiries submitted through our website (www.britishfriendly.com) (“Website”);
- policy applications submitted by authorised intermediaries (e.g. independent financial advisers);
- written policy applications and letters sent by post;
- telephone calls or e-mail;
- forms you complete, including for a claim or withdrawal;
- social media;
- participation in case studies or research; and
- information provided by our external medical assessors or other third parties.

Please read the following sections carefully to understand how your personal information will be used and handled by the Society. Your use of our Website is also subject to our Website's Terms and Conditions - visit <https://members.britishfriendly.com/terms-and-conditions/> if you're a member and <https://advisers.britishfriendly.com/terms-conditions/> if you're an adviser for more information.

The Society collects and uses your data in accordance with current data protection law.

Who we are

In relation to any insurance policies, and the Society's discretionary services including Mutual Benefits and BF Care, the data controller with control of your personal information is British Friendly Society Limited of 45 Bromham Road, Bedford, MK40 2AA.

In relation to any credit granted, the data controller with control of your personal information is BFS Member Services Limited of 45 Bromham Road, Bedford, MK40 2AA.

The contact details for the Society's Data Protection Officer can be found in the ‘Contact’ section at the end of this policy.

Our Website may, from time to time, contain links to and from the websites of the Society's partner networks, advertisers and affiliates. Please note that those websites will have their own privacy policies and the Society does not accept any responsibility or liability for such third parties or their policies/websites.

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Intermediaries

If you are an authorised intermediary acting for an individual and you provide that individual's personal information to us via our Website, over the phone or by other means, such as through a portal, then you warrant and confirm that you are supplying their information in accordance with data protection law and that you have first drawn their attention to this Privacy Policy. Please refer to the most recent Intermediary Terms of Business for further information concerning your data protection obligations.

If you are an individual and a third party (e.g. your independent financial adviser) is authorised to supply your personal information to us in accordance with data protection law then this Privacy Policy refers to that third party as an "authorised intermediary".

For the avoidance of doubt, the terms of this Privacy Policy concern the relationship between the Society and you, not the relationship between your authorised intermediary and you. If you have any questions about how your authorised intermediary processes your personal information, please speak to them directly.

Parents, guardians, sponsors and proxies

If you are a parent, guardian or sponsor of a child policyholder or child policy applicant then this Privacy Policy, unless otherwise stated, applies to your personal information and to the personal information of the child. This policy also applies, where applicable, to persons casting proxy votes on behalf of members of the Society.

To find out how we process your personal information if you are a nominated beneficiary, executor, power of attorney or other authorised third party, please refer to our 'Relevant Third Parties Privacy Policy' that can be found at

<https://members.britishfriendly.com/privacy-policy/>

Information - collection, use and grounds for processing

The Society collects and processes information about you from a variety of sources. This includes information:

- you provide to us by application form, claim form, enquiry letter, e-mail, phone call or by contacting us through the 'Contact Us' section of our Website;
- provided by your authorised intermediary when they make a policy application on your behalf;
- obtained from your doctor or another medical professional, including your medical records or information, for the purposes of assessing an application for one of our insurance products or for assessing a claim;
- obtained from your employer, the Department for Work & Pensions, external investigators, public sources (including the internet) and where applicable, your school, for the purposes of assessing a claim;
- you provide to our appointed external medical assessors which is shared with us when you complete a medical assessment or medical screening;
- you provide to us when you agree to participate in case studies or research; and
- provided to us by third parties which we process to meet rules and regulations relating to the prevention, detection and mitigation of financial crime, to administer your application, your policy or any claim you make under your policy.

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The information we collect and process may include (but is not limited to) your:

- personal details including your name, date of birth and gender
- contact details including your address, e-mail address and phone number
- lifestyle information including about your tobacco usage and alcohol consumption, and information about your hobbies
- nationality and ethnicity
- financial details including your bank account number and sort code
- information about other insurance policies you have
- occupation and employment information.

Where you agree to participate in case studies, we may collect and process information such as your image, including photo(s) and/or video(s), and information about your hobbies.

We may also collect and process special categories of more sensitive personal information about you. This could include information about your health and genetics which we need to consider when determining your eligibility or suitability for our products or services, or criminal offence data which we may process for the purposes of preventing, detecting, and mitigating financial crime in accordance with our legal and regulatory obligations.

We process this information to:

- supply you (directly or through your authorised intermediary) with details of our products and services where you have requested these from us;
- check your eligibility and suitability for products or services which we offer and to notify you (directly or through your authorised intermediary) of what products and services we can offer you, to provide you with illustrations, and to determine whether your application for one of our policies has been successful;
- if you have applied for, enter into, or bring a claim under a policy which we provide in partnership with our external reinsurer(s), provide the reinsurer(s) with your information so that they can make a decision on your application or claim, or to support servicing your policy;
- supply you with the products or services you have purchased or requested from us, including the ongoing administration of these products and services, maintaining accurate personal data and general policy servicing;
- manage your account and Policies held with us, including the processing of any claim, or if applicable, a withdrawal, you make under a Policy you hold with us, to handle any complaints raised and to respond to you when you contact us;
- notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Policy) from time to time;
- comply with our legal and regulatory obligations, including in relation to record keeping, regulatory reporting and the prevention, detection and mitigation of financial crime;
- assist us in determining whether you would be eligible to feature in a case study, building and creating that case study and to accommodate any particular requirements you might have in connection with your participation in a case study, including dietary requirements;
- establish, exercise or defend legal claims;
- manage our business operations, including conducting compliance monitoring, internal and external audits, accounting and other operational controls;

British Friendly Society Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Registration number 110013). A member of the Association of Financial Mutuals. The Society is incorporated under the Friendly Societies Act 1992. Registered No. 392F. Registered Office: 45 Bromham Road, Bedford MK40 2AA.

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- to review and improve our products and services, through quality assurance, call monitoring, research and staff training;
- comply with our statutory obligations and Society rules relating to Annual General Meetings (“AGMs”) and resolutions;
- identify and provide support to members with additional needs;
- where you have opted into receiving them, or where we otherwise have a legitimate interest, to send you marketing communications concerning our product and service offerings;
- to administer our discretionary services such as Mutual Benefits and BF Care; and
- administer incentive arrangements which you have opted in to, for example for completing a survey we have sent to you.

We process this information on the following grounds:

- because the processing is necessary for us to provide you with the product(s) or service(s) you (or your authorised intermediary acting on your behalf) have requested from us, including us carrying out any precontractual steps you (or your authorised intermediary acting on your behalf) have asked us to take. For example, checking your eligibility or suitability for a particular policy;
- because, in certain cases, you have consented to us processing your personal and (where applicable) special category information. For example:
 - to assess your eligibility for a product we provide;
 - to check your entitlement to receive payment or other benefit under the terms of your policy;
 - to provide you with appropriate and tailored support;
 - for marketing purposes; and
 - when you participate in case studies.

If you are a child under 16 then a parent or guardian will consent on your behalf;

- because it is necessary for us to carry out our contractual obligations under the terms of your Policy, this includes paying out your claim if it is eligible;
- because, in certain cases, the processing is necessary for us to comply with our legal obligations. For example, where regulations oblige us to keep records of our members' details or the details of policy quotes supplied to potential members, to manage our business operations, to conduct regulatory reporting, and to prevent and detect financial crime;
- because, in certain cases, the processing of your personal or special category information is necessary in order to protect your vital interests;
- additionally, in the case of special categories of information:
 - because the processing is necessary for the establishment, exercise or defence of a legal claim – for example, where there is a dispute or potential for a dispute between us;
 - because doing so is necessary to safeguard your economic wellbeing;
 - in order to prevent or detect unlawful acts and fraud;
 - in relation to an insurance policy applied for through your authorised intermediary on or after **11th June 2022**, for the purposes of arranging, underwriting, or administering your insurance policy or exercising a right, or complying with an obligation, arising in connection with an insurance contract, including a right or obligation arising under an enactment or rule of law in the

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substantial public interest. This includes where we share your information with a reinsurer; and

- because, in certain circumstances, we have a legitimate business interest in doing so.

Where we process your information for our legitimate interests, the interests relied on will standardly be:

- to provide you with information about the products and services we offer which we believe could be of interest;
- to help us better understand our members and improve customer service;
- to comply with our legal and regulatory obligations for the prevention and detection of, and otherwise to protect the Society from, financial crime;
- to improve and/or develop our business, products, and services, while enabling us to comply with our legal obligations;
- to defend and safeguard the business, members, employees, or relevant third parties from potential legal action;
- to comply with our legal and regulatory obligations for the ongoing administration of a policy;
- to keep our records up to date;
- to provide appropriate and tailored support to members; and
- to enable members realise the benefits of their membership.

Other Information we collect about you

We also collect non-personally identifying information which web browsers and servers typically make available. This includes technical information, such as your IP address, your login information and information about your visit, such as records of how you navigate the pages on our site and how you interact with the pages. For details on how we use cookies, please see our 'Cookies' section below.

We process this information to:

- to allow us to administer the account you hold with us;
- to ensure that content from our Website is presented in the most effective manner for you and for your device; and
- to collect anonymous statistical data to improve our services.

We process this information on the following grounds:

- because we have a legitimate business interest in maintaining, developing, and safeguarding the security of our website and available information in order to improve our service.

How long we keep your information for

We only keep your information for so long as it is reasonably necessary. Generally speaking, we retain your information for the following periods of time:

- if you (or a third party acting on your behalf) make an enquiry with us but you do not proceed with making an application, 2 years from the date of the enquiry;
- if you (or a third party acting on your behalf) make an application for one of our policies but that application is then withdrawn, 2 years following the date of withdrawal;

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- if you (or a third party acting on your behalf) make an application for one of our policies but your application is declined by us, 2 years following the decision date (or the date that decision is subsequently confirmed by our underwriting team, if applicable);
- if you (or a third party acting on your behalf) make a claim against a policy held with us, 6 years from the termination of your policy
- if you participate in a case study then we will keep your personal information for the duration that we continue to use that case study. This is usually no longer than 5 years. If you withdraw your consent at any time then your information will be kept for 2 years from the date you withdraw your consent. If you agree to participate in a case study that we decide not to progress, we will keep your information for 6 months from the day we decide not to proceed with that case study;
- if your active Policy is cancelled (by whatever means), 6 years after the date of termination; and
- where your Policy matures or expires, 6 years after the date of the later of: (1) the maturation/expiration; and (2) the settlement of all monies payable under the terms of the Policy.

These periods may be extended if, for example, there is a legal dispute concerning the terms of your Policy or your claim or if we are otherwise required by law to keep the information for a longer period. We will notify you if we need to extend the period for which we keep your information.

In certain cases, we may anonymise your information, along with the information of our other members, for record-keeping purposes, statistical analysis and to improve our business practices and computer systems. Once anonymised, you are no longer identifiable from the information we hold about you. This anonymised information can be kept indefinitely.

How we share your information

Your personal information is not shared with anyone except where we are required to do so to comply with the law, to protect our rights, to properly administer your policy (including processing a policy application or claim you have made) or (where applicable) to administer and distribute case studies.

To achieve this, we may share your personal information with the following people or groups of people:

- your authorised intermediary (if you have one);
- your doctor or nominated health professional(s);
- our reinsurer(s) – by reinsurer(s) we mean a party that provides reinsurance services to us in respect of risks we underwrite, including by taking on a proportion of the risks we insure. If you'd like further information on the reinsurers we may provide your personal information to and how this may be used, please contact us.
- if you are under 16 and you have signed your own data protection consent, your parent or guardian;
- when you provide us with your employment details, your employer (and any outsourced human resources or payroll function they might use);
- if you are a child, your school or education establishment;

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- on occasion, the Department of Work and Pensions should we need to verify your employment records;
- where you have an existing insurance policy in place to protect your income, your other insurance providers so that we can coordinate our collective liability;
- third party medical assessment and screening providers we partner with or our Chief Medical Officer (e.g. to conduct a telephone medical questionnaire with you);
- external investigators to verify the facts set out in your claim where we suspect fraud, other illegal activity or have concerns about the accuracy of information you have provided to us;
- when you provide us with payment details, your bank, your parent(s)/guardian(s) bank or your nominee(s) bank (as applicable);
- our third party marketing platform who facilitate our mailing lists;
- third parties we use to facilitate and deliver annual and other general meetings of the Society;
- our third party member screening provider to aid our compliance in regulatory and legal obligations;
- in relation to case studies, your information may be published on our website and included within, or referred to, in literature and communications and may be shared with other third parties, including photographers, videographers, journalists, PR consultants, external marketing agents and catering service providers;
- our external IT providers who host our IT systems. Typically, your personal information will be encrypted before it is transferred to our hosts but in certain circumstances they may require access to unencrypted data, for example when we need to troubleshoot an issue with your account on our computer system. Our IT providers are subject to strict contractual obligations to treat your personal information with the utmost sensitivity, to keep it confidential and to comply with data protection law at all times and;
- where we use a credit reference agency to validate your identity. This leaves a soft "footprint" on your credit file and is only visible to you.

Where we have not otherwise identified an appropriate lawful basis to share your information with third parties, we will only share your information where you have consented to us doing so in advance. If you do not consent to us processing certain information about you, such as your medical history, then we may not be able to process your requests.

We may share anonymised data (from which you cannot be identified) with contractors and other third parties for the purpose of improving our business practices and computer systems.

To the best of our knowledge, understanding and belief, your information will not be transferred outside of the United Kingdom or to any country which is not approved by an adequacy regulation of the UK government. If this changes then we will let you know.

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Automated decision making

The Society may use automated decision making to assess policy applications and claims.

To assess or administer policy applications or claims, we may use automated decision making. The automated decision making will allow an application or claim to be assessed, accepted, declined or referred.

You can object to us making automated decisions about you at any time. The contact details for doing so are set out at the end of this Privacy Policy.

If you are an adult, we may carry out automated decision making for marketing purposes. This is done to record your preferences and to create a personal profile which ensures you only receive marketing information from us which we think will interest you. You can object to us processing your personal information in this way at any time by contacting us using the details set out at the end of this Privacy Policy.

Your rights

Under data protection law you have the following rights:

- the right to be informed as to what we do with your information. This includes, but is not limited to, the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for;
- where we are processing your information on the grounds of your consent, you have the right to withdraw that consent at any time. Please note that that withdrawing your consent to us processing your personal or special category information may, depending on the circumstances, have the effect of withdrawing your claim or terminating your Policy (or policy application). Please contact us using the details set out at the end of this Privacy Policy or speak to your authorised intermediary if you would like to withdraw your consent. Please also note that:
 - the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;
 - any payments due under the terms of your Policy may still need to be paid and you will not usually be entitled to a refund of monies already paid; and
 - we may continue to process your information insofar as is necessary for establishing, exercising or defending a legal claim;
- the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in the 'Access to Information' section, below;
- in certain circumstances, the rights to request that we erase, rectify, cease processing and/or delete your information where the original purpose for which the data was collected has expired;
- in certain circumstances, the right to request copies of the information we hold about you in a machine readable format so that you can transfer it to other services;
- in certain circumstances, the right to object to processing of your information;

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- the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by taking the prescribed action and not opting in on the forms we use to collect your information, where applicable, clicking the unsubscribe link in marketing e-mails we send you, opting out of marketing communications by changing your account details through our Website or by contacting us using the details set out in the 'Contact' section, below;
- the right to object to decisions being made about you by automated means;
- the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.

You also have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied with our response) if you have any concerns about how we hold and process your information. Our contact details are set out at the end of the Privacy Policy. The Information Commissioner's Office website is www.ico.org.uk.

For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau (www.citizensadvice.org.uk) or the Information Commissioner's Office (www.ico.org.uk).

Access to information

Under data protection law you can exercise your right of access by making a request to receive copies of some of the information we hold on you.

You may be required to send us proof of your identity, or proof of authority if making the request on behalf of someone else before we can supply the information to you.

We will be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the information we hold about you if your request is clearly unfounded or excessive and in certain circumstances, you will be entitled to receive the information in a structured, commonly used and machine readable form.

Data security

If you choose or are provided with a user identification code, online account login, password or any other piece of information as part of our Website's security procedures, you must treat that information as confidential and you must not disclose it to any third party. The Society has the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in the Society's opinion you have failed to comply with any of the provisions of this Privacy Policy or our Website Terms and Conditions - visit <https://members.britishfriendly.com/terms-and-conditions/> if you're a member and <https://advisers.britishfriendly.com/terms-conditions/> if you're an adviser for more information.

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Unfortunately, the transmission of information via the internet is not completely secure. Although the Society will do its best to protect your personal information, it cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk.

Cookies

For information about how we use cookies on our website, please refer to our Cookies Policy at <https://members.britishfriendly.com/cookies/>.

Access to Medical Reports Act 1988 Consent

Please note that if you give consent for us to request a copy of your medical records in accordance with the Access to Medical Reports Act 1988, that consent is separate to the consent you may give us to process your information under data protection law.

If we cannot obtain your consent to obtain these records, then we may be unable to process your insurance policy application or a claim.

Further matters to consider

When you use the services of a third party, additional terms may apply and we may not be the data controller. We recommend reading the third party's terms and conditions and applicable privacy policy carefully before providing further personal information.

As we will not control or process any data you provide to the third party, should you wish to withdraw your consent for any processing of your data by the third party you will need to contact them in accordance with their privacy policy.

Changes to this Privacy Policy

Any changes made to this Privacy Policy in the future will be posted on the Website and, where appropriate, notified to you by e-mail. It is recommended that you visit this page from time to time to review any changes. This Privacy Policy was last updated on 28 April 2023 and is effective from 30 May 2023.

Contact

For questions, comments and requests regarding this Privacy Policy please contact us by e-mail to compliance@britishfriendly.com or by post to the Data Protection Officer, British Friendly Society, 45 Bromham Road, Bedford, MK40 2AA.