

## PRIVACY POLICY

### Intermediaries

Public

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This Privacy Policy gives you information about how the Society processes the personal information of intermediaries, their employees and consultants, and Appointed Representatives and their employees and consultants.

In this Privacy Policy, defined terms have the same meaning as given to them in our Intermediary Terms of Business, the latest version of which is available at <https://members.britishfriendly.com/privacy-policy/>

#### Who we are

The data controller with control of your personal information is British Friendly Society Limited of 45 Bromham Road, Bedford, MK40 2AA.

The Society's Data Protection Officer is Lauren Davison of British Friendly Society Limited of 45 Bromham Road, Bedford, MK40 2AA.

#### Information: Collection, Use and Grounds for Processing

##### Sources of information

The Society collects and processes information about you from a variety of sources. These are summarised below:

- (a) **information you provide to us** - this includes the contents of your Intermediary Application Form and where you supply us with personal information by other means (such as letter, email, phone call or by contacting us through our website *www.britishfriendly.com*) ("**Website**").
- (b) **information provided by a third party** - this includes where your firm provides us with your information (for example on an Intermediary Application Form or as a point of contact for us).
- (c) **Information obtained from public sources** - sometimes we might obtain information about you from public sources, such as the Financial Services Register.

The information about you which we hold may include your name, address, place of work, email address and phone number.

##### Purpose and grounds for processing

We process your personal information primarily to administer the contractual relationship between (i) the Society and your firm; and/or (ii) the Society and you.

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We carry out this processing on the grounds that it is necessary for us to perform our contract (for the payment of commission under our Intermediary Terms of Business) with your firm/you, including taking pre-contractual steps your firm/you have instructed us to take (for example, assessing your eligibility to become an intermediary for the Society).

We may also process your information for research and marketing purposes which allow us to improve our processes, systems, product range and to notify you of changes to the same. We do so because we have a legitimate business interest in improving our service offering. In accordance with Data Protection Law, we are satisfied that our legitimate business interest is not overridden by your interests or fundamental rights and freedoms.

Where we conduct direct marketing, we will do so on a legitimate business interest basis. Your marketing communication preferences can be updated from your Account section of the Website or by contacting us directly.

### **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:

- (a) if your intermediary application is unsuccessful or withdrawn, for 12 months from the date we notify you that it has been unsuccessful or you withdraw your application (whichever is applicable); or
- (b) if you become an intermediary of the Society, for 12 months from the date you cease to be an intermediary of the society or you cease to be an employee of or contractor for the Intermediary or Authorised Signatory.

These periods may be extended if, for example, there is a legal dispute between us or if we are otherwise required by law to retain the information for a longer period. We will notify you if we need to extend the period for which we retain your information.

In certain circumstances we may anonymise your information 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 is 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 or to properly administer the contract between us.

In order to achieve this purpose, we will share your personal information with:

- (a) third party underwriting platforms through which you submit policy applications, such as IRESS, iPipeline or Weblines:

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(b) 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 maintain its confidentiality and to comply with data protection law at all times; and

(c) relevant regulators, such as the Financial Conduct Authority (FCA).

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 European Economic Area (EEA) or to any country which is not approved by the European Commission. If this changes then we will let you know.

### Your Rights

Under data protection law you have the following rights:

(d) 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;

(e) 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;

(f) 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;

(g) 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;

(h) the right to object to processing of your information where it is likely to cause or is causing damage or distress;

(i) 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 checking certain boxes on the forms we use to collect your information, clicking the unsubscribe link in marketing emails 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;

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- (j) the right to object to decisions being made about you by automated means;
- (k) the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- (l) the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law.

### Access to Information

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

From 25 May 2018 you will:

- (a) 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
- (b) in certain circumstances, 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 the Terms and Conditions ([www.britishfriendly.com/terms](http://www.britishfriendly.com/terms)).

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.

### 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 email. It is recommended that you visit this page from time to time to review any changes. This Privacy Policy was last updated in March 2018.

### Contact

For questions, comments and requests regarding this Privacy Policy please contact us by email to [compliance@britishfriendly.com](mailto:compliance@britishfriendly.com) or by post to Lauren Davison, British Friendly Society, 45 Bromham Road, Bedford, MK40 2AA.