

PRIVACY POLICY

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What this Privacy Policy covers

This Privacy Policy gives you information about how British Friendly Society Limited (the "**Society**") treats personal information we receive and hold about you. Please read the following sections carefully to understand how your personal data will be used by the Society.

You are receiving this policy because we have been provided with your personal information in relation to the administration of one of our policies. This is because you fall into one or more of the following groups:

1. One of our members has elected for you to be their nominee under the terms of their policy with us.
2. You are the personal representative or executor of the estate of a deceased former member.
3. You are an attorney for one of our members under the terms of a power of attorney.

If you are also a member of ours (i.e. because you hold a policy with the Society) then our Main Privacy Policy will also apply to you. Our Main Privacy Policy can be accessed here: <https://members.britishfriendly.com/privacy-policy/>

The Society collects and uses your data in accordance with current data protection law (which includes, from 25 May 2018, the General Data Protection Regulation (Regulation (EU) 2016/679)) ("**data protection law**").

We will not use your information for marketing purposes unless you have opted in to receive marketing communications from us. However, if you are also a member of ours then you may receive marketing materials from us for that reason.

Who we are

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

The Society's Data Protection Officer is Reeshi Harania of 45 Bromham Road, Bedford, MK40 2AA.

Information: Collection, Use and Grounds for Processing

The Society may receive information about you from a variety of sources. The below sections summarise the sources of your information, how that information is used by the Society and what grounds we have for processing your information under data protection law:

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i. Information you give to us:

We will typically receive information from you directly where:

1. you are a nominee and have provided further information to us to allow us to administer the member's policy; or
2. you are a personal representative, executor or attorney and have notified us of your status and the circumstances of your appointment or other authority.

The information you give us may include (without limitation) your name, address, email address, phone number, date of birth, gender, personal description, relationship to the policyholder and bank details.

We process this information to:

- (a) supply you with information and assistance concerning the administration of a member's policy. This includes the processing and payment of any claim under that policy and administering the payment of any capital balance which might be due;
- (b) notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Policy) from time to time; and
- (c) comply with our record keeping and regulatory compliance obligations.

We process this information on the following grounds:

- (i) because the processing is necessary for us to provide the member with the products or service they have requested from us, including us carrying out any pre-contractual steps we have been asked to take or administering the member's account with us. This includes where we are contractually obliged to make distributions or payments out of policy funds in accordance with its terms;
- (ii) because the processing is necessary for the purposes of our legitimate interest of administering the member's account, including transferring claim monies or capital balances to the correct recipient of those funds. In accordance with data protection law, we have carefully weighed your interests and fundamental rights and freedoms against our interest to process your information and are satisfied that we are justified in processing your information for this purpose;
- (iii) because, in certain cases, you have consented to us processing your information for the above purposes; and
- (iv) because, in certain cases, the processing is necessary for us to comply with our legal or regulatory obligations.

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ii. Information provided by third parties:

These are circumstances where a third party sends us information about you. Examples of when this might occur include where:

1. a third party identifies you to us as being the member's attorney (under a power of attorney), personal representative or executor and provides us with your details so that we can contact you; or
2. in the case of a nominee, your details were provided to us by the policy applicant (or somebody acting on their behalf).

The information we receive about you from third parties may include (without limitation) your name, address, email address, phone number, date of birth, gender, personal description, relationship to the policyholder and bank details.

Sensitive data

Occasionally, we may also hold personal information about you which is of a sensitive nature, called "**special category**" information. This will typically be information about your health or genetics. This may occur when a policy applicant includes information about your health (because you are a close relative of theirs) on their policy application form. When this information is recorded on our system, we only store the family member's relationship to the applicant (e.g. 'mother'), the relation's medical condition (e.g. 'Type 1 diabetes') and their age bracket (e.g. '50 to 65'). You would not normally be personally identifiable from this information.

If, however, we hold your details for another reason (e.g. because you are a nominee under the terms of that policy) then you would be identifiable from those two sets of information combined. This is usually the only occasion (save where you are also a member of ours) where we will hold special category information about you.

We process information provided by third parties (including special category information referred to above) in order to:

- (a) provide the member with the products or service they have requested from us, including us carrying out any pre-contractual steps such as checking their eligibility for one of our policies or other services;
- (b) supply you with information and assistance concerning the administration of a member's policy;
- (c) notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Policy) from time to time; and
- (d) comply with our record keeping and regulatory compliance obligations.

We process this information on the following grounds:

- (i) because the processing is necessary for us to provide the member with the products or service they have requested from us, including us carrying out any

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pre-contractual steps we have been asked to take or administering the member's account with us;

- (ii) because, in certain cases, the processing is necessary for us to comply with our legal obligations; and
- (iii) in relation to special category data, because you have consented to the processing.

How long we keep your Information for

We only keep your information for so long as it is reasonably necessary. Generally speaking, we keep your information for 2 years from the date the member's policy is cancelled, expires or all monies due under the terms of the policy have been paid.

These periods may be extended if, for example, there is a legal dispute concerning the terms of the policy 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 retain your information.

In certain cases 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 relevant member's policy (including where you have instructed us to share your information with a third party).

We share your information with 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 an 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.

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

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Automated Decision Making

We do not currently carry out any automated decision making with your information. If this changes then we will notify you.

Your Rights

Under data protection law you have the following rights:

- (a) 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;
- (b) where we are processing your special category data (e.g. sensitive health information) on the grounds of your consent, you have the right to withdraw that consent at any time. Please note that:
 - (i) the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent; and
 - (ii) if a policy is being investigated for fraud or other illegal activity then we may continue to process your special category information insofar as is necessary for establishing or exercising a legal claim;
- (c) 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;
- (d) 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;
- (e) 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;
- (f) the right to object to processing of your information where it is likely to cause or is causing damage or distress;
- (g) the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data 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 data, clicking the unsubscribe link in marketing emails we send you, opting out of marketing communications by changing your account details through our website portal or by contacting us using the details set out in the 'Contact' section, below;
- (h) the right to object to decisions being made about you by automated means. We do not currently undertake automated decision making with your data;

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- (i) the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- (j) 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 by 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 this 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 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.

Changes to this Privacy Policy

Any changes made to this Privacy Policy in the future will be posted on our website (<https://members.britishfriendly.com/privacy-policy/>)

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 or by post to Reeshi Harania, British Friendly Society, 45 Bromham Road, Bedford, MK40 2AA.