

## PRIVACY POLICY

### Mutual Benefits

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#### What this Policy covers

This Policy sets out how your personal information is used and shared by British Friendly Society Limited (the "**Society**") when you sign up to the Society's Mutual Benefits programme ("**Mutual Benefits**"). This Policy supplements our Main Privacy Policy, the latest version of which is available here: <https://members.britishfriendly.com/privacy-policy/>

#### Source of Information

You can sign up for Mutual Benefits through your online account. You can also register for Mutual Benefits over the phone. Depending on how you sign up, you may be asked to confirm your name, email address, date of birth and policy number. We use this information to confirm that you are a member before granting access to the Mutual Benefits service.

We do not require any sensitive personal information (known as "**special category**" information) from you in order to register for Mutual Benefits.

#### Processing your Information

When you sign up for Mutual Benefits, we will continue to process your personal information in accordance with our Main Privacy Policy, the latest version of which is available here: <https://members.britishfriendly.com/privacy-policy/>

We will also use your personal information for the following additional purposes which are specific to the Mutual Benefits programme:

- (a) to administer your Mutual Benefits membership (for example, so that we can respond to queries about your membership); and
- (b) to allow our online benefits provider, Square Health Limited, to validate your access to the online Mutual Benefits portal. Further information about this arrangement is set out in the next section of this Policy.

We process your information in this way because:

- (i) it is necessary for us to carry out our contractual obligations under the terms of the Mutual Benefits service;

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- (ii) we have a legitimate business interest in ensuring that only members of the British Friendly are entitled to access the Society's members' benefits portal. In compliance with data protection law, we are satisfied that our interest in doing so is not overridden by your interests or fundamental rights and freedoms; and
- (iii) in certain circumstances, you have consented to us processing your personal information in this way.

### How we share your Information

When you register for Mutual Benefits, we share your title, full name and date of birth with Square Health Limited, whose registered office is Crown House, William Street, Windsor, Berkshire, SL4 1AT ("**Square Health**"). Using this information, Square Health grants you online access to a range of services for Mutual Benefits members. These include, for example, telephone counselling and a virtual GP service.

Under data protection law, when we share your information to Square Health, Square Health acts as our data processor and we (British Friendly Society Limited of 45 Bromham Road, Bedford, MK40 2AA) are the data controller. Square Health is 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.

When you use one of the services provided by Square Health, additional terms may apply. We recommend reading Square Health's terms and conditions and relevant privacy policy carefully before providing further personal information.

We also 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 information, 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.

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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### How long we keep your Information for

We only keep your information for so long as reasonably necessary. Generally speaking, we keep your information on our Mutual Benefit system until one month from the date your Mutual Benefits membership is cancelled.

This period may be extended if, for example, there is a legal dispute between us 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 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.

### Automated Decision Making

We do not use your personal information for automated decision making purposes when you register for Mutual Benefits. Should this ever change then we will let you know.

### Your Rights

When you register for Mutual Benefits, your rights under data protection law do not materially change. Accordingly, full details of your rights are set out in full in our Main Privacy Policy, the latest version of which can be access at <https://members.britishfriendly.com/privacy-policy/>.

However, please note the following. Where we are processing your information on the grounds of your consent, you have the right to withdraw that consent at any time. If you do so, however, we may be unable to notify Square Health of your entitlement to access certain online-only services of Mutual Benefits. This means that these online-only services may cease to be available to you. Please contact us using the details set out at the end of this Policy if you would like to withdraw your consent.

Please also note that:

- (a) the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent; and
- (b) if your claim is being investigated for fraud then we may continue to process your special category information insofar as is necessary for establishing or exercising a legal claim.

### Changes to this Privacy Policy

Any changes made to this supplemental Policy in the future will be posted on our 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.

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### Contact

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