

PRIVACY POLICY

Faces of British Friendly

Public

British Friendly Society Limited (the "**Society**") is asking for its members and their families to volunteer to appear in advertising materials to help raise awareness of the Society and its services. This notice sets out how your personal information is used if you, or a child for whom you are responsible, volunteers to take part in the 'Faces of British Friendly' campaign (the "**Campaign**").

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) ("**data protection law**").

Under data protection law, the Society is the data controller with control of your personal information. The Society's Data Protection Officer is Lauren Davison of 45 Bromham Road, Bedford, MK40 2AA.

How is my Information used?

When you apply to participate in the Campaign, we request personal information from you which includes your name, gender, age, occupation, address and signature. This information is used to process your application, including contacting you if we would like to feature you in the Campaign.

You will also be asked to provide us with personal information about your motivation for joining the Campaign, your hobbies and your travel arrangements. You will also be asked to provide a photograph of yourself. This information is used by our marketing team to select who to use in the Campaign. Information about your hobbies and motivations may also be used in the Campaign itself, e.g. as a subtitle to your photograph explaining an interesting fact about you.

You will also be asked to provide details of any special dietary requirements (e.g. a food allergy). If you are chosen to participate in the Campaign, this information is shared with our caterers to ensure your safety. Under data protection law, this information may be classified as sensitive personal information (called "**special category**" information). This is because it can relate to your health or religious beliefs. You will be asked to consent to us processing this special category information.

If you are a parent or guardian of a child who is applying to feature in the Campaign then, in addition to the child's information, we will also process your name and signature. If you are a member of the Society and your relative is applying to participate in the Campaign then we will process your name as well.

If you are chosen to participate in the Campaign then we will invite you to a photoshoot and our photographer will take a series of photographs of you. The

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photographs are then shared with our marketing team and may be used publicly in the Campaign.

Bases for Processing your Information

We process the information you provide to us (including photographs) on the basis of your consent. If you are under the age of 16 then that consent will have been given by your parent or guardian. You can retract your consent at any time and further information on how to do this is set out in the 'Your Rights' section, below.

In certain circumstances we may also process your information because:

- (i) it is necessary for us to comply with our legal obligations; or
- (ii) there is a dispute or potential for a dispute between us and the processing of your personal information is necessary for the establishment, exercise or defence of a legal claim.

How long we keep your Information for

We only keep your information for so long as it is reasonably necessary. Generally speaking, this means:

- (a) if you are not chosen to participate in the Campaign then your personal information will be kept for 6 months from the day we receive it before being securely destroyed;
- (b) if you participate in the Campaign then we will keep your personal information for the duration that we continue to use your Campaign photographs. This is usually no longer than 5 years; and
- (c) if you withdraw your consent at any time or subsequently decide not to be involved in the Campaign then your information will be kept for 2 years from the date you withdraw.

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

Please be aware that once the Campaign materials are released, they cannot be withdrawn from circulation if you subsequently withdraw your consent.

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 run the Campaign. In order to achieve these aims, we will usually share your personal information with the following people or groups of people:

- (a) our marketing team and photographers;

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- (b) external marketing agents who will work on and publish the Campaign;
- (c) (in the case of special category information relating to your dietary requirements) our caterers; and
- (d) 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 to troubleshoot an issue with our system.

All external agencies we use 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. To the best of our knowledge, understanding and belief (and excluding social media) 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.

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) Please note that 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 then we will cease processing your application or, if you have already been selected to participate, cease using your personal information in the Campaign. You can contact us using the details set out at the end of this Notice. If you would like to withdraw your consent but please note the following:
 - (i) the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent (i.e. we will not have to recall marketing materials which have already been circulated); and
 - (ii) we may continue to process your personal information where there is (or there is the potential to be) a legal dispute between us.
- (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;

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- (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 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 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;
- (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 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 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.

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Changes to this Privacy Notice

Any changes made to this Privacy Policy in the future will be notified to you by e-mail. This Privacy Notice 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 Lauren Davison, British Friendly Society, 45 Bromham Road, Bedford, MK40 2AA.