

## National Friendly Privacy Notice

This Privacy Notice explains how National Deposit Friendly Society trading as National Friendly uses and protects any information that you give us by which you can be identified or are identifiable ("Personal Information" or "Personal Data") when you use our Services.

This Privacy Notice applies when you request a quotation, apply for one of our insurance products, use our website or member portal, or when we administer your insurance policy, including collecting premiums and processing claims. These activities are collectively referred to as the "Services."

We are committed to ensuring that your privacy and your Personal Information are protected. If we ask you to provide certain Personal Information when using our services, then you can be assured that it will only be used in accordance with this privacy notice.

### Who are we?

National Friendly is a trading name of National Deposit Friendly Society Limited. Registered office: 11-12 Queen Square, Bristol BS1 4NT. Registered in England and Wales no. 369F.

National Deposit Friendly Society Limited is authorised and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. National Deposit Friendly Society Limited is covered by the Financial Services Compensation Scheme and Financial Ombudsman Service.

National Deposit Friendly Society Limited is registered as a data controller with the Information Commissioner's Office (ICO) in the UK under the number Z5479601.

### For what purpose will Personal Information be collected, and how is it collected?

#### Personal Information provided by you

We need to collect Personal Information from you so that we can provide and you can receive our Services in relation to the policy that we have entered into, for example when You apply for one of our products or make a claim. However, you should be aware that we will also process your Personal Information to comply with a legal obligation (amongst others) or where we have a legitimate business objective (such as ensuring that we deliver our Services and develop our products in a way that meets our customers' needs). However, we will take all reasonable steps to ensure that we only collect the minimum Personal Information that is necessary to achieve this objective and will not use it for any other purpose not envisaged in this Privacy Notice or as otherwise notified to you. If we do not collect your Personal Information, it will severely restrict our ability to provide our Services to you.

Your Personal Information will be collected in a variety of ways, for example, by use of our website, completion of an application form, or completion of a claim form and sent by various methods including by post, email and by telephone.

The Personal Information you provide to us will include:

- Basic personal identifiers, including (but not limited to) your name, address, email address, bank account details, and date of birth.
- Additional lifestyle information, for example relating to your hobbies or occupation.
- Sensitive Personal Information (also known as Special Category Data), including health information, for the purpose of arranging, underwriting, administering your policy, administering a claim, and complying with an obligation under your insurance contract. Where we collect special category personal data from you, we will only request the information required for the specific purpose in accordance with the Data Protection Act 2018 Schedule 1 Part 2 Substantial Public Interest Conditions.
- Information on family members of a nature listed above, when they are entitled to the Services We provide. Where applicable, please ensure that the family members have had sight of this Privacy Notice.

### **Information from other sources**

We may also acquire your Personal Information from third-party companies who operate in accordance with UK data protection legislation. We will only take receipt of such Personal Information where you will have already submitted your Personal Information to these companies and have specifically given permission to allow them to pass it on to other companies that provide similar or complementary products and services to us. We may also obtain information from credit agencies, public sources, social media, and similar online resources.

### **Information We collect through our website ('cookies')**

We collect certain types of information from your web browser via 'cookies' when You use our website. To find out more information please refer to [\*\*Our Cookie Policy\*\*](#).

### **Providing information on behalf of another**

If you are required to provide the personal information of another person connected with your policy, you should ensure that those individuals are made aware that you will be providing their personal information to us, provide them with a copy of this Notice, and ensure that they are happy for their personal information to be disclosed to us and processed in accordance with this Notice.

### **Parents, guardians, and sponsors**

If you are a parent, guardian or sponsor of a child policyholder or a child policy applicant then this Privacy Notice, unless otherwise stated, applies to your personal information and to the personal information about the child.

## How your Personal Information is used

We will need to use your Personal Information so we can provide you with our services. This will be done lawfully, fairly and in a transparent manner. The below table sets out our purposes for processing your personal information and the lawful basis for doing so.

### What is the purpose and lawful basis for storing and using your personal data?

| Purpose of Processing                                                                                                                           | Lawful Basis                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Setting up your policy                                                                                                                          | To undertake our contracts of insurance         |
| Sending your statements                                                                                                                         | To undertake our contracts of insurance         |
| Collecting premiums                                                                                                                             | To undertake our contracts of insurance         |
| Paying maturities and claims                                                                                                                    | To undertake our contracts of insurance         |
| We have an obligation to process certain information for anti-money laundering purposes in relation to Part 7 of the Proceeds of Crime Act 2002 | To comply with legal and regulatory obligations |
| Analysing sales performance and identifying trends                                                                                              | To meet our legitimate interests                |
| Developing new products                                                                                                                         | To meet our legitimate interests                |
| Customer profiling                                                                                                                              | To meet our legitimate interests                |
| Performing business functions such as preventing fraud, and to help others prevent fraud                                                        | To meet our legitimate interests                |
| Auditing our records                                                                                                                            | To meet our legitimate interests                |
| Communicating and co-operating with others that play a role in providing your policy and conducting legal proceedings                           | To meet our legitimate interests                |
| Experience analysis                                                                                                                             | To meet our legitimate interests                |
| Pricing future new products and Re-pricing/premium reviews for existing products                                                                | To meet our legitimate interests                |
| Statistical purposes                                                                                                                            | To meet our legitimate interests                |
| Supporting/validating previous valuation results and other calculations                                                                         | To meet our legitimate interests                |

|                                             |                                                                                                            |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------|
| To send you direct marketing communications | To meet our legitimate interests<br><br>You can opt out of receiving marketing communications at any time. |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------|

This list is not necessarily exhaustive as changing business needs or external factors may influence the use of the information we hold. Should there be a need to use Personal Information for other reasons, we will update this Notice.

## Opting out of Marketing Communications

You can update your marketing preferences at any time by visiting [nationalfriendly.co.uk/marketing-preferences](https://nationalfriendly.co.uk/marketing-preferences). You can also do this by calling, emailing, or writing to us, our contact details can be found at the end of this notice.

## Sharing your Personal Information

We may need to send Personal Information to other firms in connection with our Services, including the following:

- Third party administrators
- Join Data Controllers
- Our banks, payment providers, and similar financial institutions
- Delivery or courier services
- Credit reference agencies
- Legal or regulatory organisations such as the FCA, PRA and ICO where we are required to do so by law.
- Our legal advisers in connection with obtaining legal advice or pursuing a claim.
- Your appointed insurance Intermediary or Independent Financial Advisor.
- Other insurers where you have an existing insurance policy in place so that we can coordinate our collective liability.
- Law enforcement agencies and fraud prevention agencies If we are required to provide details for an investigation.
- Your doctor or nominated Health Professional to assist with your claim.
- External Auditors to Audit the annual accounts.

If you would like to see the list of organisations with whom we share your data, please request the **Data Sharing List** for further information.

In each case, we will only share the personal information necessary to conduct their work and will do so subject to appropriate safety measures that are designed to ensure your personal information remains secure and is only used for the intended purpose.

## Joint Data Controllers

The below listed companies are also data controllers because they enable the management of your policy. They hold data on your premiums and claims history for analytical purposes and to set future premiums.

| Role      | Company Name                      | Address                                                               | Link to Privacy Notice                                                                                                                                        |
|-----------|-----------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Reinsurer | General Reinsurance               | London Branch,<br>Corn Exchange, 55<br>Mark Lane,<br>London, EC3R 7NE | <a href="https://genre.com/int/aboutus/privacy-at-genre">genre.com/int/aboutus/privacy-at-genre</a>                                                           |
| Reinsurer | Munich Re<br>Automation Solutions | 10 Fenchurch<br>Avenue, London,<br>EC3M 5BN                           | <a href="https://munichre.com/automation-solutions/en/general/privacy-statement.html">munichre.com/automation-solutions/en/general/privacy-statement.html</a> |
| Reinsurer | Hannover Rück SE                  | Karl-Wiechert-<br>Allee, 50, 30625<br>Hannover,<br>Germany            | <a href="https://hannover-re.com/182774/data-privacy">hannover-re.com/182774/data-privacy</a>                                                                 |

## How do we store Information and how is it protected?

We will keep your personal information up-to-date and store it securely on internal systems that can only be accessed by authorised members of staff. We will put appropriate technical measures in place to protect it from loss, misuse, unauthorised access, and disclosure, and not collect or retain excessive amounts of personal information.

We control logical system access through standard username and password controls across multiple systems. To protect against account misuse, we have automatic account locking on failed login attempts with near real-time reporting to the IT admin team and the input of a network administrator needed to re-enable access to the locked account.

The Personal Information that we collect from you may be transferred to, or processed or stored in any country, including those outside the European Economic Area. To ensure we meet our obligation to adequately protect Personal Information We will:

- Ensure the purposes and processing associated with any such transfer will comply with all applicable data protection regulations in the UK and EU.
- Ensure that any parties to whom we pass your information agrees to treat your Personal Information with the same level of protection as required by the data protection regulations in the UK and EU. You can contact us for more information about the specific protections in place in relation to any such transfer.

By submitting your Personal Information to us, you acknowledge that your Personal Information will be transferred, stored, or processed as explained within this Privacy Notice.

## **How long do we keep your Personal Information?**

National Friendly will only keep your personal information for as long as it is necessary to comply with applicable laws.

Please request a copy of our data retention schedule if you would like to see our full retention periods.

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

When your personal information is no longer required, we will:

- Erase or anonymise your personal information; or
- Archive your data so that it is beyond use.

## **Keeping Your Personal Information up to date**

Please let us know if your Personal Information changes as it is important that the information we hold about you is accurate and up to date. We will not be responsible for any errors or Personal Information losses as a result of us not being informed of a change in Personal Information.

## **Your rights regarding Personal Information**

You have a legal right to:

- request a copy of your personal data.
- request erasure of your personal data or to restrict processing in accordance with data protection laws. We may need to retain some or all of your personal data to provide you with our Services or for legal and regulatory purposes.
- request that your data is corrected where it is wrong.
- request that we suspend the processing of your personal data, for example if you want us to establish whether it is accurate or the reason for processing it.
- object to the processing of your personal data in certain circumstances.
- object to direct marketing. Where National Friendly uses your data to send you marketing communications, you have the right to withdraw your consent at any time.
- request your personal information to be transferred to another organisation.
- complain to the Information Commissioner's Office if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. If the request is deemed complex, we may extend this time limit by a further two months.

## **Changes to Our Privacy Notice**

We will review and amend this Privacy Notice periodically. When this notice is amended, it will be made available on our website.

We will not usually inform you directly if this notice changes unless these changes are likely to have a negative impact on your Data Protection rights.

## Contact Details

If you have any questions, queries, or wish to exercise your personal data rights, please in the first instance contact the Data Protection Officer at:

Data Privacy  
National Friendly  
11-12 Queen Square  
Bristol  
BS1 4NT

Or email [\*\*dpo@nationalfriendly.co.uk\*\*](mailto:dpo@nationalfriendly.co.uk)

You can also download a data subject rights request form from our website – [\*\*nationalfriendly.co.uk/contact-us\*\*](https://nationalfriendly.co.uk/contact-us)

You can contact the Information Commissioner's Office (ICO) on 0303 123 1113, online at [\*\*ico.org.uk/global/contact-us\*\*](https://ico.org.uk/global/contact-us) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## Complaints

If you wish to make a complaint about how we have managed your personal data, please email us at [\*\*dpo@nationalfriendly.co.uk\*\*](mailto:dpo@nationalfriendly.co.uk).

We aim to respond to your complaint within 30 days, however if it is a complex matter this may take longer, we will inform you if this is the case and provide an estimated resolution date.

If you are not satisfied with how we have managed your complaint, you can complain directly to the Information Commissioner's Officer (ICO) at [\*\*https://ico.org.uk/make-a-complaint/\*\*](https://ico.org.uk/make-a-complaint/).