

National Friendly Intermediary 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 apply for an agency to sell our insurance products, as well as the use of our website and broker portal, collectively known as "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 Commissioners 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 Contract you have entered into, for example to make commission payments. 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 intermediaries and member's 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 completion of an Intermediary Application Form and use of our website and broker portal. We may also collect personal information which you have provided by telephone, email and writing.

Information from other sources

We may acquire your Personal Information from other sources, such as your firm Principal, Appointed Representatives of your firm, as well as public sources including the Financial Services Register. We may also acquire your personal information from other insurers for the purposes of fraud prevention.

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 agency, 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.

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 agency and providing access to our broker portal	To undertake our Contract with you
Sending your statements	To undertake our Contract with you
Making commission payments	To undertake our Contract with you
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
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 administering your agency and conducting legal proceedings	To meet our legitimate interests
Experience analysis	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 marketing communications	To meet our legitimate interests (unless you have opted-out)

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.

You can update your marketing preferences at any time by visiting www.nationalfriendly.co.uk/member/marketing-preferences. You can also do this by calling us on 0333 014 6244 or emailing us at info@nationalfriendly.co.uk.

Sharing your Personal Information

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

- External IT providers who host our virtual servers and data
- Third party administrator(s) who administer our policy administration system
- External auditors to audit our annual accounts
- Other regulated financial Institutions for the purposes of fraud prevention and debt recovery
- Sales platforms through which you have submitted an application, such as IRESS and iPipeline
- Regulatory and law enforcement agencies where we are required to do so by law
- Where you have given your consent for marketing communications, third party marketing agencies who administer our digital marketing campaigns

In each case, we will only share personal information needed to carry out 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.

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.

We will store your personal data throughout the lifetime of your agency with us and for a period of up to 6 years once you cease to have any agency.

These periods may be extended in certain circumstance, including if we are required by law to retain the information for a longer period, or if there is a legal dispute between you and us.

Keeping 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 because of not being informed of a change in Personal Information.

Automated decision making

We may also use your Personal Information to automate some decision-making processes. We will inform you when decisions are made by this process, and you will have the right to ask for the decision to be reviewed in person, for example by having the option of referring a decision to an underwriter.

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 to keep a record that we have done so)
- 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 collects your consent 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.

Changes to Our Privacy Notice

We will review and amend this Privacy Notice periodically. When this notice is amended, we will not usually inform you of the changes we make, unless these changes are likely to have a material impact on your Data Protection rights.

Contact Details

If you have any questions, queries or complaints, and 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

You can also download a data subject rights request form from our website – www.nationalfriendly.co.uk/contact-us

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