

## Protection Privacy Notice

### Contents of this Notice

This Notice provides you with the necessary information regarding your rights and obligations and explains how, why and when we collect your personal data.

The Notice details the following:

- who we are;
- what personal data we collect about you, the policyholder, the payer if different from the policyholder and the proposer if the policy is for a member under 18 years old;
- what to do if you are providing data on behalf of another;
- what special category data we collect;
- how we collect personal data about you;
- our lawful basis for holding and processing the personal data we hold;
- any third parties with whom we share personal data we collect about you;
- how we store the personal data we collect and how it is protected;
- how long we retain the personal data we collect and our basis for destroying the personal data;
- your rights around your personal data;
- who are the data controllers;
- our process for the transfer of personal data outside of the European Economic Area (EEA);
- our contact details.

### 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 by the Prudential Regulation Authority 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 Friendly is registered as a data controller of the ICO in the UK under the number **Z5479601**.

## **What personal information may we collect about you?**

Personal data is any information that relates to a living individual who can be identified from that data and this includes information about you that you give to us by filling in forms or by communication with us, whether face-to-face, by phone or email; during your membership of National Friendly; and when you apply for benefits. The personal data we collect includes:

- name;
- address;
- telephone number;
- email address;
- passport;
- driving licence;
- utility bill;
- National Insurance Number;
- taxation numbers;
- date of birth;
- your signature;
- sort code;
- account number;
- marketing preferences;
- marital status;
- firearms licence;

## **Providing data on behalf of another**

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

## **Special category data**

Information you give us might also include "special categories" of more sensitive personal information. This could include information about your health and genetics which we need to consider when determining your eligibility or suitability for our policies.

Special categories of personal data that we collect are:

- any medical condition you've had in the last 5 years if you are completing a Full Medical Underwriting application form;
- any medical condition you've had in the last 2 years if you are completing a Continued Personal Medical Exclusion application form;
- any medical condition you've had in the past when processing a claim;
- gender;
- race or ethnic origin;
- biometric data;
- anti-fraud information;
- death certificate.

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.

## **Website browsing data**

We also collect non-personally identifying information which web browsers and servers typically make available. This includes technical information, such as your IP address, your login information and information about your visit, such as records of how you navigate the pages on our site and how you interact with the pages. For details on how we use cookies, please see our Cookie Policy on our website – [www.nationalfriendly.co.uk/policies/cookie-policy/](http://www.nationalfriendly.co.uk/policies/cookie-policy/)

## **How do we collect and use your personal data?**

If you contact us or apply for a policy we will collect personal data about you and other people connected to you. We will collect your data if you obtain a quote or submit an application online, or if you call us to discuss applications or existing policies. We may also collect your data from third parties. Examples of when this might occur include where:

1. you consent to your doctor or another medical professional providing us with your medical records or information from them;
2. your authorised intermediary makes a policy application on your behalf and provides us with information about you as part of the application process;
3. we need to undertake an identity check with a credit reference agency;
4. we receive a report of suspected fraudulent activity from our claims administrator;
5. we receive a high risk/PEP alert;
6. we need to request information from third parties such as our claims administrator, your GP and our Actuarial team in order to process your policy exit;
7. we purchase data from a data house for the purpose of marketing campaigns;
8. we purchase data from a lead provider for the purposes of telesales.

The information we receive about you from third parties may include any of the aforementioned personally identifiable data and special category data. If you provide us with personal data of people who benefit from the policy, we will treat this in the same way. It is your responsibility to tell the individuals and if they have any questions about this, please refer them to this Notice.

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

<b>Purpose of processing</b>	<b>Lawful basis</b>
Providing you with a quote	To undertake our contracts of insurance
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 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
Analyzing 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	To meet our legitimate interests
Helping 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	To meet our legitimate interests
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 marketing communications	Where you have given your explicit consent

We will not collect and use personal data for purposes beyond our lawful basis except where we have your consent or notified you of the relevant legal basis for processing.

### **Sharing your personal data**

We may share your personal data with organisations that help us to carry out our duties under your policy including:

- data processors;
- data controllers;
- third party claim management companies;
- regulators.

If you would like to see the individual companies with whom we share your data please request the [data sharing list](#) for further information. Our contacts details can be found at the end of the Privacy Notice.

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

### **How do we store data and how is it protected?**

We will keep your personal data 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 data.

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.

## **How long do we keep your personal data?**

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 data is no longer required we will:

- erase your personal information; or
- archive your data so that it is beyond use

## **Your rights around your personal data**

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;
- 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;
- 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.

If you would like to exercise any of these rights please write, call or email us using the contact details at the end of this notice.

In the event that you choose to exercise any of your rights in respect of data protection law (as outlined above) we will review your request and engage with any other relevant Data Controller in order to deal with your request in a manner that we consider the most appropriate.

### **Other Data Controllers**

Our intermediaries, Right to Health and Health Insurance Specialists are controllers of your data because they collect your data when you quote or apply for the Right to Health Cover or THIS Health Cover protection policy.

Our reinsurer, General Reinsurance, is also a data controller 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.

<b>Role</b>	<b>Company Name</b>	<b>Address</b>	<b>Privacy Notice</b>
Intermediary	Right to Health	Right to Health Ltd, Crown House, Home Gardens, Dartford, Kent, DA1 1DZ	<a href="https://righttohealth.co.uk/privacy-notice/">https://righttohealth.co.uk/privacy-notice/</a>
Intermediary	Health Insurance Specialists	Oakhurst House, 77 Mount Ephraim, Tunbridge Wells, Kent, TN4 8BS	<a href="https://healthinsurancespecialists.co.uk/privacy-policy">https://healthinsurancespecialists.co.uk/privacy-policy</a>
Reinsurer	General Reinsurance	London Brance, Corn Exchange, 55 Mark Lane, London, EC3R 7NE	<a href="http://www.genre.com/aboutus/privacy-at-genre">http://www.genre.com/aboutus/privacy-at-genre</a>



## Contact details

The web address is where they retain their own Privacy Notice, including details of the data they hold, how that data is used and the legal basis upon which they hold that data.

For members to fully understand how and where their data is used, it is recommended that you should visit the above sites and review their Privacy Notice.

## Transfer of data abroad

Personal identifiable information and special category data that you disclose to us which allows us to set up and manage your policy including claims management is transferred outside the European Economic Area. However, the recipient location of Switzerland is subject to a positive adequacy finding decision of the European Commission details of which can be found at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

## 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](mailto:dpo@nationalfriendly.co.uk)

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

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

## Protection Privacy Notice

### Data Sharing List

<b>Data controller*</b>	<b>Processing activities</b>
Reinsurer, General Reinsurance	To enable the management of your policy. They may also use such information for statistical and modelling purposes, compensation queries, quotations and morbidity.
Right to Health, Health Insurance Specialists and Assured Futures	To provide you with your insurance policy.

*\* The data controller determines the purposes and means of processing personal data.*

<b>Data processor*</b>	<b>Processing activities</b>	<b>Data sharing</b>
AXA Health	Our claims administrator to process and pay claims	<ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Policy number</li><li>• Member reference</li><li>• Phone numbers</li><li>• Email address</li><li>• Bank details (account name, account number, sort code)</li><li>• Date of birth</li><li>• Cover level</li></ul> <p>Special Category Data</p> <ul style="list-style-type: none"><li>• Health information</li><li>• Child details</li></ul>

Progressive Advantage Ltd	Administer our customer relationship management (CRM) system.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Date of birth</li> <li>• Email address</li> <li>• Phone numbers</li> <li>• Marital status</li> <li>• Gender</li> <li>• Age</li> <li>• Child details</li> <li>• Health Information</li> <li>• Bank details: account name, account number, sort code</li> <li>• Passport</li> <li>• Driving Licence</li> <li>• Firearms Licence</li> <li>• Birth Certificate</li> <li>• Utility bill</li> </ul>
Force24	Administer the system National Friendly uses to send digital marketing campaigns.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Date of birth</li> <li>• Email address</li> <li>• Phone numbers</li> <li>• Marital status</li> <li>• Gender</li> <li>• Age</li> </ul>
Mailing houses	To process marketing campaigns, providing you have consented to receiving marketing communications.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Date of birth</li> <li>• Email address</li> <li>• Phone numbers</li> <li>• Marital status</li> </ul>
APT	To process BACS payments.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Plan number</li> <li>• Bank details: account name, account number, sort code</li> </ul>

		<p>N.B for children:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Plan number</li> <li>• Bank details: account name, account number, sort code</li> </ul>
Actuarial consultancy firm, OAC.	For model development purposes.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Policy number</li> <li>• Date of birth</li> <li>• Member reference</li> <li>• Postcode</li> <li>• Address</li> <li>• Age</li> <li>• Marital status</li> <li>• Bank details</li> </ul> <p>Special Category Data:</p> <ul style="list-style-type: none"> <li>• Health/medical information</li> <li>• Gender</li> <li>• Smoker status</li> </ul>
File Centre	Our external storage company may store your original application form, previous certificate of insurance and any other notes regarding the initial set up of your policy.	<ul style="list-style-type: none"> <li>• Name – member, claimant, mentioned in will</li> <li>• Address – member, claimant, mentioned in will</li> <li>• Date of birth – member, claimant</li> <li>• Bank details: account name, account number, sort code – member, claimant</li> <li>• Member reference – member, claimant</li> <li>• Passport – member, claimant</li> <li>• Driving licence – member, claimant</li> </ul>

		<ul style="list-style-type: none"> <li>• Firearms licence – member, claimant</li> <li>• Birth certificate – member – member, claimant</li> <li>• Utility bill</li> </ul> <p>Special Category Data:</p> <ul style="list-style-type: none"> <li>• Death certificate – member</li> <li>• Health information – member</li> <li>• Gender – member, claimant</li> <li>• Child details</li> </ul>
Civica	To process our invitations and proxy voting forms for the Annual General Meeting.	<ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address</li> <li>• Phone numbers</li> </ul>

<b>Regulators</b>	<b>Processing activities</b>
Third parties	Who require your data to process a complaint, such as the Financial Ombudsman.
Law enforcement agencies and fraud prevention agencies	Where National Friendly are required to do so by law.
Regulatory authorities such as ICO, PRA and FCA	If we are required to provide details for an investigation.

<b>Third parties</b>	<b>Processing activities</b>
Other insurers	Where you have an existing insurance policy in place so that we can coordinate our collective liability.

Your doctor or nominated health professional(s)	To assist with any required treatment.
EY auditors	Audit the annual accounts.
Internal auditors, Mazars LLP.	Audit our processes.
Intermediaries	Any intermediary or agent appointed to act on your behalf.