

## PRIVACY NOTICE

### Contents

1.	What this Privacy Notice covers	2
2.	Who we are	2
3.	Intermediaries	2
4.	Parents, Guardians and Sponsors	2
5.	Information: Collection, Use and Grounds for Processing	2
	i) Information you give to us	
	ii) Information provided by Third Parties	
	iii) Information we collect about you	
6.	How long we keep your Information for	5
7.	How we share your Information	5
8.	Automated decision-making	6
9.	Your Rights	6
10.	Access to Information	7
11.	Data Security	7
12.	Access to Medical Reports Act 1988 Consent	7
13.	Changes to this Privacy Notice	7
14.	Data Protection Administrator	7

## **1. What this Privacy Notice covers**

This Privacy Notice gives you information about how Wiltshire Friendly Society Limited (the "Society") treats personal information we receive about you. We want to give you the best standard of service we can and we are serious about protecting your personal information.

Please read the following sections carefully to understand how your personal information will be used and handled by the Society.

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 (Regulation (EU) 2016/679)) ("data protection law").

## **2. Who we are**

The data controller with control of your personal information is Wiltshire Friendly Society Limited of Holloway House, Epsom Square, White Horse Business Park, Trowbridge, BA14 0XG.

The Society's Data Protection Administrator is Lee Davis of Holloway House, Epsom Square, White Horse Business Park, Trowbridge, BA14 0XG.

Our Website may, from time to time, contain links to and from the websites of the Society's partner networks, advertisers and affiliates. Please note that those websites will have their own privacy policies and the Society does not accept any responsibility or liability for such policies/websites. Please check these other policies before submitting personal information to those websites.

## **3. Intermediaries**

If you are an intermediary acting for an individual and you provide that individual's personal information to us via post, over the phone or by other means then you warrant and confirm that you are supplying their information in accordance with data protection law and that you have first drawn their attention to this Privacy Notice.

If you are an individual and a third party (e.g. your independent financial adviser) is authorised to supply your personal information to us in accordance with data protection law then this Privacy Notice refers to that third party as an "authorised intermediary".

For the avoidance of doubt, the terms of this Privacy Notice concern the relationship between the Society and you, not the relationship between your authorised intermediary and you. If you have any questions about how your authorised intermediary processes your personal information, please speak to them directly.

## **4. Parents, Guardians and Sponsors**

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

## **5. Information: Collection, Use and Grounds for Processing**

The Society collects and processes information about you from a variety of sources. These are summarised below:

### **i. Information you give to us:**

This includes information about yourself which you provide to us by paper application form, enquiry letter, email, phone call or by contacting us through any email address on our Website.

The information you give us may include (but is not limited to) your name, address, email address, phone number, date of birth, gender, personal description and bank details.

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

**We process this information to:**

- a) supply you with details of our products and services where you have requested these from us;
- b) check your eligibility and suitability for certain products or services which we offer and to notify you (directly or through your authorised intermediary) of what products and services we can offer you or whether your application for one of our policies has been successful;
- c) supply you with the products or services you have purchased or requested from us (including taking pre-contractual steps such as checking your eligibility and suitability for certain products or services);
- d) manage your account and policies held with us (including the processing of any claim you make under a policy you hold with us) and to respond to you when you contact us;
- e) notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Notice) from time to time;
- f) comply with our record keeping and regulatory compliance obligations; and
- g) where you have opted to receive the same, or where we have a legitimate interest to do so, send you communications concerning our product and service offerings, such as a newsletter, Notice of the Society's AGM and, where applicable, a Personal Membership Statement.

**We process this information on the following grounds:**

- i. because the processing is necessary for us to provide you with the products or service you have requested from us, including us carrying out any pre-contractual steps you have asked us to take (e.g. checking your eligibility or suitability for a particular policy);
- ii. because, in certain circumstances, the processing is necessary in order to protect your vital interests. In the case of special categories of information, this may be because you have become physically or mentally unable to give your consent to the processing;
- iii. because, in certain cases, the processing is necessary for us to comply with our legal obligations, for example where regulations oblige us to keep records of our customers' details or the details of policy quotes supplied to potential customers;
- iv. because, in certain circumstances, we have a legitimate business interest in doing so and that interest is not overridden by your interests or fundamental rights and freedoms (for example because you can opt-out of such materials at any time);
- v. additionally, in the case of special category information, because you have consented to us processing your information for the purposes of checking your eligibility, suitability or signing you up to our products or services. If you are a child under 16 then a parent or guardian will consent on your behalf; and
- vi. additionally, in the case of special categories of information where there is a dispute or potential for a dispute between us, because the processing is necessary for the establishment, exercise or defence of a legal claim.

**ii. Information provided by third parties:**

This relates to circumstances where a third party sends us information about you. Examples of when this might occur include (but are not limited to) 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. as part of your policy application, you complete a telephone medical assessment or medical screening with our external medical assessors and they share the results with us; or
4. we confirm your details with a third party (such as your employer) for the purposes of administering your policy application, the terms of your policy or any claim which you make under the terms of your policy.

The information we receive about you from third parties may include your name, address, email address, phone number, date of birth, gender, personal description and bank details.

We may also receive special categories of more sensitive personal information about you. This could include information about your health and genetics which we need to consider when determining your eligibility or suitability for our products or services.

**We process this information to:**

- a) supply you (directly or through your authorised intermediary) with details of our products and services where these have been requested from us;
- b) check your eligibility and suitability for certain products or services which we offer and to notify you (directly or through your authorised intermediary) of what products and services we can offer you or whether your application for one of our policies has been successful;
- c) supply you with the products or services you have purchased or requested from us;
- d) manage your account and policies held with us (including the processing of any claim you make under a policy you hold with us) and to respond to you when you contact us;
- e) notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Notice) from time to time;
- f) comply with our record keeping and regulatory compliance obligations; and
- g) where you have opted to receive the same, to send you marketing communications concerning our product and service offerings.

**We process this information on the following grounds:**

- i. because the processing is necessary for us to provide you with the products or services you (or your authorised intermediary acting on your behalf) have requested from us, including us carrying out any pre-contractual steps you (or your authorised intermediary acting on your behalf) have asked us to take for you (for example, checking your eligibility or suitability for a particular policy);
- ii. because, in certain circumstances, the processing is necessary in order to protect your vital interests. In the case of special categories of information, this may be because you have become physically or mentally unable to give your consent to the processing;
- iii. because, in certain cases, the processing is necessary for us to comply with our legal obligations, for example where regulations oblige us to keep records of our customers' details or the details of policy quotes supplied to potential customers;
- iv. because, in certain circumstances, we have a legitimate business interest in doing so and that interest is not overridden by your interests or fundamental rights and freedoms (for example because you can opt-out of such materials at any time);
- v. additionally, in the case of special categories of information, because you have (directly or acting through your intermediary) consented to us processing your information for the purposes of checking your eligibility, suitability or to sign you up to receive our products or services. If you are a child under 16 then a parent or guardian will consent on your behalf; and
- vi. additionally, in the case of special categories of information where there is a dispute or potential for a dispute between us, because the processing is necessary for the establishment, exercise or defence of a legal claim.

**iii. Information we collect about you:**

We 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 'Cookies' policy.

## 6. How long we keep your Information for

We only keep your information for so long as it is reasonably necessary. Generally speaking, we retain your information for the following periods of time:

- a) if you (or a third party acting on your behalf) make an enquiry with us but you do not proceed with making an application, 1 year from the date of the enquiry;
- b) if you (or a third party acting on your behalf) make an application for one of our policies but that application is then withdrawn, 1 years following the date of withdrawal;
- c) if you (or a third party acting on your behalf) make an application for one of our policies but your application is rejected by us, 1 years following the date of rejection (or the date that rejection is subsequently confirmed by our underwriting team, if applicable);
- d) if your active policy is cancelled (by whatever means), 6 years plus the current year after the date of cancellation; and
- e) where your policy matures or expires, 6 years plus the current year after the date of the later of: (1) the maturation/expiration; and (2) the settlement of all monies payable under the terms of the policy.

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 may be kept indefinitely.

## 7. 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 properly administer your policy (including processing a policy application or claim you have made).

To achieve this, we will share your personal information with the following people or groups of people:

- a) your authorised intermediary (if you have one);
- b) your doctor or nominated health professional(s);
- c) when you provide us with your employment details, your employer (and any outsourced human resources or payroll function they might use);
- d) on occasion, the Department of Work and Pensions should we need to verify your employment records;
- e) where you have existing insurance policies in place to protect your income, your other insurance providers so that we can coordinate our collective liability;
- f) our third party medical assessors (e.g. to conduct a telephone medical questionnaire with you); and/or
- g) when you provide us with payment details, your bank or your nominee's bank (as applicable);
- h) our external IT contractors who help with improve our IT systems.
- i) our external printers (e.g. to print and fulfil our newsletters and your Personal Membership Statement).

Your personal information will be encrypted before it is transferred to our hosts electronically. Our outsourced 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 will only share your special category information where you have consented to us doing so in advance, for example where you have instructed your authorised intermediary to submit a policy application to us on your behalf. If you do not consent to us processing certain information about you, such as your medical history, then we may not be able to process your policy application.

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.

## Testimonials

If we post your testimonial on our website, which may contain personal information such as your name, we will obtain your written consent prior to posting the testimonial. You can contact us at any time at [data@wiltshirefriendly.com](mailto:data@wiltshirefriendly.com) if you wish for a testimonial to be changed or removed.

If we do not receive any contact from you, we will delete it in accordance with our Data Retention policy.

## **8. Automated decision-making**

Automated decision-making takes place when an electronic system uses personal data to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless (i) you have given us your consent (ii) it is necessary for a contract between you and us, or (iii) is otherwise permitted by law. You also have certain rights to challenge decisions made about you.

We do not currently carry out automated decision-making in connection with your employment, but we will notify you in advance if this changes

## **9. 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) where we are processing your information on the grounds of your consent (e.g. your sensitive health information), you have the right to withdraw that consent at any time. As we need to process your health information to administer your policy, withdrawing your consent in this way will have the effect of terminating your policy (or policy application). Please contact us using the details set out at the end of this Privacy Notice or speak to your authorised intermediary if you would like to withdraw your consent and terminate your policy or application. Please note that:
  - i. the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;
  - ii. any payments due under the terms of your policy may still need to be paid and you will not usually be entitled to a refund of monies already paid; and
  - iii. if your membership is being investigated for fraud then we may continue to process your information insofar as is necessary for establishing or exercising a legal claim;
- 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;
- 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 do not currently undertake any direct marketing activities. However we will notify you in writing if this position changes.
- 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 Notice. The Information Commissioner's Office website is [www.ico.org.uk](http://www.ico.org.uk).

## 10. 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. This is called a 'Subject Access Request'. 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:

- a) your request for information we hold on you is normally free of charge. However, we will be allowed to charge you if your request is clearly unfounded or excessive, for our reasonable administrative costs in collating and providing you with details of the information we hold about you; and
- b) you will, in certain circumstances, be entitled to receive the information in a structured, commonly used and machine readable form.

## 11. Data Security

We are committed to ensuring that your Personal Information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the Personal Information we collect online.

## 12. Access to Medical Reports Act 1988 Consent

Please note that if you give consent for us to request a copy of your medical records in accordance with the Access to Medical Reports Act 1988, that consent is separate to the consent you may give us to process your information under data protection law.

## 13. Changes to this Privacy Notice

Any changes made to this Privacy Notice in the future will be posted on the Website as we will not usually inform individuals of the changes we make. It is recommended that you visit this page from time to time to review any changes. This Privacy Notice was last updated in March 2019.

## 14. Data Protection Administrator

For any further information on this Privacy Notice, to make a subject access request or to exercise your rights under the UK data protection legislation, please contact our Data Protection Administrator, Lee Davis:

Email: [data@wiltshirefriendly.com](mailto:data@wiltshirefriendly.com)  
Telephone: 01225 756791