

## National Friendly Financial Solutions 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;
- 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 Financial Solutions is the trading name of 425 Direct Limited which is a wholly owned subsidiary of National Friendly. National Friendly Financial Solutions is authorised and regulated by the Financial Conduct Authority and is a member of the Financial Services Compensation Scheme. 425 Direct Ltd is registered with the ICO as a data controller registration number: **Z9573461**.

## **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, by phone or email; whilst using our financial advice or comparison service. The personal data we collect includes:

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

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

If you are required to provide the personal data of any other beneficiary or person connected with you, 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.

## **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:

- health information;
- 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 identifiable 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 for financial advice or for our comparison service we will collect personal data about you and other people connected to you. We may also collect your data from intermediaries and other third parties where we have your permission, where required to provide our services. . Examples of when this might occur include where:

1. we need to undertake an identity check with a credit reference agency;
2. we receive a report of suspected fraudulent activity;
3. we receive a high risk/PEP alert;
4. we purchase data from a data house for the purpose of marketing campaigns;
5. we purchase data from a lead provider for the purposes of telesales.

If you provide us with personal data of people who benefit from the services we provide you, 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 financial advice and a non-advisory comparison service	To undertake our contractual obligations
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
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
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 Financial Solutions 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**

Your personal data is protected by legal rights. These include the right in certain circumstances to:

- request a copy of your personal data;
- have the right to request erasure of your personal data or to restrict processing in accordance with data protection laws. However, there may be circumstances where you ask us to erase your personal data or restrict our processing of your data but we are legally entitled to refuse that request and you will be notified if this is the case;
- 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 where we are processing it in the exercise of our legitimate interest;
- object to direct marketing. Where National Friendly Financial Solutions 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.

### **Transfer of data abroad**

If your personal data is transferred to a country outside of the European Economic Area, we will ensure it is transferred in accordance with this policy and subject to appropriate safety measures. Organisations which receive your personal data from us must accept contractual obligations, or subscribe to international standards, designed to protect your personal data to European standards. Further details about the safeguards in place to protect your personal data in these circumstances can be obtained from the Data Protection Officer.

### **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 Financial Solutions  
11-12 Queen Square  
Bristol  
BS1 4NT

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

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.