

## *Privacy Policy*

### *Members and third parties*

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#### **What this Policy covers**

This Privacy Policy gives you information about how British Friendly Society Limited, and its subsidiary BFS Member Services Limited (collectively, the “Society”) treats personal information we receive about you.

Please read the following sections carefully to understand how your personal information will be used and handled by the Society. Your use of our Website is also subject to our Website's Terms and Conditions – visit <https://www.britishfriendly.com/info/terms-conditions/> for more information.

The Society collects and uses your data in accordance with current data protection law.

#### **Who we are**

In relation to any insurance policies, and the Society’s discretionary member benefits, the data controller with control of your personal information is **British Friendly Society Limited of 45 Bromham Road, Bedford, MK40 2AA.**

In relation to any credit granted, the data controller with control of your personal information is BFS Member Services Limited of **45 Bromham Road, Bedford, MK40 2AA.**

The Society's Data Protection Officer can be contacted using the details found in the ‘Contact’ section at the end of this policy.

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 third parties or their policies/websites.

#### **Who this privacy policy applies to**

This privacy policy concerns the processing of personal data of a wide range of individuals. This includes, but is not limited to, members, other third parties acting on behalf of members (incl. those appointed under authority or power of attorney) or who provide information in support of a members application or claim (incl. their Doctors or care providers) and beneficiaries and executors in respect of deceased members.

If you provide us with information about another person, you should ensure they are aware of this privacy policy.

#### **Intermediaries**

If you are an authorised intermediary acting for an individual and you provide that individual's personal information to us via our Website, over the phone or by other means, such as through a portal, 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 Policy. Please refer to the most recent Intermediary Terms of Business for further information concerning your data protection obligations.

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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 Policy refers to that third party as an "authorised intermediary". If you have any questions about how your authorised intermediary processes your personal information, please speak to them directly.

### Parents, guardians, sponsors and proxies

If you are a parent, guardian or sponsor of a child policyholder or child policy applicant then this Privacy Policy, unless otherwise stated, applies to your personal information and to the personal information of the child. This policy also applies, where applicable, to persons casting proxy votes on behalf of members of the Society.

For policies that include Children's Critical Illness Cover, this policy also applies to the personal information we process about children covered under that additional benefit.

### Information - collection, use and grounds for processing

The Society collects and processes information from a variety of sources. This includes, where applicable:

- information provided on or in connection with an application or claim form, or via a letter, e-mail, phone call or by contacting us through the 'Contact Us' section of our Website;
- information provided about you as a beneficiary, or as another person appointed to act by the courts, under an authority or power of attorney on a members behalf;
- information provided by your authorised intermediary, or another authorised third party acting under an authority granted by the courts or by you, including under a power of attorney you have granted, on your behalf;
- information obtained from your doctor, care provider or another medical professional, including your medical records or information, for the purposes of assessing an application for one of our insurance products or for assessing a claim;
- information obtained from your employer, the Department for Work & Pensions, external investigators, public sources (including the internet) and where applicable, your school, for the purposes of assessing a claim;
- information you provide to our appointed external medical assessors which is shared with us when you complete a medical assessment or medical screening;
- information you provide to us when you agree to participate in case studies or research
- information submitted to us or obtained from public sources, including social media; and
- information provided to us by third parties which we process to meet rules and regulations relating to the prevention, detection and mitigation of financial crime, to administer your application, your policy or any claim you make.

An illustrative list of information we may collect and process is outlined below. The actual information we collect and process will depend on a range of factors, including whether

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you are a member or another third party and the product held. The Society takes measures to ensure it does not process more information than is necessary for the purpose it is being processed:

- personal details including your name, date of birth, gender and, where applicable, relationship with a member;
- other identifying information including, where applicable, NHS reference number, tax reference number, professional reference number and IP address;
- contact details including your address, e-mail address and phone number;
- lifestyle information including about your tobacco usage and alcohol consumption, and information about your hobbies;
- nationality, sex and ethnicity;
- financial details including your bank account number and sort code;
- information about other insurance policies you have; and
- occupation and employment information.

Where you agree to participate in case studies, we may collect and process information such as your image, including photo(s) and/or video(s), and information about your hobbies.

Where applicable, we may also collect and process 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 a (prospective) members eligibility or suitability for our products or services or, where applicable, which you otherwise provide to us to help us tailor our support to meet your needs; or
- criminal offence data which we may process for the purposes of preventing, detecting, and mitigating financial crime in accordance with our legal and regulatory obligations.

Health and genetic information relating to a members close family members may also be collected as part of the application process. Those family members would not usually be identifiable from that information, unless they otherwise become known to us at a later date (for example, because they are nominated as a beneficiary, act as executor of a deceased members estate or are given power of attorney).

#### **We process this information to:**

- supply the applicant or those acting on their behalf (directly or through their authorised intermediary) with details of our products and services where this has been requested;
- check eligibility and suitability for products or services which we offer and to notify the applicant or those acting on their behalf (directly or through their authorised intermediary) of what products and services we can offer, to provide illustrations, and to determine whether an application for one of our policies has been successful;
- identify and verify a parties authority to act on a member's behalf;

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- provide reinsurer(s) with information so that they can support with the assessment of an application, a decision on a claim, or support servicing of an insurance policy;
- supply and administer the products or services purchased or requested from us, including the ongoing administration of these products and services, maintaining accurate personal data and general policy servicing;
- manage memberships and Policies held with us, including (if applicable):
  - the processing of a claim
  - the processing of a withdrawal
  - the processing of ongoing annuity payments
  - the processing of any payment due following the death of a member
  - the making of other associated payments (incl. for medical evidence)
  - to handle any complaints raised
  - to respond to you when you contact us;
- notify you of changes to our products, services, procedures and terms (including material changes to this Privacy Policy) from time to time;
- comply with our legal and regulatory obligations, including in relation to record keeping, regulatory reporting and the prevention, detection and mitigation of financial crime;
- assist us in determining whether you would be eligible to feature in a case study, building and creating that case study and to accommodate any particular requirements you might have in connection with your participation in a case study, including dietary requirements;
- establish, exercise or defend legal claims;
- manage our business operations, including:
  - conducting compliance monitoring and internal and external audits
  - company accounting
  - managing reinsurance
  - analysing business and sales performance and other management information and identifying trends
  - conducting experience analysis
  - updating pricing;
- review and improve our products and services, through quality assurance, call monitoring, research and staff training;
- comply with our statutory obligations and Society rules relating to Annual General Meetings (“AGMs”) and resolutions;
- identify and provide tailored support to those with additional needs;

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- where you have opted into receiving them, or where we otherwise have a legitimate interest, send you marketing communications concerning our product and service offerings;
- administer our discretionary member benefits; and
- administer incentive arrangements which you have opted in to, for example in connection with completing a survey we have sent to you.

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

- because the processing is necessary for us to provide the product(s) or service(s) requested or purchased from us, including to carry out any precontractual steps we've been asked to take. For example, checking eligibility or suitability for a particular policy;
- because, in certain cases, you have consented to us processing your personal and (where applicable) special category information. For example:
  - to assess your eligibility for a product we provide;
  - to check the entitlement to receive payment or other benefit under the terms of a policy or as a member of the Society;
  - to provide you with appropriate and tailored support;
  - for marketing purposes; and
  - when you participate in case studies or surveys.

If you are a child under 16 then a parent or guardian will consent on your behalf;

- because it is necessary for us to carry out our contractual obligations under the terms of your Policy, this includes paying out a claim if it is eligible;
- because, in certain cases, the processing is necessary for us to comply with our legal and regulatory obligations;
- because, in certain cases, the processing of your personal or, where applicable, special category information is necessary in order to protect your vital interests;
- additionally, in the case of special categories of information:
  - because the processing is necessary for the establishment, exercise or defence of a legal claim – for example, where there is a dispute or potential for a dispute between us;
  - because doing so is necessary to safeguard your economic wellbeing;
  - in order to prevent or detect unlawful acts and fraud;
  - in relation to an insurance policy applied for through an authorised intermediary on or after **11<sup>th</sup> June 2022**, for the purposes of arranging, underwriting, or administering your insurance policy or exercising a right, or complying with an obligation, arising in connection with an insurance contract, including a right or obligation arising under an enactment or rule of

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law in the substantial public interest. This includes where we share your information with a reinsurer; and

- because, in certain circumstances, we have a legitimate interest in doing so.

Where we process your information for our legitimate interests, the interests relied on will standardly be:

- to provide you with information about the products and services we offer which we believe could be of interest;
- to help us to assess a (prospective) members' eligibility for a product.
- to help us better understand our members and improve customer service;
- to comply with our legal and regulatory obligations for the prevention and detection of, and otherwise to protect the Society from, financial crime;
- to improve and/or develop our business, products, and services, while enabling us to comply with our legal obligations;
- to defend and safeguard the business, members, employees, or relevant third parties from potential legal action;
- to comply with our legal and regulatory obligations for the ongoing administration of a policy;
- to keep our records up to date;
- to provide appropriate and tailored support to members
- to enable members to realise the benefits of their membership including administration of any applicable discretionary benefits; and
- to administer a member's policy/membership, including in the event of their passing or where they lack capacity to act on their own behalf.

We have considered your rights and freedoms and concluded that they are not overridden by these interests.

#### Other Information we collect about you

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 'Cookies' section below.

#### We process this information to:

- to allow us to administer the account you hold with us;
- to ensure that content from our Website is presented in the most effective manner for you and for your device; and
- to collect anonymous statistical data to improve our services.

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

- because we have a legitimate business interest in maintaining, developing, and safeguarding the security of our website and available information in order to improve our service.

### 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:

- in connection with an enquiry which does not proceed with an application, or with an application which is later withdrawn, 2 years from the date of the enquiry or withdrawn application;
- in connection with an application which is declined, 2 years following the decision date or the date that decision is subsequently confirmed by our underwriting team, if applicable;
- in connection with a claim against a policy held with us, 6 years from the termination of your policy
- if you participate in a case study then we will keep your personal information for the duration that we continue to use that case study. This is usually no longer than 5 years. If you withdraw your consent at any time then your information will be kept for 2 years from the date you withdraw your consent. If you agree to participate in a case study that we decide not to progress, we will keep your information for 6 months from the day we decide not to proceed with that case study;
- in connection with an active Policy which is cancelled, 6 years after the date of termination; and
- in connection with a Policy which matures, 6 years from the later of: (1) the maturity date 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 a Policy or a claim 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 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 can be kept indefinitely.

### How we share your information

Your personal information is not shared with anyone except for the purposes set out in this privacy policy and otherwise where we are required to do so to comply with the law, to protect our rights, to properly administer products and memberships (including processing a policy application or claim that's been made) or (where applicable) to administer and distribute case studies.

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

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- your authorised intermediary (if you have one);
- someone you or the courts have granted authority to act on your behalf, including under a power of attorney;
- your doctor or nominated health professional(s);
- your care provider(s);
- our reinsurer(s) – by reinsurer(s) we mean a party that provides reinsurance services to us in respect of risks we underwrite, including by taking on a proportion of the risks we insure. If you'd like further information on the reinsurers we may provide your personal information to and how this may be used, please contact us;
- if you are under 16 and you have signed your own data protection consent, your parent or guardian;
- when you provide us with your employment details, your employer (and any outsourced human resources or payroll function they might use);
- if you are a child, your school or education establishment;
- on occasion, the Department of Work and Pensions should we need to verify your employment records;
- HM Revenue & Customs, where we are required to report on payments you receive from us;
- where you have an existing insurance policy in place to protect your income, your other insurance providers so that we can coordinate our collective liability;
- third party medical assessment and screening providers we partner with or our Chief Medical Officer (e.g. to conduct a telephone medical questionnaire with you);
- external investigators to verify the facts set out in your claim where we suspect fraud, other illegal activity or have concerns about the accuracy of information you have provided to us;
- when you provide us with payment details, your bank, your parent(s)/guardian(s) bank or your nominee(s) bank (as applicable);
- our third party marketing platform who facilitate our mailing lists;
- third parties we use to facilitate and deliver annual and other general meetings of the Society;
- third party processors to assist us with our administration of your membership, including issuing communications.
- third parties we partner with to provide our discretionary member benefits.
- our third party member screening provider to aid our compliance in regulatory and legal obligations;
- in relation to case studies, your information may be published on our website and included within, or referred to, in literature and communications and may be shared

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with other third parties, including photographers, videographers, journalists, PR consultants, external marketing agents and catering service providers;

- our external IT providers who host our IT systems. Typically, your personal information will be encrypted before it is transferred to our hosts but in certain circumstances they may require access to unencrypted data, for example when we need to troubleshoot an issue with your account on our computer system. Our IT 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 and;
- where we use a credit reference agency to validate your identity. This leaves a soft "footprint" on your credit file and is only visible to you.

Where we have not otherwise identified an appropriate lawful basis to share your information with third parties, we will only share your information where you have consented to us doing so in advance. 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 request.

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.

Your information will not be transferred outside of the United Kingdom or to any country which is not approved by an adequacy regulation of the UK government. If this changes then we will let you know.

#### Automated decision making

To assess or administer policy applications or claims, we may use automated decision making.

Personal and special category information will be used in our decision making (see the 'Information - collection, use and grounds for processing' heading). This enables us to assess whether we can insure you and on what terms, and also whether or not a claim can be paid.

You can object to us making automated decisions about you at any time. The contact details for doing so are set out at the end of this Privacy Policy.

If you are an adult, we may carry out automated decision making for marketing purposes. This is done to record your preferences and to create a personal profile which ensures you only receive marketing information from us which we think will interest you. You can object to us processing your personal information in this way at any time by contacting us using the details set out at the end of this Privacy Policy.

#### Your rights

Under data protection law you have the following rights:

- 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;

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- where we are processing your information on the grounds of your consent, you have the right to withdraw that consent at any time. Please note that that withdrawing your consent to us processing your personal or special category information may, depending on the circumstances, have the effect of withdrawing a claim or terminating a Policy (or policy application).

Please contact us using the details set out at the end of this Privacy Policy or, where applicable, speak to your authorised intermediary if you would like to withdraw your consent. Please also note that:

- the lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;
- (where applicable) 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; and
- we may continue to process your information insofar as is necessary for establishing, exercising or defending a legal claim;
- 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;
- in certain circumstances, the right 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;
- 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;
- in certain circumstances, the right to object to processing of your information;
- the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by taking the prescribed action and not opting in on the forms we use to collect your information, where applicable, clicking the unsubscribe link in marketing e-mails we send you, opting out of marketing communications by changing your account details through our Website or by contacting us using the details set out in the 'Contact' section, below;

- the right to object to decisions being made about you by automated means;
- the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate; and
- 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 and to the Information Commissioner's Office if you have any concerns about how we hold and process your information. Our

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contact details are set out at the end of the Privacy Policy. The Information Commissioner's Office website is [www.ico.org.uk](http://www.ico.org.uk).

For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau ([www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)) or the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

### Access to information

Under data protection law you can exercise your right of access by making a request to receive copies of some of the information we hold on you. You may be required to 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.

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

### Data security

If you choose or are provided with a user identification code, online account login, password or any other piece of information as part of our Website's security procedures, you must treat that information as confidential and you must not disclose it to any third party.

The Society has the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in the Society's opinion you have failed to comply with any of the provisions of this Privacy Policy or our Website Terms and Conditions. Visit <https://www.britishfriendly.com/info/terms-conditions/> for more information.

Unfortunately, the transmission of information via the internet is not completely secure. Although the Society will do its best to protect your personal information, it cannot guarantee the security of your data transmitted to our Website. Any transmission is at your own risk.

### Cookies

For information about how we use cookies on our website, please refer to our Cookies Policy at <https://www.britishfriendly.com/info/cookies/>.

### 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.

If we cannot obtain your consent to obtain these records, then we may be unable to process your insurance policy application or a claim.

### Further matters to consider

When you use the services of a third party, additional terms may apply and we may not be the data controller. We recommend reading the third party's terms and conditions and applicable privacy policy carefully before providing further personal information.

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As we will not control or process any data you provide to the third party, should you wish to withdraw your consent for any processing of your data by the third party you will need to contact them in accordance with their privacy policy.

#### **Changes to this Privacy Policy**

Any changes made to this Privacy Policy in the future will be posted on the Website and, where appropriate, notified to you. It is recommended that you visit this page from time to time to review any changes. This Privacy Policy was last updated on **01/06/2026** and is effective from **01/06/2026**.

#### **Contact**

For questions, comments and requests regarding this Privacy Policy please contact us by e-mail for the attention of the Data Protection Officer at [compliance@britishfriendly.com](mailto:compliance@britishfriendly.com) or by post to the Data Protection Officer, British Friendly Society, 45 Bromham Road, Bedford, MK40 2AA.