

Privacy Notice - Website

Owner – Company Secretary & Head of Compliance

Version and Approval History

Version	Author	Date	Description	Reviewer / Approval
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Maintenance

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1 Introduction

Cirencester Friendly is committed to safeguarding the privacy of personal and sensitive personal data and is bound to comply with the UK Data Protection Act 1998 and EU General Data Protection Regulation (GDPR), along with similar and applicable laws in other countries around the world. This Privacy Notice forms part of Cirencester Friendly's obligation to be open and fair with all individuals whose personal and sensitive personal data Cirencester Friendly processes and to provide details around how it processes such personal data and what it does with it.

Cirencester Friendly processes the personal data of its customers such as names, contact details and email addresses, amongst other things. Processing of this data implies collecting, storing, using, disclosing or disposing of individuals' personal data.

Existing or prospective customers who leverage Cirencester Friendly's product and services, or use Cirencester Friendly website, may be provided with further privacy notices which may be contained in a separate supplemental notice. These additional privacy notices shall supplement this Privacy Notice.

This Privacy Notice relates to the processing of personal data by Cirencester Friendly. Unless otherwise stated, all references to "we" or "our" shall imply all Cirencester Friendly that processes personal or sensitive personal data.

None of the lists, or examples provided in this Privacy Notice, are intended to be exhaustive or fully representative of every individual.

2 Scope

The scope of this Privacy Notice covers customers (existing and prospective) personal data in respect of the following: -

- Collecting Personal Data
- Using Personal Data
- Disclosing Personal Data
- Retaining Personal Data
- Securing Personal Data
- International Data Transfers
- Subject Access Requests
- Updates / Amendments
- Third Party Websites
- Cirencester Friendly Website – Use of Cookies
- Opt-in / Opt-out
- Our Details
- Complaints

3 Collecting Personal Data

We may collect and store the following kinds of personal data: -

- a) Information about your computer and about your visits to Cirencester Friendly website, including your IP address, geographical location, browser type and version.
- b) Information that you provide to us for the purpose of subscribing to our marketing communications.
- c) Information that you provide to us when using any of the products and services, or that is generated during the course of using those solutions and services.
- d) Information that you post on our social media platforms E.g. Twitter.
- e) Information contained in, or relating to, any communication that you send to us through our website, email or in writing.
- f) Information that you provide as part of performing money laundering, financial and credit checks as well as for fraud and crime prevention and detection purposes.
- g) Information related to the security and access of our premises, systems and applications.
- h) Information to help us comply with our legal and regulatory obligations, including reporting to and being audited by regulators and external auditors.
- i) Information to help us comply with court orders and to exercise and defend our legal rights.
- j) Any other personal information that may be sent to us and which we use for legitimate business purposes.

Before you disclose to us the personal data of another person, you must obtain that person's consent to both the disclosure and the processing of that personal data in accordance with this Privacy Notice. Where the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, we are mandated to collect this personal information in order to provide you with our products or services. Non provision of this information means that we cannot provide you with the product/services requested.

4 USING PERSONAL DATA

We may use your personal information to:

- a) Administer, personalise and secure our website.
- b) Enable your use of any product or service that we may provide through our website.
- c) Supply you with our product and services.
- d) Send invoices and payment reminders to you or collect payments from you.
- e) Send you marketing communications.
- f) Deal with enquiries and complaints.
- g) Perform money laundering, financial and credit checks.
- h) Ensure appropriate access to premises, systems and applications.
- i) Comply with our legal and regulatory obligations.

5 Disclosing Personal Data

We only disclose your personal data in the ways set out in this Privacy Notice or subject to any agreements in place between us. The following circumstances may apply:

- a) Across our different lines of business, as part of a need to know or as part of improving our existing products and services or as part of providing new solutions and services.
- b) To third parties who process personal data on our behalf, such as systems providers.
- c) To third parties who process personal data on their own behalf (Financial Adviser, Independent Financial Advisers) but provide us, or you, with a service on behalf of us (e.g. Healthcare Providers, nursing providers).
- d) To third parties with whom information is shared for money laundering checks, credit risk reduction and other fraud and crime prevention purposes.
- e) To any prospective buyer in the event we sell any part of our business, or its assets, or if substantially all of our assets are acquired by a third party.
- f) To any regulator (E.g. Financial Conduct Authority, Prudential Regulation Authority), external auditor or applicable body or court where we are required to do so by law or regulation or as part of any investigation.
- g) To any central or local government department and other statutory or public bodies, such as the HMRC, Department for Works and Pension.

We do not sell, rent or trade any of your personal data.

We will not, without your consent, disclose or supply your personal data to any third party for the purpose of their or any other third party's direct marketing.

6 Retaining Personal Data

Personal data that we process, for any purpose or purposes, shall not be kept for longer than is necessary. Cirencester Friendly bases its record retention on any legitimate interest, consent, legal, regulatory or contractual obligations.

Where the continued retention and/or processing of your personal data is based upon our legitimate interest, in all instances this legitimate interest is so that as a business we can functionally and satisfactorily provide you with services offered, whilst also remaining a responsible provider to you, to us and to the wider society.

Where the processing of your personal data is based on consent, you have the right to withdraw consent at any time, without affecting the lawfulness of the processing, where we do not have any overriding legal, regulatory or contractual obligations for continued retention of such data.

7 Securing Personal Data

Where Cirencester Friendly acts as the controller of personal data, it will ensure that necessary and adequate safeguards are in place to prevent unauthorised access, loss, misuse or alteration of your personal data.

We store all personal information on secure servers with relevant access and firewall controls.

Any personal data sent to us, either in writing or email, may be insecure in transit and we cannot guarantee its delivery.

Passwords must be kept confidential and not disclosed to a third party. Cirencester Friendly does not ask you for your password.

8 International Data Transfers

Personal data that we collect, is stored in the UK and not outside the European Economic Area. Should we need to transfer personal outside of the UK or European Economic Area in the future, such personal data will be covered by binding corporate rules or contractual arrangements to ensure it is processed appropriately.

When data is processed (or will be processed) outside of the UK or European Economic Area, we will notify you.

9 Subject Access Requests

You may instruct us to provide you with any personal data we hold about you as part of a Subject Access Request. The provision of such information will be subject to: -

- a) Appropriate evidence of your identity, such as a passport, driving licence as well as a recent bank statement or utility bill.

In certain instances, where exemptions exist, we may withhold personal data that you request, and which are permissible by law.

You have the right to rectification and may wish to contact us if the personal data that we hold about you needs to be corrected or updated.

You have the **right to object** to us processing your data, and the right to request we restrict the processing of your data.

We do not perform any auto-profiling of individuals.

10 Updates / Amendments

In order to remain compliant with any legal and regulatory obligations, or as part of our evolving business practices, we may update this Privacy Notice from time to time by publishing a new version. In certain instances, we may notify you.

11 Third Party Websites

We are not responsible for the practices employed by Third Party Websites linked to or from our Website nor the information or content contained therein. Often links to other websites are provided solely as reference points to information on topics that may be useful to the users of our Website. Please remember that when you use a link to go from our Website to a Third-Party Website, our Privacy Notice will no longer apply. Your browsing and interaction on any other Website, including Third Party Websites, which have a link on our Website, are subject to that Website's own Privacy Notice.

12 Cirencester Friendly Website – Use Of Cookies

Cirencester Friendly records the number of visitors to the relevant sections of our Website and tracks movement between the sections by means of 'cookies'. Cookies are small data/text files containing anonymous information placed on your computer and are automatically downloaded to a user's hard drive in order to recognise a user that has visited our Website previously. Cirencester Friendly reserves the right to use cookies in order to analyse trends and to improve the design and layout of its Website. You cannot be identified as an individual from this type of information.

13 Opt In / Opt Out

You have the right, at any time, to ask us not to process your personal data for marketing purposes.

You can opt-out of receiving email communications simply by clicking the unsubscribe link, which is contained within marketing emails.

You may instruct us at any time not to process your personal data for marketing and communications purposes by means of 'opting-out'.

Please note it can take up to 30 days for a request to be fulfilled because of pre-planned or ongoing marketing activity.

14 Data Protection Registration

We are registered as a data controller with the UK Information Commissioner's Office and our data protection registration number is **Z7738566**.

15 Our Details

Cirencester Friendly is registered and Incorporated under the Friendly Societies Act 1992 Reg No **149F**.

Its trading office is at Mutuality House, The Mallards, South Cerney, Cirencester, Glos. GL7 5QT

You can contact us as follows: -

Email: dpo@cirencester-friendly.co.uk

Web: www.cirencester-friendly.co.uk

Telephone: +44 (0)1285 652492

In Writing: Data Protection Officer
Cirencester Friendly
Mutuality House
The Mallards
South Cerney
Cirencester
Glos. GL7 5TQ.
United Kingdom

16 COMPLAINTS

If you feel your rights have not been respected, or do not feel a situation was resolved satisfactorily, you have the right to raise a complaint with the UK Information Commissioner.

You can contact them as follows: -

Web: <https://ico.org.uk/concerns/>

Telephone: +44 (0)303 123 1113

In Writing: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Cirencester Friendly is a trading name of Cirencester Friendly Society Limited. Registered and incorporated under the Friendly Societies Act 1992. Reg. No. 149F. Cirencester Friendly Society Limited is Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration number 109987.