

INTERMEDIARY PRIVACY NOTICE

Purpose

This notice explains how Cirencester Friendly Society Limited collects, uses, shares, and protects your personal information, as well as your rights with respect to the personal information we process about you.

In this Privacy Notice:

- "We/Us/Our" means Cirencester Friendly Society Limited ('The Society'). We are regulated by the Financial Conduct Authority and the Prudential Regulation Authority.
- "You/Your" means any Adviser who markets and sells our products either independently or via a firm.
- "Third Party" means someone who is not you or us.

The Society is committed to protecting the security of the personal information you share with us or that we may receive or have about you. We process personal information honestly, ethically, and always consistent with applicable regulations and our values.

We are registered as a data controller with the Information Commissioners Office (registration number Z7738566). This means that we decide how and why your personal information is processed.

How do we collect your personal information?

We may collect, use, and store different kinds of personal information about you, during your or your firm's contractual term with us. This includes:

- Contents of an application form by you or your firm.
- Where you supply us with personal information by other means such as phone call, letter, email, or by contacting us through our adviser portal/services.
- Visiting, using and registering for our adviser portal.
- Where you supply us with personal information at events or when you complete any of our surveys.
- Where you submit an application or request information on behalf of a client.
- Where you act as our point of contact for your firm.
- We may collect your information from public sources such as social media or the Financial Services Register.

To ensure that we have accurate and up-to-date information, please notify us if any of the personal details you've provided change during your relationship with us or your firm.

What personal information do we collect?

In order to manage our working relationship with you, we will need to collect, process and store personal information such as:

- Your name and your firm's name.
- Your address and your firm's address.
- Email address.
- Telephone number.
- Date of birth.
- FCA individual registration number.
- Passport/driving licence details.
- Firm's bank account details.
- Firm's Director details.
- Details of enforcement sanction or disqualification details or similar.
- Your alleged conduct/behaviour if it relates to a complaint.
- Criminal convictions and offences data.
- Marketing and communications data including your preferences in receiving marketing from us and your communication preferences.

Why do we collect, process and store your personal information?

We collect, process and store your personal information mainly to manage the contractual relationship between (1) the Society and your firm, and/or (2) the Society and you, as well as to monitor firms to ensure they do not lead to legal or regulatory breaches or significantly harm our reputation.

For the purposes of managing our contract with you and/or your firm, we will process your personal information to:

- Join your firm's panel and register you and/or your firm on our systems.
- Onboard you as one of our advisers.
- To process and deliver commission payments and other transactions with your firm.
- To manage our relationship with your firm.
- To investigate any complaints against your firm.
- To allow you to take part in a prize draw, competition, or complete a survey.

We process this information because it is necessary for us to fulfil our contract, which includes entering into and managing transactions with Members, paying commission under our agreement with you and/or your firm, and taking any pre-contractual steps such as performing our due diligence checks before onboarding you and your firm.

To comply with our regulatory requirements and to protect the Society and its Members against fraud, your personal information is checked against Credit Reference Agencies to:

- Detect and prevent crime, fraud, money laundering.
- Verify the identity of a firm or you.
- Verify the address of a firm or you.

For our own legitimate interest purpose, we may process your personal information to:

- Offer suggestions and recommendations for products or services that may be relevant to your firm.
- Use data analytics to enhance our website, products/services, marketing, relationship with firms, and overall experiences.

You will only receive marketing communications from us if you have requested information or if your firm has entered into (or is in the process of entering into) an agreement with us appointing your firm as an intermediary, and you have not opted out of receiving such marketing. You can opt out of receiving marketing messages at any time by using the opt-out links in any marketing communication or by contacting us directly.

Please note that opting out of marketing messages will not affect personal information provided to us through your firm's contractual agreement (or potential contractual agreement) as an intermediary with us. This includes communications related to new products for potential Members that you may sell on our behalf.

We believe that our legitimate business interests' reasons for processing your data are not outweighed by your interests or fundamental rights and freedoms.

Use of cookies

To make your visit to our website more attractive and to enable certain functions, we employ the use of cookies on some of our pages. These are small text files that are stored on your computer.

Some of these cookies are deleted upon exiting the browser (so-called session cookies). Other cookies are stored on your computer and enable us to recognise you when you return to our website (persistent cookies). For more information, please refer to our cookie policy [here](#).

Who do we share your personal information with?

Your personal information may be shared with the following parties for the purposes outlined in section above:

- Third parties that we work with such as our underwriting and adviser platform provider, our IT and systems security providers, our credit reference or identity verification service provider.
- With 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.
- With any central or local government department and other statutory or public bodies, such as the HMRC, Department for Work and Pensions.
- Where we need to do so in order to exercise or protect our legal rights, other users, or our systems and services.

We will not sell or rent your data to third parties or share your data with third parties for marketing purposes. We require all third parties to ensure the security of your personal information and to handle it in accordance with applicable laws. Our third party service providers are not permitted to use your personal information for their own purposes and are only authorised to process it for specified purposes, as instructed by us.

How long do we keep your personal information for?

How long we hold your personal information for will depend on your contractual relationship with us. We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

Personal information that we process for any purpose, shall not be kept for longer than is necessary. We will assign clearly defined retention periods to your information to ensure it is kept for the appropriate length of time.

How we keep your personal information secure

Our systems are built and monitored to ensure the safety of your data at all stages from the moment we collect it to the processing and storing of your data. We are dedicated to ensuring the security of your data through robust systems and protocols.

Our measures include employing encryption at distinct levels to safeguard your information from unauthorised access or disclosure. We take reasonable steps to confirm your identity before disclosing any personal information to you.

All our staff get regular training, and we limit access to your personal information to those employees, contractors and other third parties who have a business need to know.

We maintain CCTV records inside and outside our offices for the purposes of detecting, preventing or prosecuting crime.

All personal data collected by the Society is processed and stored in the UK or within the European Economic Area. Should we need to transfer your personal data outside of the UK or European Economic Area in the future, such personal data will be covered by the appropriate regulatory control to ensure it is processed appropriately.

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

Your rights

Under the data protection laws you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

Your Rights	More Information
Your right of access (Subject Access Request)	<p>You have the right to ask us for copies of your personal information. This right always applies.</p> <p>We normally have 1 calendar month to respond to your request unless there are reasons which could stop us from doing so. In this case, we will notify you of the reason within 1 calendar month and aim to respond to your request within 2 calendar months from the notification of the delay.</p>
Right to rectification	<p>You have the right to ask us to correct personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.</p> <p>It is your responsibility to tell us about any changes to your information.</p>
Your right to erasure	<p>You have the right to ask us to erase your personal data in certain circumstances.</p> <p>However, this is not an automatic right, and we may have some legal and regulatory obligations which mean we cannot fully comply with your request.</p>
Your right to restriction of processing	<p>You have the right to ask us to restrict the processing of your personal data in certain circumstances.</p>
Your right to object to processing	<p>Where we process your personal information on the basis of legitimate interest, you have the right to object to the processing of your personal data in certain circumstances.</p>
Your right to data portability	<p>You have the right to ask that we transfer the personal data you gave us to another third party of your choice, or to you, in certain circumstances.</p>

To exercise any of your rights, you can do so by contacting our Adviser Services Team at adviserservices@cirencester-friendly.co.uk or by contacting our Data Protection Officer at dpo@cirencester-friendly.co.uk. To fulfil your request, we may need to ask you for proof of identity. We'll handle any requests as soon as possible, at least within 1 calendar month.

Notification of data breach

If we experience a data breach that is likely to pose a high risk to your rights and freedom, you will be notified immediately and later informed of any actions we took in response.

Changes to this privacy notice

We regularly review how we process your personal information, which means we will update this notice from time to time.

Where we have updated this notice, this will be reflected on our website, and we may notify you via email.

This privacy notice was last updated on 10th December 2024.

How to contact us

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, GL7 5TQ, United Kingdom.

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 by contacting our Adviser Services Team or contacting the Data Protection Officer at dpo@cirencester-friendly.co.uk.

If you remain dissatisfied, you have the right to raise your complaint with the UK Information Commissioner.

You can contact them as follows:

Web: www.ico.org.uk/make-a-complaint/

Telephone: +44 (0)303 123 1113

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