

# **Short Form Privacy Notice**

Owner - Company Secretary & Head of Compliance

# **Version and Approval History**

Version	Author	Date	Description	Reviewer / Approval
0.1	Andrew Okwedadi	23/05/2018	Final Draft	Andrew Horsley
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### **Maintenance**

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#### 1.Overview

An overview of how we collect and use your information This is an overview of:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure
- your rights to your information.

#### 2. More Information

For more details about anything covered in this overview, please see our full Privacy Notice—you can view or download a copy by visiting <a href="https://www.cirencester-friendly.co.uk/privacypolicy">www.cirencester-friendly.co.uk/privacypolicy</a> or if you prefer paper, give us a call on +44(0)1285 652 492, or if you're a customer, we'll send you one in the post.

#### 3. Who are we

When we say "we" or "our" we mean Cirencester Friendly, who is the 'data controller' for the information in this overview. This means we're responsible for deciding how we can use your information.

#### 4. The information we collect

We collect information about you from different places including:

- directly from you
- from a third party acting on your behalf e.g. an agent
- from publicly available sources
- when we generate it ourselves
- from other organisations.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you apply for, currently hold or have held in the past. You're responsible for making sure you give us accurate and up to date information. If you provide information for another person (you must have obtained that person's consent to both disclose, and the processing of that personal data in accordance with the privacy notice), you'll need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

#### 5. How we'll use your information

We'll use it to provide any products and services you've requested and other purposes e.g.:

- 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 products 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 Checks
- h) Comply with our legal and regulatory obligations.

We'll only use your information where we're allowed to by law e.g. carrying out an agreement we have with you, fulfilling a legal obligation, because we have a legitimate business interest or where you agree to it.

#### 6. Who we can share your information with

We may share your information across other business line of our business, to third parties for money laundering checks, credit risk reduction and other fraud crime prevention purposes. To other prospective buyers in the event we sell any part of our business, to any regulator, external auditor or applicable body or to the court where required to by law. To any central or local government, statutory or public body.

#### 7. How long we'll keep your information

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 legal, regulatory or contractual obligations. You have the right to request we erase your data, where we do not have any overriding legal, regulatory or contractual obligations for continued retention of such data.

# 8. Transferring your information overseas

Personal data that we collect, is stored in the UK and not outside the European Economic Area. Should we need to transfer personal data 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 outside of the UK or European Economic Area, we will notify you.

## 9. Your rights

You have a number of rights relating to your information e.g. to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc.

We do not perform any auto-profiling of individuals.