

## General Privacy Notice

### How we protect and use your information

This is our Privacy Notice, a legal requirement of the General Data Protection Regulation (GDPR), which takes effect from 25 May 2018. It sets out how we collect, use, store and safeguard personal data together with details about our obligations under the GDPR.

We have tried to write this guide in plain English but if you have any questions then please get in touch by telephone, email or post.

This is our general Privacy Notice for members and prospective members. We also have a specific Privacy Notice for our website which includes details of how we use cookies. You can get copies of this by contacting us.

#### Our data promise:

- To be open and transparent about the way we use information about you.
- To treat data ethically and look after it securely.
- Never to sell or pass on your data for other organisations to market their products to you.

#### Healthy Investment

Healthy Investment is the trading name of The Rechabite Friendly Society Limited. We are a mutual friendly society and, as a financial services provider we are authorised by the Prudential Regulation Authority (PRA) and authorised and regulated by the Financial Conduct Authority (FCA).

You can contact our Data Protection Officer:

By post: 2 The Old Court House, Tenterden Street, Bury BL9 0AL

By email: [data@healthyinvestment.co.uk](mailto:data@healthyinvestment.co.uk)

By telephone: 0161 762 5790

Online: [www.healthyinvestment.co.uk](http://www.healthyinvestment.co.uk)

Healthy Investment is, for the purposes of GDPR, a Data Controller.

#### What is personal data?

It is information about you. It includes information that is capable of identifying an individual and includes but is not limited to:

- Name.
- Contact details including address, telephone numbers and email addresses, date of birth and National Insurance Number.

- Premium, payment and direct debit details.
- Basic health information for some policies which include life insurance.
- If you have a Tax Exempt Savings Plan with another friendly society.
- Details of any investment with another provider you are transferring to us.
- The personal details of anyone you are investing for.
- Your views and opinions on our products and service.
- Recordings of telephone calls.

### **How do we collect this information?**

Most of the personal data we hold will have been provided by you when you complete a paper or online enquiry, application or claim form, when you write to, telephone or email us or when you register on our website.

We may use a credit reference agency to confirm your identity as required by anti-money laundering rules.

If you have arranged your investment through a financial adviser or following an introduction, they may have passed on to us information you have given them. We will ensure that they have obtained consent from you to share your data with us.

In the event of a claim for life insurance over a set limit, we may write to your doctor to establish if the medical information you gave us on your application form was accurate. As this information is only relevant to a claim for life insurance, it is outside of the scope of GDPR.

If you have a Child Trust Fund with us and it was allocated by HMRC, they will have supplied details of the child and parent or guardian to us.

If you use our website we automatically collect details of how you access the site and which pages you have visited. You can find out more about website data from our website Privacy Notice which is available at: [www.healthyinvestment.co.uk/privacy-notices](http://www.healthyinvestment.co.uk/privacy-notices) or you can contact us for a copy.

### **Accuracy of the information we hold**

It's really important to us that the information we hold is accurate and up to date. If any of your personal details, such as your name or address, change please let us know as soon as possible. This helps to ensure that we can provide you with the highest level of service possible and that we don't send correspondence regarding your investment to an old address.

If you believe that any information we hold is incorrect or incomplete then please get in touch with us and we will correct it promptly.

## **Why do we need your personal information and how do we use it?**

If you have made an enquiry regarding the products we provide, we need your details in order to send information to you.

We need your personal data in order to set up and manage your investment or policy.

The legal basis for holding your details is for the performance of a savings, investment or insurance policy and to administer your membership of the Society. If you do not provide this information, we may not be able to provide you with information or offer our products to you.

We record telephone calls so that we can reduce the need for written confirmation of instructions about your investment, to monitor the way our staff deal with members and to help train our staff to provide you with the best possible service.

We use the views and opinions you share with us to help improve our products and service.

We need some data in order to comply with the rules of the PRA, FCA and HMRC tax legislation.

As a mutual friendly society, we also need your details in order to ensure that we manage your membership of the Society in accordance with the Society's rulebook. This includes, but is not limited to, inviting you to our Annual General Meeting.

The data we collect automatically when you use our website helps us to analyse its use, improve the website and make it more accessible.

If in the future we intend to collect or process your personal data for a purpose other than that for which it was collected then we will provide you with relevant information.

## **How we communicate with you**

We need to provide you with information regarding your investment with the Society and in relation to your membership.

If you have provided us with your email address we will, wherever we can, send this information by email, however you can ask us to send it by post if you prefer simply by contacting us. We do not need your consent to send this information.

We may send you information regarding additional investments, new products, general news about the Society and other products by post or telephone. If you do not want to receive this you can tell us and we will not send it.

If you have given us permission we will send this information by email, but we can only do this if you have given us express permission (consent).

We also have a regular newsletter that we can send by email, but we can only send this if you have given us permission.

On your application form, when you apply online, while using our website, over the telephone, by email or in writing, or by using the AGM or Bonus Notice reply cards, you can consent to be included in these communications and your personal data may be used by the Society for marketing purposes.

You can give this permission and sign up to our newsletter on our website [www.healthyinvestment.co.uk](http://www.healthyinvestment.co.uk).

If you want to change the way we communicate with you, receive our newsletter or give consent to receive information by email, simply email us [data@healthyinvestment.co.uk](mailto:data@healthyinvestment.co.uk) or get in touch by telephone or post.

### **Who has access to your information?**

You have the right to access all the data we hold about you. We explain more about this in the section on access rights.

Our staff may need to access your information in order to manage your investment, deal with your enquiries or pay out any claims.

We will not pass on your personal information to any other company, organisation or individual for them to market or sell anything to you. We will not sell, trade or rent your personal data to any third parties.

If we are required by law, we may have to pass on information to legal and regulatory authorities including, but not limited to, our Auditors, HMRC, PRA, FCA or for anti-money laundering and fraud prevention to the police.

We may pass on your information to third party service providers for the sole purpose of providing services on behalf of the Society. An example of this would be the printer who prepares the notices for our AGM. When we use third parties we only share the information that is necessary and they have to sign a formal Data Sharing Agreement which gives assurance that they will keep it safe and destroy it as soon as they have finished using it.

If you have arranged your investment through an FCA authorised financial adviser, we will continue to share information with them about the performance of your investment. You can ask us at any time to stop sharing this information with them.

If you have been introduced to the Society by an Introducer, we will not share any details about your policy or its performance, other than if it has been taken out or cancelled, with them.

### **Will my details ever be transferred outside of the European Economic Area (EEA)?**

If you are receiving information regarding your policy or the Society by email, or you have agreed to receive our email newsletter and other marketing emails, then on occasion we use external companies to manage the distribution and sending of these messages. At present we use Campaign Monitor (Freshview Pty Ltd.) who collect just names and email addresses.

On occasion we use a company called Survey Monkey to undertake surveys on your views and opinions.

Both of these companies are based in the United States so your name and email address may be transferred outside the EEA. We have Data Processing Agreements in place and both companies comply with the EU and US Privacy Shield Framework.

We reserve the right to use other overseas companies to manage the distribution of emails and the collection of your opinions. However we will only do this if we are confident they have appropriate security arrangements in place.

We will not send these companies any other personal data and we will not transfer any personal information to any other company or organisation outside the EEA unless we are compelled to do so by law.

If you use our website you should read our Privacy Notice for website users, which provides full details of how the data collected through it is managed and protected.

If you use our social media sites (Facebook, Twitter and LinkedIn) these companies are based overseas so information you post on these will be transferred outside of the EEA.

### **How do we keep your data secure?**

All of the data we hold we store in the UK.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place physical, electronic and managerial procedures to keep it safe.

Our premises are secure and all data is locked away at night.

We do not store any personal data on laptops or other portable devices.

We use up to date industry standards to keep your personal data as secure as possible against loss, unauthorised disclosure or access.

Our website has an enhanced validation SSL certificate to ensure all data that is submitted online is encrypted during transmission. All data held on the website server is encrypted for additional security.

The Society uses email security software to filter the content of inbound and outbound emails and protect mailboxes from targeted attacks.

The Society's main network servers are backed up daily using encryption software.

The Society is working towards certification by the National Cyber Security Centre.

### **How long do we keep information about you?**

Your personal data will be stored for a reasonable period after your policy ends or you cash in your investment so that we can fulfil our legal and statutory obligations. After this it will be securely destroyed.

How long we retain the information depends on the type of policy you hold.

We review our data retention policy on a regular basis so that we do not keep it longer than necessary.

Information collected automatically when you use our website will only be stored as long as we need it.

### **Your right to access and amend your data.**

You, as the data subject, have a number of rights under the GDPR.

#### **Right to access**

You have a right to access the personal data that the Society holds about you. This is known as a 'subject access request'. We shall respond promptly, and within one month of receiving the request and all the necessary information from you. Our formal response to you shall include details of the personal data we hold about you, including:

- Where we have acquired the information.
- Why we are holding the information.
- Details of anyone we have shared the information with.

#### **Right to rectification (correction)**

You have the right to have any personal data we hold corrected if it is inaccurate or incomplete. We will respond within one month of receiving a request for your personal data to be rectified.

#### **Right to erasure**

You have the right to request the deletion or removal of your personal data in specific circumstances, subject to legal requirements. We will erase your data without undue delay should we receive a request.

#### **Right to restrict processing**

In certain circumstances you have the right to ask us to restrict how we use your data.

### Right to data portability

You have the right to ask for your personal data from us so that you can move, copy or transfer the data to another data controller. We will provide your data in a structured, commonly used and machine readable format in a safe and secure way.

### Right to object

You have the right to object to us processing your personal information where it may cause damage or distress where processing is based on legitimate interests or the performance of a task in the public interest, direct marketing (including profiling) or for purposes of scientific and historic research and statistics.

### Automated processing

We do not undertake any processing by automated means, this includes making decisions without any human involvement and evaluating certain things about you, known as 'profiling'.

### What happens if we update our Privacy Notice?

If we want to use your personal data in a way that we have not explained in our Privacy Notice we will ask your permission first.

Our Privacy Notice is reviewed regularly to make sure we continue to meet the highest standards of data security and to protect your privacy.

We can at any time update, modify or amend this Notice. The latest version is always available on our website or from this office. We suggest that you review this Privacy Notice from time to time to ensure you are aware of any changes we may have made. However if we were making a significant change to how we use information you have already given to us we would seek your agreement first.

### What to do if you have a complaint?

We will take any concerns you have very seriously. However after we have tried to resolve your complaint you remain dissatisfied, you have the right to refer us to the Information Commissioner's Office (ICO). You can do this if you believe we have misused or not kept your data secure or if you believe that we have not complied with the requirements of the GDPR. You can contact the ICO on 01625 545745 or 0303 123 1113 or write to Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

### How to contact us.

If you have any questions which are not answered by this Privacy Notice, or you have any concerns about how we have or could use the personal data we hold, then please get in touch:

By post: 2 The Old Court House, Tenterden Street, Bury BL9 0AL  
By email: [data@healthyinvestment.co.uk](mailto:data@healthyinvestment.co.uk)  
By telephone: 0161 762 5790  
Online: [www.healthyinvestment.co.uk](http://www.healthyinvestment.co.uk)

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Authorised by the Prudential Regulation Authority and Regulated by the Financial  
Conduct Authority and the Prudential Regulation Authority.  
Financial Services Register 109994.