

Privacy notice for our intermediaries

Registered name: The Original Holloway Friendly Society Limited

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact details

✉ Post: Holloway House, 71 Eastgate Street, Gloucester, Gloucestershire, GL1 1PW

☎ Telephone: 0800 0931 535

@ Email: dataprotectionofficer@holloway.co.uk

For large print, braille or audio communications please call us on 0800 093 1535

What information we collect and use, and why

- We collect or use the following information for the **operation and administration of your intermediary firm:**

- Name and contact details such as name, job title, and work email address
- Date of birth
- Job role and FCA number
- Audio recordings (e.g. calls)
- Date relationship starts and communication history
- Records of meetings and decisions
- Technical data, including information about browser and operating systems and IP addresses

We also collect or use the following personal information **for the prevention, detection, investigation or prosecution of crimes:**

- Name and contact details such as name, job title, and work email address
- Date of birth
- Job role and FCA number
- Audio recordings (e.g. calls)
- Date relationship starts and communication history
- Records of meetings and decisions
- Financial information e.g. for fraud prevention or detection

We also collect or use the following information to **provide and improve products and services for you or your intermediary firm:**

- Name and contact details such as name, job title, and work email address
- Usage data (including information about how you interact with and use our website, products and services)
- Technical data, including information about browser, operating systems and IP address

We collect or use the following personal information for **information updates or marketing purposes**:

- Name and contact details such as name, job title, telephone number, post code and work email address
- Marketing preferences
- Website and user journey information
- IP address

We collect or use the following personal information for **research or archiving purposes**:

- Name and contact details such as name, job title and email address
- Date relationship starts and ends
- Sales performance data

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right [here](#).
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right [here](#).
- Your right to erasure - You have the right to ask us to delete your personal information. You can read more about this right [here](#).
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. You can read more about this right [here](#).
- Your right to object to processing - You have the right to object to the processing of your personal data. You can read more about this right [here](#).

- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right [here](#).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information are:

- Consent - we have permission from you after we gave you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time
- Contract – we must collect or use the information so we can enter or carry out a contract with you. All your data protection rights may apply except the right to object
- Legal obligation – we must collect or use your information so we can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All your data protection rights may apply, except the right to object and the right to portability
- Public task – we must collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All your data protection rights may apply, except the right to erasure and the right to portability
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - **To provide and improve products and services for you or your intermediary firm.**

We may use personal data to keep you informed about our products and services which may be of interest to you

- **For the operation and administration of your intermediary firm**

We may use personal data to set up and maintain your account so you're able to introduce business or, to pay and reclaim commission. We may also use personal data to administer and manage policies that your clients have with us

- **For information updates or marketing purposes**

To keep you updated with changes made to our existing products or provide you with details of new products and services

- **For research or archiving purposes**

To carry out aggregated and anonymised research about how our products, services, and systems are used, or if you choose to participate in surveys and research campaigns

Where we get personal information from

- Directly from you, your intermediary firm or our Members
- Publicly available sources
- Credit reference agencies
- Suppliers and service providers

How long we keep information

We'll keep information about you for the duration of your relationship plus 5 years, or after 1 year if you haven't sold our insurance.

Who we share information with

When necessary, we share your personal information with:

- Credit Reference Agencies
- Debt management or collection agencies
- Other financial or fraud investigation authorities
- Other financial advisers
- Professional or legal advisors
- Insolvency practitioners

- Regulatory authorities
- Internal and external auditors
- Organisations we're legally obliged to share personal information with
- Suppliers and service providers

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

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

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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Holloway Friendly is the trading name of The Original Holloway Friendly Society Ltd. Holloway Friendly is registered and incorporated under the Friendly Societies Act 1992, registered No. 145F. Registered office: Holloway Friendly, Holloway House, 71 Eastgate Street, Gloucester, GL1 1PW. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. FRN 109986.