Privacy notice for our Members

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, use, and why

We collect or use the following personal information **to provide and administer our Members insurance and pay claims:**

- Name and contact details such as name, address, job title, telephone number and email address
- Gender
- Occupation
- Date of birth
- Lifestyle information (for example relating to your lifestyle and hobbies)
- Third party information (such as family members or other relevant parties)
- Financial data (including income, and any continuing income, expenditure or other insurance arrangements)
- Employment details (including employment status, salary, hours worked and sick pay)
- Identification and financial documents (including bank/building society statements, passport or drivers' licence)
- Social media networking and video/image sharing platforms (e.g. Facebook, LinkedIn, Strava, X, Instagram, TikTok, YouTube, Pinterest)
- Audio recordings (e.g. calls)
- Marketing preferences
- Insurance records and notes
- Details of payments made to and from your accounts
- 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 also collect or use the following information **to provide and administer our Members insurance and pay claims**. This information is subject to additional protection due to its sensitive nature:

- Genetic information
- Health information (such as medical records, consultation reports, health conditions or family history)

We collect or use the following information **to improve products and services for our Members:**

- Gender
- Occupation
- Date of birth
- Lifestyle information (for example relating to your lifestyle and hobbies)
- Employment details (including salary and sick pay)
- Information relating to feedback or complaints

We also collect or use the following information **to improve products and services for our Members.** This information is subject to additional protection due to its sensitive nature:

- Genetic information
- Health information (such as medical records or health conditions)

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

- Name and contact details such as name, address, job title, telephone number and email address
- Insurance records
- Call recordings
- Insurance records and notes
- Details of payments made to and from your accounts
- Identification and financial documents (including bank/building society statements, passport or drivers' licence)
- Social media networking and video/image sharing platforms (e.g. Facebook, LinkedIn, X, Instagram, TikTok, YouTube, Pinterest)
- IP address

We collect or use the following personal information **to keep our Members updated and for marketing purposes:**

- Name and contact details such as name, address, job title, telephone number and email address
- Profile information
- Marketing preferences
- Date insurance purchased and insurance history
- 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 also collect or use the following information **to keep our Members updated and for marketing purposes.** This information is subject to additional protection due to its sensitive nature:

- Health information (such as medical records or health conditions)

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

- Date of birth
- Address
- Date insurance purchased and ends
- Insurance history
- Lifestyle information (for example relating to your lifestyle and hobbies)

We also collect or use the following information for **research or archiving purposes**. This information is subject to additional protection due to its sensitive nature:

- Health information (such as health conditions)

We collect or use the following personal information **to comply with legal requirements:**

- Name and contact details such as name, address, telephone number and email address
- Date of birth
- Identification and financial documents (including bank/building society statements, passport or drivers' licence)

- Employment details
- Insurance records and notes
- Details of payments made to and from your accounts
- Any other personal information required to comply with legal obligations

We collect or use the following personal information **to protect our Members welfare:**

- Name and contact details such as name, address, telephone number and email address
- Insurance records and notes
- GP contact details

We also collect or use the following information **to protect our Members welfare**. This information is subject to additional protection due to its sensitive nature:

- Health information (such as medical records or health conditions)

We collect or use the following personal information for **dealing with complaints**:

- Name and contact details such as name, address, telephone number and email address
- Third party information (such as family members or other relevant parties)
- Financial data (including income, and any continuing income, expenditure or other insurance arrangements)
- Employment details (including employment status, salary, hours worked and sick pay)
- Lifestyle information (for example relating to your lifestyle and hobbies)
- Identification and financial documents (including bank/building society statements, passport or drivers' licence)
- Social media networking and video/image sharing platforms (e.g. Facebook, LinkedIn, Strava, X, Instagram, TikTok, YouTube, Pinterest)
- Call recordings
- Insurance records and notes
- Details of payments made to and from your accounts
- IP address

We also collect or use the following information for **dealing with complaints**. This information is subject to additional protection due to its sensitive nature:

- Health information (such as medical records or health conditions)

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**.

- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. 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 our Members**

    We may use personal data to develop our business so we can run Holloway Friendly effectively for current and future Members. We may also use personal data to test or develop and improve our processes, systems and policies

  - **For the operation of our Members insurance**

    We may use personal data to reconcile the payments you make, or we make to you or our suppliers. We may also use personal data to let you know how to manage or update your insurance, respond to queries or complaints and pay claims.

    We may also share medical data with our Chief Medical Officer to seek expert medical advice to help assess and pay claims

- **For the prevention, detection, investigation or prosecution of crimes**

We may use or share personal information to keep our staff and premises safe and to prevent financial crime including fraud and money laundering

- **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
- Credit reference agencies
- CCTV footage or other recordings
- Debt collection agencies or specialists
- Financial Advisers
- GPs, health consultants or specialists
- Legal bodies or professionals (such as courts or solicitors)
- Publicly available sources such as social media networking and video/image sharing platforms
- Previous or current employment
- Suppliers and service providers

How long we keep information

If you decide not to take out your insurance or cancel it within the cancellation period, we'll keep your information for up to 3 years. We'll keep other information about you for the duration of your insurance plus 6 years, in line with our regulatory obligations.

Who we share information with

When necessary, we share your personal information with:

- Actuarial service providers
- Credit reference agencies to perform credit, identity and fraud prevention checks against public (electoral register) and shared credit information
- Debt collection agencies or Insolvency practitioners
- Emergency services
- Financial Advisers
- Fraud prevention and/or law enforcement agencies
- Internal and external auditors
- Insurance companies, brokers or other intermediaries
- Previous and current employers
- Professional or legal consultants, courts, and/or other relevant third parties connected with legal proceedings or claims
- Reinsurers
- Suppliers and service providers
- Tax, government, and any relevant regulatory authorities
- Third parties where you have asked us to share your information
- Third parties where it's necessary to enter into, or necessary for the performance of a contract
- Third parties where we are required to do so by law

All companies we work with are assessed for adequacy of their security controls, so we can keep your personal data is safe.

Sharing information outside the UK

Where necessary, our data processors may share 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 data protection complaint to us using the contact details at the top of this privacy notice. You can view our complaints procedure at this link: **holloway.co.uk/docs/download/-complaints-procedure-guide.pdf**

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

Last updated

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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.