

Privacy Policy

Last updated April 2026

Our Privacy Policy explains when and why we collect, store, use and share personal information about our customers. It applies to personal information provided, either by you or by others on your behalf and explains the rights you may have in relation to the personal information that we hold on you.

You can read our privacy policy in full or use the links below to read a particular section. If you would like to print a copy of our Privacy Policy you can download the full version, available [here](#).

Open each section to find out more about how we process your personal data.

About Us

This privacy policy applies to Scottish Friendly group of companies' offering a wide range of financial products and services. Scottish Friendly is acting as a data controller with the information we process unless stated and are committed to protecting the personal information we collect.

Contact details

If you would like to contact the Scottish Friendly Data Protection Officer and their team in relation to this Privacy Policy, please use the following details:

Data Protection Officer
Scottish Friendly Assurance Society Limited
Scottish Friendly House
16 Blythswood Square
Glasgow, G2 4HJ
E-mail: dpo@scottishfriendly.co.uk

How do we collect your personal data?

The personal information we collect about you will depend on the products and services you use. We have set out below examples of the types of information we may collect about you. We may receive this information from:

- You (including the devices that you use to contact us)
- Third parties we work with such companies who distribute our products, your solicitor, health professional, or employer
- Research organisation we use or
- Information that is publicly available

Where you provide information about other people, we expect you to be responsible for ensuring that they know we are using their personal information in accordance with this Privacy Policy and that you have obtained their consent.

We may ask you for, or you may voluntarily provide, sensitive information such as health information. For example, we may request this information when you purchase health insurance policies from us or you may provide us with details of your health to help us to understand your specific circumstances, we will use it make appropriate adjustments to the products and services we offer based on the information you provide.

Special category data will only be used with your consent, unless the law permits us to use such information without your consent.

Scottish Friendly will process personal data for any of the following processes depending on the nature of the relationship you have with us. The following sections will explain what these are.

Making an application

SFA will collect and process your personal data to allow you to make an application to one of our products or services. These applications will be made on our website or on one of our administrators' websites or they will be made with an advisor over the phone. We will also receive information via email or post where we require further information from you.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Proof of identity	• Passport • Driving license • Utility bill • Birth certificate • Marriage Certificate
Family details regarding	• Spouse • Partner • Joint applicant • Next of kin • Dependants • Designated beneficiary or trustee
Financial Information	• Bank Details
Professional advisers' details	• Financial Advisers
Special Category data	• Sex life/sexual orientation – by association by advising us details of your spouse or partner
Information from devices you use when you use our website or download and install our mobile app	• IP address (internet protocol address) • Screens you access, time and date you access the mobile app, make and model of your mobile device, the operating system like iOS or Android • Please see our Cookies policy on our website for more information.

Our lawful basis for processing your personal data is in connection with meeting our legal and regulatory obligations under our FCA licence as well as to allow us to meet our obligations under any contract we agree with yourself.

Administering your Policy/Product

Scottish Friendly will process your personal data to administer and keep you informed in relation to your policy. This will include updating records, keeping you up to date with your policy, provisions of communication (email/letter depending on your preference) as well as ensuring you receive any monies you are due.

Personal data is typically collected from you via your application but can also be collected via our web forms or through our mobile app, over the phone to our contact centre, by post or email, or through a third party acting on your behalf such as a financial advisor, Solicitor or other third party with authority.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Proof of identity	• Passport • Driving license • Utility bill • Birth certificate • Marriage Certificate
Family details regarding	• Spouse • Partner • Joint applicant • Next of kin • Dependants • Designated beneficiary or trustee
Financial Information	• Bank Details
Professional advisers' details	• Financial Advisers • Solicitors

Administering your Policy/Product

Information we may collect	Examples of personal information we may collect
Special Category data	- Physical - Mental - Medical history - GP details - Racial or ethnic origin - Political opinions - Religious or philosophical beliefs - Trade union membership - Genetic data - Sex life/sexual orientation
Information from devices you use when you use our website or download and install our mobile app	- IP address (internet protocol address) - Screens you access, time and date you access the mobile app, make and model of your mobile device, the operating system like iOS or Android - Please see our Cookies policy on our website for more information.
Other	- Your preferences and interests when you tell us what they are or when we deduce them from what we know about you. - Any other information you give to us

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, administer your policy on our behalf, welcome gift and benefit scheme suppliers and carry out searches that help us trace you if we lose touch.
- Reinsurers – Reinsurers help us manage our risk and so they need to see information about the policies they are reinsuring.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Our lawful basis for processing your personal data is in connection with meeting our legal and regulatory obligations under our FCA licence as well as to allow us to meet our obligations under any contract we agree with yourself.

ID, AML and Anti-Fraud checks

Scottish Friendly will process your personal data to allow us to complete checks on your identity as well as checks to allow the prevention and detection of crime including fraud, money laundering and obligations to check sanctions lists.

The information we use will be received either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney). We will also receive information back as part of these searches.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Proof of identity	• Passport • Driving license • Utility bill • Birth certificate • Marriage Certificate
Family details regarding	• Spouse • Partner • Joint applicant • Next of kin • Dependants • Designated beneficiary or trustee
Financial Information	• Bank Details
Other	• Any other information you give to us

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, complete AML searches and review sanction lists
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Our lawful basis for processing your personal data is for the prevention of crime in relation to fraud, money laundering and obligations to check sanctions list as well as to meet our legal and regulatory requirements including requirements of our FCA licence conditions.

Making a Claim

Scottish Friendly will process your personal data to allow us to process a claim made by you in relation to an insurance product. Depending on the product and the claim this will include special category data such as health information as well as other information we receive as part of the claims process.

We will receive this information directly from yourself or an authorised third-party representative by phone/post or email. We will also receive information from professionals such as your GP or other medical professionals to allow us to assess the claim.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Family details regarding	• Spouse • Partner • Joint applicant • Designated beneficiary or trustee
Financial Information	• Bank Details
Special Category data	• Physical • Mental • Family • Medical history • GP details • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data • Sex life/sexual orientation
Claim	• Details of a claim and why you are making it
Other	• Any other information you give to us

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, administer your policy on our behalf, welcome gift and benefit scheme suppliers and carry out searches that help us trace you if we lose touch.
- Reinsurers – Reinsurers help us manage our risk and so they need to see information about the policies they are reinsuring.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Our lawful basis for processing your personal data is in connection with meeting our legal and regulatory obligations under our FCA licence as well as to allow us to meet our obligations under any contract we agree with yourself.

Providing Extra Support

Sometimes our customers may need some extra support or help for a number of reasons whether this be a medical condition, financial troubles or a change of circumstances. We refer to these as ‘vulnerabilities’ as this may limit your access to achieving the best outcome our products can offer.

Scottish Friendly will process your personal data to allow us to record any ‘vulnerabilities’ that you may have whether this maybe physical, mental, financial, long term or short term. The recording of ‘vulnerabilities’ will allow us to make relevant adjustments to support you whilst you are our customer.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender
Special Category data	• Physical • Mental • Family • Medical history • GP details • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs
Professional advisers’ details	• Financial Advisers • Solicitors
Other	• Any other information you give to us

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, administer your policy on our behalf, welcome gift and benefit scheme suppliers and carry out searches that help us trace you if we lose touch.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Our lawful basis for processing your personal data is in connection with meeting our legal and regulatory obligations under our FCA licence.

General Enquiries

Scottish Friendly will process your personal data to allow you to make and us to respond to general enquiries.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Special Category data	• Physical • Mental • Family • Medical history • GP details • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs
Professional advisers' details	• Financial Advisers • Solicitors
Financial Information	• Bank details
Information from devices you use when you use our website or download and install our mobile app	• IP address (internet protocol address) • Screens you access, time and date you access the mobile app, make and model of your mobile device, the operating system like iOS or Android • Please see our Cookies policy on our website for more information.
Other	• Any other information you give to us • Recording of telephone calls

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, administer your policy on our behalf, welcome gift and benefit scheme suppliers and carry out searches that help us trace you if we lose touch.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Our lawful basis for processing your personal data is to meet legitimate interests. Our legitimate interests is to allow us to meet our customers' needs. Our customer's legitimate interest to ensure that they are not being disadvantaged by any vulnerability.

Complaints and Legal Claims

Scottish Friendly will process your personal data to allow you to make, to allow us to investigate any complaints that have been raised as well as defend any legal claims made against us.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Gender • Marital status • Contact details • National Insurance Number
Special Category data	• Physical • Mental • Family • Medical history • GP details • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs
Professional advisers' details	• Financial Advisers • Solicitors
Financial Information	• Bank details
Other	• Any other information provided to us as part of the complaint or claim

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, administer your policy on our behalf, welcome gift and benefit scheme suppliers and carry out searches that help us trace you if we lose touch.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.
- Courts and those involved in any legal process – If a court requires us to disclose your information or if it needs to be disclosed as part of a legal process.

Our lawful basis for processing your personal data is to meet our legal and regulatory requirements associated with our FCA licence conditions.

Getting Back in touch

There are some instances where we have lost contact as correspondence, we have sent them has been returned as no longer at the address. Scottish Friendly will process your personal data to allow us to track customers who have lost contact with Scottish Friendly but still have an open active product with us. This way we can get back in contact and advise them of the status of their product.

We will use the information that you have already provided us directly or from an authorised third-party representative by phone/post or email to complete the search as well as information provided by credit reference agencies to identify any updated contact details (such as address) so that we can get back in contact with our active customers.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Name • Address • Date of birth • Contact details • National Insurance Number

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do; in order to fulfil some of our business requirements for example carry out searches that help us trace you if we lose touch.

Our lawful basis for processing your personal data is to allow us to meet our contractual obligations with our customers.

Payments in and out

Scottish Friendly will process your personal data to allow you to make to us and for us to make payments to yourself.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Contact details
Family details regarding	- Spouse - Partner - Joint applicant - Next of kin - Dependants - Designated beneficiary or trustee
Financial Information	Bank details
Other	- Any other information you give to us - Feedback and reviews provided as part of these processes

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, manage payments in and out of the business

Our lawful basis for processing your personal data is to meet our contractual obligation with yourself.

Customer Segmentation and Profiling

Scottish Friendly will process your personal data to analyse and segment our customers to allow us to better understand our customer base as well as how to best communicate and improve our services. This profiling does not have any legal or significant effect on any individuals.

Information will come from yourself when you sign up to one of our products or services and will be used in conjunction with information provided by a third party to help us identify the best segmentation that you are in.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Address - Contact details - DOB - Products and services taken out
Other	Your preferences and interests when you tell us what they are or when we deduce them from what we know about you.

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to fulfil some of our business requirements for example, helping Scottish friendly analyse data and suitably segment our customer base.

Our lawful basis for processing your personal data is legitimate interest. Our legitimate interest is so that we can better communicate and support our customer and potential customers with relevant messages and information whether it is to nurture and engage with customers about their current investments with us or to make them aware of products and services we offer them.

Marketing communication with customers and potential customers

Scottish Friendly will process your personal data to send marketing communications to individuals to make them aware of products and services that we offer.

As part of this process, we may profile customers to make sure they are notified of the most relevant products and services to their situation. This profiling will not have a legal or significant effect on any individual.

Information will be provided by yourself either by signing up to one of our products or signing up to one of our marketing lists.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Contact details - Policy Type
Information from devices you use when you use our website or download and install our mobile app	Please see our Cookies policy on our website for more information.
Other	Your preferences and interests when you tell us what they are or when we deduce them from what we know about you.

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to allow us to send marketing communications to our customers via different methods (e.g. email, post, push notifications) as well as manage any opt outs

Our lawful basis for processing your personal data is consent. We will only send marketing communications to individuals who have consented to receive this type of communication.

Nurture communication with customers and potential customers

Scottish Friendly will provide information to our customers to help them understand their product, what is happening with their product and what external events may impact their product (e.g. budget updates). We refer to these communications as ‘nurture communications’.

We may process personal data to send nurture communications to customers to help them understand their current product and how the current economic climate affects their policy or product.

As part of this process, we may profile customers to make sure they are notified of the most relevant information to their situation. This profiling will not have a legal or significant effect on any individual.

Information will come directly from yourself when you sign up to one of our products.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Contact details - Policy Type

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to send these nurture communications to you.

Our lawful basis for processing your personal data is legitimate interest. We have a legitimate interest to communicate information that will allow you to understand your product better.

You have the right to opt-out of these communications at any time – you can do this by sending an email to us at opt-out@scottishfriendly.co.uk or by sending any other form of communication to Scottish Friendly.

Prize Draws

Scottish Friendly will occasionally create a prize draw which will allow customers to enter to win a prize. This information will be used to identify a winner and contact them and arrange for a prize to be sent to them.

The information will be collected from the individuals who are entering the prize draw or from when they purchase their product.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Basic personal details	- Name - Address - Date of birth (where relevant) - Contact details
Other	Information you provide when entering prize draws, competitions

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, such as provide, maintain and keep our systems which hold this information secure.

When you are automatically entered into our prize draws by creating an account or investing with us, our lawful basis for processing your information is legitimate interests. We have a legitimate interest in promoting our business by offering you, as a customer, the opportunity to automatically participate in our prize draws.

You have the right to opt-out of our prize draws at any time – you can do this by sending an email to us at opt-out@scottishfriendly.co.uk or by sending any other form of communication to Scottish Friendly.

Customer Surveys and Customer Feedback

Scottish Friendly will process your personal data to allow you to make and to allow us to contact you to request that you provide customer feedback or to complete customer surveys.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Contact details
Other	- Any other information you give to us - Feedback and reviews provided as part of these processes

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf - We use service providers, who agree to treat your data as securely as we do, in order to allow you to provide customer feedback and to analyse responses which allows us to identify way we can improve our service.

Our lawful basis for processing your personal data is to meet our legitimate interests to allow us to ensure we are providing a good service and identify improvements to services and products we provide.

Customer Research

Scottish Friendly may process your personal data to allow you to take part in research projects about work that Scottish Friendly undertakes. This information will be used to contact you so that you can take part if you wish as well as to allow us to analyse responses and results of any research work that is completed.

We will receive this information either directly from yourself or from an authorised third-party representative by phone/post or email (e.g. a solicitor who now has power of attorney).

Scottish friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	- Name - Contact details
Other	- Any other information you give to us - Feedback and information provided as part of these processes

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf - We use service providers, who agree to treat your data as securely as we do, in order to allow us to carry out these processes efficiently and without bias.

We process your personal data based on our legitimate interests. This allows us to better understand the needs and preferences of our customers and research participants, helping us to improve and develop our products and services.

Call recordings

Scottish friendly may record inbound and outbound calls made into our contact centre. These calls are recorded for the purpose of:

- Staff training and quality monitoring of staff
- To investigate and resolve a complaint; and
- For the detection, investigation and prevention of crime

We will receive this information directly from yourself when you make a call to our contact centre.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may process	Examples of personal information we may collect
Basic personal details	• Details will differ depending on the content of the call
Special Category data	• Details will differ depending on the content of the call
Other	• Any other information you give to us • Recording of the telephone call • Call information i.e. telephone number, time and duration of the call

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, in order to record and listen to call recordings where there is a need to do so.
- Anyone you ask us to share your information with – If you ask us to share your information, for example with a trustee or professional adviser, we may check with you to confirm that the person asking for information on your behalf has your permission.
- Regulatory, Government and Industry Bodies – To comply with our legal and regulatory obligations, this may include acting in accordance with best practice.

Recording of calls is necessary to protect the interests of you, our staff or both. Our lawful basis for processing your personal data is legitimate interests, unless those interests are overridden by you asking for your call not to be recorded. You may request that your call isn't recorded, and, in this situation, you will normally be advised to contact us either in writing or by email.

Closed Circuit Television (CCTV)

Scottish Friendly operates CCTV at our office for the purpose of maintaining the security of property and premises, site safety and the detection and prevention of crime.

This information is captured using CCTV cameras when anyone visits our office.

Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Other	CCTV image if you visit our office

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – CCTV technology provider to allow us to carry out the processing.

Scottish Friendly typically do not routinely share CCTV footage with third parties but will do so in certain circumstances (e.g. where we are obliged to do so by certain bodies of authority for official or criminal investigations).

The lawful basis for the processing of this data is to protect the vital interests of individuals accessing the sites, and in the legitimate interests of Scottish Friendly to protect their employees and property.

Memberships and delegates

As a Friendly Society, whenever you purchase a product from us you become a member of our Friendly Society. If you become an elected delegate, you will be added to a register of delegates.

As part of our legal obligations, we are obliged to share the register of delegates to members upon request which includes name, address, date elected a delegate and the district member group they represent.

We may also use your member information to contact you with information regarding Scottish Friendly such as notifying you of AGMs and outcome of meetings and AGMs and updates to the society.

If you are a delegate, Scottish Friendly may collect and/or process the following categories of personal data:

Information we may collect	Examples of personal information we may collect
Basic personal details	- Name - Address - Date of birth - Contact details - When eligible to vote at Scottish Friendly

If you are a member the information collected is the same as what is collected when you purchase a product from us.

We may share data as part of this process with the following parties:

- Suppliers who provide services on our behalf – We use service providers, who agree to treat your data as securely as we do, such as provide, maintain and keep our systems which hold this information secure.

Our lawful basis for processing your personal data is in connection with meeting our legal and regulatory obligations as a friendly society.

Where do we send your information?

Where possible, we aim to store personal data within the UK. In cases where data needs to be processed outside of the UK, we ensure that appropriate safeguards are in place. This means your personal data will only be transferred to countries or organisations that offer data protection standards equivalent to those required under UK data protection laws.

What if you do not provide personal information?

We try not to ask you for personal information that we do not need. If you do not provide certain information, we may not be able to provide a service to you. For example, if a claim form is incomplete or missing key information, we may not be able to process your claim.

Your rights

We've outlined your rights below in a simplified way. Please note that certain conditions may apply to how these rights can be exercised. If you'd like to make use of any of these rights, please contact our Customer Services Team. You can find our contact details in the 'Contact Us' section of our website. If a particular right is limited or doesn't apply in your case, we'll explain why.

- **Right to be informed** – You have the right to know how your personal information is collected and used. This is explained in our Privacy Policy.
- **Right of access (Subject Access Request)** – You can request a copy of the personal data we hold about you. This is usually provided free of charge. For your security, we'll take reasonable steps to confirm your identity before sharing any information.
- **Right to rectification** – If you believe any personal data we hold is inaccurate or incomplete, you have the right to ask us to correct it. We may ask for proof of the correct information before we correct it.
- **Right to data portability** – You can request that we transfer your personal data to you or another organisation in a commonly used electronic format.
- **Right to erasure (Right to be forgotten)** – In certain circumstances, you can ask us to delete your personal data. If we're unable to do so due to legal obligations, we'll explain why. If you ask us to stop using your data, we'll retain it securely but won't process it further.
- **Right to object** – You can ask us to stop sending you marketing communications at any time.
- **Right to restrict processing** – If you don't want us to use your data for certain purposes, you can ask us to restrict its use. We'll comply unless there's a compelling reason to continue processing.

How to update your information

It's important that the personal information we hold about you is accurate and current. If your details change, or if you believe any of the information we hold is incorrect, please let us know.

You can contact our Customer Services Team to update or correct your information at any time, free of charge.

How long do we keep your information?

We retain your personal information for as long as we have an ongoing relationship with you. Once that relationship ends, we will keep your data only for as long as necessary to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law;
- Defend or bring any existing or potential legal claims;
- Deal with any complaints regarding our products or services.

Your personal information will be securely deleted when it is no longer needed for these purposes. If, for technical reasons, we are unable to fully delete certain data from our systems, we will implement appropriate safeguards to prevent any further use or processing.

We may continue to send you marketing messages about our services for up to two years after your policy ends, unless you have opted out of receiving marketing communications.

Changing this privacy policy

We may change this Privacy Policy from time to time to keep it up to date, or to comply with legal requirements. Any changes we make in the future will be posted on the Privacy Policy section of our website, and where necessary, notified to you.

Complaints

Please let us know if you are unhappy with how we have used your personal information. You can contact us using the details in the section above, so we can deal with your concerns.

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). You can contact the ICO on 0303 123 1113 or in writing to:

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

Head office: Galbraith House, 16 Blythswood Square, Glasgow G2 4HJ
Telephone: 0333 323 5433 www.scottishfriendly.co.uk

The Scottish Friendly Marketing Group consists of the following companies:

Scottish Friendly Assurance Society Limited - Life, Pensions and Investments. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Member of AFM, Member of ABI.

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