



## TRANSPORT FRIENDLY SOCIETY'S PRIVACY POLICY

### BACKGROUND:

Transport Friendly Society Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of **our members, outsource service providers and suppliers** and will only collect and use personal data in a way that is consistent with our obligations and your rights under the data protection legislation.

### Information about Us

Transport Friendly Society Limited is Registered and Incorporated under the Friendly Societies Act 1992. Register No. 434F. The Transport Friendly Society is Authorised by the Prudential Regulation Authority and Regulated by the Financial Conduct Authority and Prudential Regulation Authority.

Head Office:

Transport Friendly Society Limited  
3<sup>rd</sup> Floor Derbyshire House  
St. Chad's Street  
London WC1H 8AG

### What is this Privacy Policy?

This Privacy Policy explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### What is Personal Data?

Personal data is defined by the General Data Protection Regulation ('the GDPR') as *'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'*.

Personal data is any information about you that enables you to be identified, including your name and contact details.

The personal data that we collect is set out below.

## What are your Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a. **Your right to be informed** - You have the right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but should you have any questions please contact us to find out more.
- b. **Your right of access** - You have the right to ask us for copies of your personal information that we hold.
- c. **Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- d. **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- e. **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- f. **Your right to object to processing** - You have the right to object to the processing of your personal data for a particular purpose or purposes.
- g. **Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- h. **Rights relating to automated decision-making and profiling** - We do not use your personal data in this way.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Further information about your rights can be obtained from the Information Commissioner's Office (ICO). If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the ICO. Their contact details are as follows:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Helpline number: 0303 123 1113

## What Personal Data do we collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Address;
- Email address;
- Telephone number;
- Employer;
- Organisation name;
- Job title;
- Other sensitive and/or confidential information

## **How we use your Personal Data?**

We use your personal data for the proper performance of a contract with you and you have consented to our use of your personal data and it is in our legitimate business interests to use it. Your personal data will be used for the following purposes:

- Providing and managing your account
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email or post that you have opted-in to (you may unsubscribe or opt-out at any time by contacting the Transport Friendly Society Limited.)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, and post with information, news and updates on our products and services. We will not send you any unlawful marketing information or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## **How long do we keep your Personal Data?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **How and where we store or transfer your Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us, and to protect your data, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees who have a business need to know. They will only process your personal data in accordance with our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **Do we share your Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions:

- where it is necessary in order to fulfill the service we provide to our members.
- if we are involved in legal proceedings, complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

## **Accessing your Personal Data**

You can ask us for details and a copy of what personal data we have about you. This is known as a "subject access request".

All subject access requests should be made in writing and sent to the postal or email addresses shown below. There is not normally any charge for a subject access request. If your request is '*manifestly unfounded or excessive*' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days of receiving it. We aim to provide a complete response, including a copy of your personal data within that time. If your request is complex, we may require more time, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## **Contacting us**

To contact us about anything to do with your personal data and data protection including removing your consent or to make a subject access request, please use the following details:

Postal Address:       Transport Friendly Society Limited  
                              3<sup>rd</sup> Floor Derbyshire House  
                              St. Chad's Street  
                              London WC1H 8AG

Email address:       [info@tfs.uk.com](mailto:info@tfs.uk.com)

Telephone number:   020 7833 2616

## **Privacy Policy changes**

We may change this Privacy Policy, for example, if the law changes, or if we change our business in a way that affects personal data protection. If any changes are made they will be made available on our website's privacy statement, [www.tfs.uk.com](http://www.tfs.uk.com)