

1. Introduction

This Privacy Policy tells you the data we collect, why we collect it and how we use it for processing purposes. It has been developed so you can feel confident about the privacy and security of your personal information.

Throughout the Privacy Policy references to “you” include the child where applicable. “Your” has a corresponding meaning.

2. Who are we?

We are Forester Life Limited (“Forester Life”) a company registered in England number 2997655 and a subsidiary of Foresters Financial. Foresters Financial and Foresters are trade names and trademarks of The Independent Order of Foresters a fraternal benefits society based in Canada. Our UK registered office is Foresters House, 2 Cromwell House, Bromley BR2 9BF. Forester Life Limited (hereinafter Forester Life and Foresters) is a subsidiary of The Independent Order of Foresters. Forester Life is a Data Controller according to General Data Protection Regulations (EU-GDPR).

3. What is personal information

Personal information means any information about you that identifies you, including your name, age, address, telephone number, email address, financial details, your Forester Life Plans and any other information from which you can be identified. It also includes location data and online identifiers which may identify you, such as your internet protocol (IP) address (the unique personal address which identifies your device on the internet) and mobile device IDs.

Special categories of personal information (sensitive personal information) include details in respect to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (for the purposes of uniquely identifying a natural person), medical data and sexual orientation data.

4. Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below.

1. Personal information you provide is processed fairly, lawfully and in a transparent manner.
2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose which we collected it.
3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Your personal information is kept accurate and, where necessary kept up to date.
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed.
6. We take appropriate steps to keep your personal information secure.
7. Your personal information is processed in accordance with your rights.
8. We only transfer your personal information to another country or an organisation outside the European Economic Area where we have taken the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.
9. We do not sell your personal information and we also do not permit the selling of our customers’ data by any companies who provide a service to us.

5. How do we collect your Personal Information

Whilst there are a number of ways in which we collect your personal information, the two main ways we might collect personal information about you are from things you tell us yourself, and from things we ask other people or organisations to share with us.

Things you tell us could include conversations we have on the phone, what you’ve written on an application form or information you share online. We might also collect information about you from other people and organisations, such as medical professionals and credit reference agencies, or by checking databases, such as the electoral register.

We collect personal information directly from you:

- via our financial planning service when a Forester Life Financial Adviser visits you at your home and records the information you share during an assessment of your financial needs;
- when you apply for a Forester Life Plan online;
- when you make a gift payment into a Forester Life child’s savings either via our financial planning service, online, by telephone or by post;
- when you complete a claim form or make an enquiry on our website

- via feedback and opinions you provide us
- when you fill out a survey, or vote in a poll on our website
- through quotes and application forms
- via cookies. You can find out more about this in our cookies policy
- via our telephone calls with you, which may be recorded
- via enquiries you make online when visiting our website

We also collect your personal information from a number of different sources including:

- directly from an individual who has a Plan with us and with whom you are connected in some way, for example as a relative or a payer;
- from credit reference agencies who are used to verify your identity and will source your details from databases such as the electoral register;
- from Social Media; and
- via third parties including:
 - representatives that are authorised to act on your behalf such as Power of Attorneys; medical professionals;
 - third parties such as companies who provide consumer classification for marketing purposes e.g. market segmentation data.

6. What personal information do we collect?

The information we collect depends on the Plan you apply for; for example if you are interested in finding out more or purchasing an investment or protection product, this will then determine the kind of information that will be required to confirm your eligibility for the product and successfully enrol you as a Foresters customer. If you apply for a Protection Plan (which may include life cover, critical illness cover and income protection cover) we collect information about your physical and mental health. We may also collect information about your physical and mental health if you make a claim against a protection Plan.

Where other individuals are associated with your Plan such as a life assured or a payer, we may ask you to provide the information below in relation to those people too, if this is relevant to your Plan.

We may collect the following information about you.

Personal information

- contact details such as name, email address, postal address and telephone number;
- details of any other persons included on the Plan where they are named on your Plan and the relationship to you as Planholder;
- identification information such as your date of birth, national insurance number, passport and driving licence;
- financial information such as bank details;
- information relevant to your Plan such as previous policies or claims, recent contact with us;
- information relevant to any claim or your involvement in the matter giving rise to a claim;
- information obtained through our use of cookies. Further information related to this can be found in our cookies policy;
- source of funds for investment (for large transactions);
- tax residency (for large transactions); and
- your marketing preferences, in particular your choice to 'opt-out' of receiving electronic marketing communications.

Sensitive personal information

- details of your current or former physical or mental health.

7. How do we use your Personal Information

We use your personal information to provide you with a Forester Life Plan or benefits and to provide you with the right services based on your situation. This will ensure we can quickly contact you with updates containing critical information in relation to any claim or administrative request you may have raised with us, whilst ensuring that we also keep your information secure from fraudulent activity. In addition, there are a number of other reasons why we use your personal information. Please see below for a more detailed list of how we use your personal information.

We may process your personal information for a number of different purposes and these are set out in more detail in the below sub-sections. Under the EU-GDPR regulations, we need a reason to use and process your personal information and this is called a lawful ground. We have set out below the main reasons why we process your personal information and the applicable circumstances when we will do so. When the personal information we process about you is classed as sensitive personal information (Special Categories of data) we must have an additional legal ground for such processing, or where appropriate, we apply a specific exemption for insurance purposes.

- Processing is necessary in order for us to provide your Plan and services, such as assessing your application and setting you up as a Planholder, administering and managing your Plan, providing all related services, providing a quote, handling and paying claims and encashments and communicating with you. In these circumstances, if you do not provide such information, we may be unable to offer you a Plan or process any claim.

- Where we have a legal or regulatory obligation to use such personal information, for example, when our regulators, the Prudential Regulatory Authority, (PRA), the Financial Conduct Authority (FCA) and our data protection regulator, the Information Commissioner's Office (ICO) wish us to maintain certain records of any dealings with you.
- Where we need to use your personal information to establish, exercise or defend our legal rights, for example when we are faced with any legal claim or where we want to pursue any legal claim ourselves.
- Where we need to use your personal information for reasons of substantial public interest, such as investigating fraudulent claims and carrying out fraud, anti-money laundering and anti-terrorist financing checks.
- Where we have a specific legal exemption to process sensitive personal data for insurance purposes. This exemption applies where we need to process your information as an essential part of the insurance cover, for example health data.
- Where you have provided your consent to our use of your personal information. We will usually only ask for your consent in relation to processing your sensitive personal information (such as health data). This will be made clear when you provide your personal information. If we ask for your consent we will explain why it is necessary. Without your consent in some circumstances, we may not be able to provide you with services under your Plan or handle claims or you may not be able to benefit from some of our services. Where you provide sensitive personal information about a third party, we will ask you to confirm that the third party has provided his or her consent for you to act of their behalf.
- Where we have appropriate legitimate business need to use your personal information such as maintaining our business records, developing and improving our products and services, all whilst ensuring that such business need does not interfere with your rights and freedoms and does not cause you any harm.
- Where we need to use your sensitive personal information such as health data because it is necessary for your vital interests, this being a life or death matter.

The lawful grounds on which we may rely with respect to the use of your personal information are below:

Purpose for Data Processing	Personal Information Processed	Lawful Ground for Processing
To review and process your application, including where we provide you with a quote.	Your contact details, your age and the personal details of other person(s) related to your Plan. Sensitive personal information regarding your health and medical history.	Lawful Grounds: This processing is necessary in order to provide your insurance Plan and is deemed to be in both the legitimate interest of Forester Life and you as the customer. Lawful Grounds for sensitive personal information: Where appropriate, through application of an exemption for insurance purposes or you have provided your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to play claims.
To set up, administer, provide and service your Plan, assess eligibility for and handling and paying claims.	Your contact details, your age and the personal details of other person(s) related to your Plan (guardian, payer, Registered Contact).	Lawful grounds: such use is necessary in order to provide your Plan and we have a legitimate business need to use your personal information to administer your Plan and handle any claims. Lawful Grounds for sensitive personal information: Where appropriate, through application of an exemption for insurance purposes or you have provided your consent. Please note that, in some cases, if you do not provide your consent, we may not be able to play claims.
To communicate with you and resolve any complaints you may have.	Your contact details and any information relevant to your Plan.	Lawful grounds: such use is necessary in order to provide your Plan and we have a legitimate business need to resolve any complaints. Lawful grounds for sensitive personal information: such use is necessary for the purposes of establishing, exercising or defending our legal rights, where you have provided your consent or where appropriate we have applied an exemption for insurance purposes.
To process your application to invest contributions or pay premiums for your Plan by regular amounts e.g. monthly.	Your contact details and bank account details.	Lawful ground: such use is necessary in order to provide your investment or savings Plan and is deemed to be in both the legitimate interest of Foresters and you as the customer.

For compliance monitoring and crime prevention.	Your contact details, your age and the personal details of other person(s) related to your Plan. Information available in the public domain or on social media.	Lawful grounds: such use is necessary in order to provide your Plan and is deemed to be in both the legitimate interest of Forester Life and you as the customer, in order to prevent financial crime. Lawful ground for sensitive personal information: we need to use your personal information for reasons of substantial public interest to prevent and detect financial crime.
For our own management information purposes including; managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (e.g. tax or legal advice). We also undertake measures to secure our system and to ensure the effective operation of our systems.	Your contact details, your age and the personal details of other person(s) related to your Plan.	Lawful grounds: we have a legitimate business need to use your personal information to understand our business and monitor performance in order to maintain appropriate records, so we can protect the security of our customer systems. Lawful ground for sensitive personal information: Where appropriate, through application of an exemption for insurance purposes.
For analytical and research purposes and to improve our products and services.	Your contact details, your age and the personal details of other person(s) related to your Plan.	Lawful ground: we have a legitimate business need to use your personal information for services improvement. Lawful ground for sensitive personal information: Where appropriate, through application of an exemption for insurance purposes (under the UK Data Protection Bill).
Complying with our legal or regulatory obligations.	Details about you, other related parties and your Plan.	Legal ground: such use is necessary for us to comply with our legal and regulatory obligations.
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers); technology may include voice analytics.	Details about you and other related parties, your Plan having been discussed with you or your authorised representative during a telephone conversation with us.	Lawful ground: such use is necessary in order to improve the quality of the service related to your investment or savings Plan and is deemed to be in both the legitimate interest of Forester Life and you as the customer. Lawful ground for sensitive personal information: Where appropriate, through application of an exemption for insurance purposes.
Providing marketing information to you (including information about other products) in accordance with preferences you have expressed.	Your name, contact details, marketing preference to receive communication.	Lawful ground: you have provided your acceptance to receive electronic marketing communications.
To communicate to you about your membership with Foresters Financial.	Your contact details and any information relevant to your membership.	Lawful ground: such use is necessary in order to provide your membership benefits and legitimate business interests so we can inform you of membership and community events.

8. Who may we disclose your personal information with?

We might share your personal information with two types of organisation – Foresters Financial, and other third parties outside the group. For further details of disclosures, please see below. We do not share any of your personal information other than for the purposes described in this Privacy Policy. If we share anything outside the group, it'll be kept strictly confidential and will only be used for reasons that we've described.

We may also attempt to electronically verify your identity by providing your information to a credit reference agency that will compare your information with other databases to ascertain its authenticity.

We will not disclose any of your information to any other body or organisation except to prevent crime or if required by law or any law enforcement organisation.

Disclosures within Foresters Financial

In order to provide our services your personal information is shared with other companies within the Foresters Group. Your personal information might be shared for our general business administration, efficiency and accuracy purposes. Forester Life Planholders are members of Foresters Financial. Your personal details will be sent to the international headquarters of Foresters Financial the address of which is 789 Don Mills Road, Toronto, Canada M3C 1T9, where Membership is managed. This information does not include your financial or Plan details. The Data Privacy regulation of Canada is the equivalent to that of the UK.

Disclosures to third parties

To complete our processes we may have to share your information with our service providers. These organisations will not use your information for any other purpose. If they are processing sensitive information such as medical details, then as Data Controllers themselves they are required to ensure such information is secured and only available to authorised persons.

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your authorised representatives (on your behalf where you are incapacitated or unable)
- Your medical social and welfare advisers, or practitioners
- Our insurance partners such as other insurers and reinsurers
- Our third-party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers
- Central and local Government Agencies (for example if they are investigating fraud or because we need to contact them regarding international sanctions)
- The Financial Ombudsman Service and regulatory authorities such as the Financial Conduct Authority and the Information Commissioner's Office
- Other insurance companies, law enforcement agencies and organisations that maintain anti-fraud or other crime databases where reasonably necessary for the prevention or detection of crime

Disclosure of your personal information to a third party outside of the Forester Life will only be made where the third party has agreed to keep your information securely and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- we are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Prudential Regulatory Authority, Financial Conduct Authority or Information Commissioners Office request; or
- we believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including financial crime) or is otherwise in the overriding public interest.

Some of the recipients set out above may be in countries outside of the EEA notably in (i) Canada, where the Foresters Financial headquarters is located. Where we make a transfer of your personal information outside of the EEA for the purposes described in this Privacy Policy we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards.

9. How long do we keep Records for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations. The time period we retain your personal information for will differ depending on the nature of the personal information and what we do with it. How long we keep personal information is primarily determined by our regulatory obligations. We typically keep quote information for three years, and Plan and claims records for up to twenty years from the end of our relationship with you based on regulation and our Retention Policy.

10. Marketing

You are in control of how we use your information for marketing. We may use your information to tell you about products and services that could interest you.

Foresters are committed to providing you with an excellent customer service. Foresters Financial will keep you informed, from time to time about benefits to you and your family from your membership of Foresters, and Forester Life may keep you informed from time to time about relevant products and services that may help meet your financial needs. We may do this by post, email, or phone.

We will never disclose any your details to anyone outside of Foresters Financial for marketing purposes. If you wish to unsubscribe from emails sent by us you can always contact us to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

In order to help us get to know you and identify what products and services may interest you we obtain information about you from other sources inside and outside the Foresters Financial for example, companies who provide consumer classification and market segmentation data for marketing purposes. Examples of these organisations are Experian or LexisNexis.

From time to time we may run specific marketing campaigns through social media and digital advertising that you may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. If you do not want to see any campaigns then you will need to adjust your preferences within your social media settings and your cookie browser settings.

11. Your rights and your information

You have the following rights in relation to our use of your personal information:

- The right to access your personal information;
You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests. Your personal information will usually be provided to you in writing, unless otherwise requested, or where you have made the request by electronic means, in which case the information will be provided to you by electronic means where possible.
- The right to rectification;
We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact us and you can ask us to update or amend it.
- To request that if there is a dispute in respect to the accuracy or processing of your information, a restriction is placed on any further processing by us;
In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.
- The right to erasure where it is no longer necessary;
In certain circumstances, you have the right to ask us to erase your personal information, for example where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors, for example according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.
- To request that we transfer your information to another data controller;
In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.
- The right to object to the processing of your personal information;
For certain uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information. Please note in some cases we may not be able to process your insurance if you withdraw your consent.
- The right to object to direct marketing;
You can ask us to stop sending you marketing messages at any time by contacting us.

The right not to be subject to automated-decision making: We not currently operate any automated decision making systems, but may do so in the future.

- The right to complain;
If we have been unable to satisfy your concerns regarding any aspect of the processing or handling of the information you can contact the Information Commissioners Office (ICO) on:
 - Telephone helpline: 0303 123 1113 (local rate)
 - Email: visit www.ico.org.uk/global/contact-us/email/
 - Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

You can make any of the requests set out above. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

In some circumstances exercising some of these rights will mean we are unable to continue providing our services and may therefore result in the cancellation of your Plan. You will therefore lose the right to bring any claim or receive any benefit under your Plan, including in relation to any event that occurred before you exercised your right, if our ability to handle any claim has been prejudiced. Your Plan terms and conditions set out what will happen in the event your Plan is cancelled.

12. Telephone Communications

We may monitor telephone calls and retain recordings of them. Before discussing any Plan details or exchanging any personal information we will check your identity to ensure we are speaking to the correct person. We record telephone calls for the following reasons:

- For quality control and training;
- To prevent unauthorised use of our telecommunications system; and
- To meet our legal obligations.

13. Changes to this Privacy Policy

We reserve the right to amend or modify this policy at any time and in response to any changes in applicable data protection and privacy regulation.

If we change this policy, we will post those changes and may place notices on our website.

14. Contact Details for Data Protection Officer

If you wish to contact our Data Protection Officer the details are below:

The Data Protection Officer
Foresters Financial
Foresters House
2 Cromwell Avenue
Bromley
BR2 9BF

Email address: data.protection@foresters.co.uk

15. Forester Life's Data Privacy declaration

Your personal information helps us give you a better, more personalised service. But looking after that data is a big responsibility. We take our responsibilities seriously, so we keep your data safe, confidential and will never sell it. And, if you ask us to, we'll tell you exactly what information we have so you can be sure it's up-to-date and accurate.

Our mission is to help you with your savings and investments, personal insurance, and pension planning. Doing so involves the collection of data so that we may provide you with the right products and services to meet your needs.

This is why we considered it important to share with you the principles that will guide us with regard to the treatment of personal information.

Our Commitment to Safeguard Personal information

We know that respecting the confidentiality of personal information is critical to preserving your trust and therefore have developed various security procedures. We use a range of organisational and technical security measures designed to protect your personal information from unauthorised use or disclosure.

Our Commitment in Respect to the Use of Personal information

We collect your personal information and use it in compliance with data protection regulations.

We have in place procedures and contractual arrangements designed to ensure that all employees and service providers keep customer files confidential.

Our customers may entrust us with sensitive personal information in connection with insurance coverage we provide to them – both at the time of their initial application and during the term of their coverage. We view ourselves as custodians of this data and do not sell it to third parties outside Foresters Financial.

These are our continuing commitments to you. We will keep pace with future developments surrounding data privacy to adapt them to your evolving needs.

For more information, please feel free to contact the Data Protection Officer.