

## **General Data Regulations (GDPR) - 25th May 2018**

*This leaflet covers GDPR and demonstrates how David C. Nunn Independent Family Funeral Director is dealing with the new legislation and understanding your personal data preferences. You will be shown a series of questions for you to answer. Your consent must be freely given, specific, informed and unambiguous. Please ask if you are unsure of anything, as it is very important to us to understand your preferences regarding your personal data and retention of personal data.*

## **Privacy Policy 2022**

### **How we obtain your personal data**

#### **Information provided by you**

You provide us with personal data either on your funeral arrangement forms, pre-paid funeral plan documents, headstone application forms, and floral tribute orders, in person, via-online services or over the telephone. This includes your name, address, email, occupation, telephone number, your funeral wishes and relationship to the deceased, details of headstone application instructions and your preferred payment details. We use this information to manage and administer the funeral arrangement, pre-paid funeral plans, headstone works applications and floral tribute orders. We may also keep information contained in any correspondence you may have with us by post or by email. We may obtain sensitive information from you, your family or other contact. The provision of this personal data is essential for us in carrying out your instructions. This means that the legal basis of our holding your personal data is for the performance of a contract. You may provide us with information about your relatives, friends & contacts. You must have their permission to pass us their data details.

#### **Information we get from other sources.**

We only obtain information from third parties if this is permitted by law. This information is relevant to us, we will only be obtained from reputable third-party companies and council's that operate in accordance with GDPR.

#### **How we use your personal data**

We use your personal data to manage and administer your funeral wishes, pre-paid funeral plan, headstone applications and floral tribute orders. We may also act as controller and processor in certain instances. We undertake at all times to protect your personal data in a manner which is consistent with your funeral director's duty of professional confidence and the requirements of GDPR. We will also take reasonable security measures to protect your personal data in storage.

#### **Do we use your personal data for marketing purposes?**

Any information that you chose to give us will not be used for marketing purposes by us. We will hold your personal data only for the purposes of administering and managing your contact with us. Ecclesiastical Planning Services have their own specific marketing policy, which you will agree to during any plan application processing.

## **Information about cookies**

A cookie is a small text file stored on your browser. We do not use any information retained for marketing purposes.

## **Sharing information**

We will keep information about you confidential and we will from time to time share your personal data for the purpose of audit, compliance, administration and management of your contract with us. We will only disclose your information with other third parties with your express consent with the exception of the following:-

## **Categories of third parties**

- Insurance companies, loss assessors, regulatory authorities and other fraud prevention agencies.
- Any mailing or printing agents, contractors and advisors that provide a service to us or act as our agent on the understanding that they keep the information confidential.
- Anyone to whom we may transfer our rights and duties under any agreement we have with you.
- Any legal or crime prevention agencies and / or to satisfy any regulatory request if we have a duty to do so if the law allows us to do so.

## **Transfer of your personal data outside of the European Economic Area (EEA)**

We do not currently need transfer your personal data outside the EEA.

## **How long do we keep this information about you?**

We keep information in line with the retention policy. These retention periods are in line with the length of time we need to keep your personal information in order to manage and administer your contract with us. Your consent choice is also very important to us and will always be considered. We also consider our need to meet any legal, statutory and regulatory obligations. These reasons may vary from one piece of information to another. You will be given a free choice of how long we hold some of this information to also meet your expectations of us as a community funeral director.

## **Data subject rights**

### **Subject access requests**

The GDPR grants you the right to particular data we hold about you. This is referred to as a subject access request. We shall respond promptly, and certainly within one month from the point of receiving the request and all necessary information from you. Our formal response shall include details of the personal data we hold, including the following:-

- Sources from which we acquired the information
- The purpose for processing the information; and
- Persons or entities with whom we are sharing the information

### **Right to rectification**

You have the right to obtain from us the rectification of inaccurate personal data we hold concerning you, including incomplete data completed.

### **Right to erasure**

You shall have the right to obtain from us erasure of personal data concerning you without undue delay.

### **Right to restriction of processing**

Subject to exemptions, you shall have the right to obtain from us restriction of processing where one of the following applies:-

- The accuracy of the personal data is contested by you and is restricted until the accuracy is verified.
- The processing is unlawful and you oppose the erasure of personal data and instead request the restriction of its use.
- We no longer need the personal data, but it is required by you, for the establishment, exercise or defence of legal claims.
- You have objected to processing of your personal data pending the verification of whether there are legitimate grounds for us to override these objections.

### **Notification obligation regarding rectification or erasure of personal data or restriction of processing**

We shall communicate any rectification or erasure of personal data or restriction of processing as detailed above to each recipient to whom the personal data has been disclosed unless this proves impossible or involves disproportionate effort. We shall provide you details of those recipients if you request it.

### **Right to data portability**

You, the data subject, shall have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit this data to another controller, without hindrance from us.

### **Right to object**

You shall have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you, including any personal profiling; unless this relates to processing that is necessary for the performance of a task carried out in the public interest or an exercise of official authority vested in us. We shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing, which overrides the interest, rights and freedoms of you, for the establishment, exercise or defence of legal claims.

### **Right to not be subject to decisions based solely on automated processing**

We do not carry out automated processing. Invoking your right If you would like to invoke any of the above data subject rights with us, please write to David Nunn, David C. Nunn Independent Family Funeral Director, 11-13 Old Main Street, Bingley BD16 2RH

### **Accuracy of information**

In order to provide the highest level of customer service possible we need to keep accurate personal data about you. We take reasonable steps to ensure the accuracy of any personal data or sensitive information we obtain. We ensure that the source of any personal data or sensitive information is clear and we carefully consider any challenges to the accuracy of the information. We also consider when it is necessary to update the information and you can help us by informing us of when these changes occur.

### **Important information**

Questions and queries If you have any questions or queries which are not answered by the Private Policy or have any potential concerns about how we hold data please write to David Nunn, David C. Nunn Independent Family Funeral Director, 11-13 Old Main Street, Bingley BD16 2RH.

### **Policy changes**

This Privacy Policy is reviewed regularly. We reserve the right to make changes and amend this Policy from time to time. However, we will not significantly change how we use information you have already given us without your prior agreement.

### **If you have a complaint**

If you have a complaint regarding the use of your personal data or sensitive information then please contact us in writing to David Nunn, David C. Nunn Independent Family Funeral Director, 11-13 Old Main Street, Bingley BD16 2RH.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to Information Commissioner's Office. You have a right to appoint a third party to lodge the complaint on your behalf and exercise your right to seek compensation.