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Southall Funeral SERVICES | 70 Western rd, SOUTHAll, UB2 5DZ

Privacy Statement

This Privacy Statement explains why we collect personal data, what personal data we collect

and how we use it. Your rights in respect of your data are also explained.

You entrust Southall Funeral Services with your important personal information and we take our responsibilities

seriously. We are committed to protecting and respecting your personal data.

*Michael Tiney, May 2018.*

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# **What is the purpose of this Privacy Statement?**

This Privacy Statement explains how Southall Funeral Services looks after your personal data when we provide our services and products, in accordance with applicable legislation intended to protect your personal data and privacy, including the General Data Protection Regulation and related rules. We also explain what your rights are.

By providing your personal data you acknowledge that we will only use it in accordance with this

Privacy Statement.

Where we refer to “Southall Funeral Services” or “we”, we mean the Southall Funeral Services at 70 Western Rd, Southall, UB2 5DZ

This statement applies where Southall Funeral Services acts as data controller, where we are responsible for deciding how we hold and use your personal data. Where we ask others to process your data, we ensure that they adhere to the Data Processor’s obligations under GDPR.

It is important that you read this statement together with any other privacy notice we may provide on specific occasions, so you are aware of how and why we are using your personal data.

# How will we use your personal data?

The data protection laws (General Data Protection Regulations, or GDPR) require that the personal data we hold about you must be:

* Used lawfully, fairly and in a transparent way;
* Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes;
* Relevant to the purposes we have told you about and limited only to those purposes;
* Accurate and kept up to date;
* Kept secure and confidential;
* Kept only as long as necessary for the purposes we have told you about.

You should be aware that the information about the deceased is not covered by GDPR, but of course we handle that data with the same sensitivity and care that we take with personal data.

What we use your data for is described below in Section 6.

# How do we ensure the security of your personal data?

We have put in place appropriate security measures to prevent your personal data from being

accidentally lost, altered, disclosed, used or accessed in an unauthorised way.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to access your data. They will only process your personal data on our instructions and are subject to a duty of confidentiality and compliance with GDPR.

We have put in place procedures to deal with any suspected data security breach and will notify

you and any applicable regulator of a suspected breach where we are legally required to do so.

 As part of our data security measures we ensure that we train our employees regularly and have

appropriate data protection policies in place to support our compliance.

# What kind of personal data may we hold about you?

Personal data means any information about a live individual from which that person can be identified. In order to provide our products and services, we may collect the following types of personal data about you. In this instance “**you**” refers to the applicant, ie **the person responsible for the funeral**:

* contact details such as name, address, telephone number(s), email address(es);
* required information such as: relationship to the deceased,
* other background information such as requests that you would like us to take into account such as coffin type, place of service, transportation, funeral arrangements.

In addition, we will also gather information on the deceased as we are required to do by law.

# How may we collect your personal data?

We may collect personal data from you in a number of ways, depending on how you contact us. It may include:

Information you give us: You may choose to provide us with your personal data:

* by submitting a request via the “Contact Us” facility on our website for us to contact you;
* corresponding with us by telephone, email, letter or other means;
* in discussion with one of our authorised representatives or advisers; or
* by participating in feedback or surveys or by providing contact details offline.

Information we collect about you:

* If you contact us via our website we may automatically collect technical information such as your internet protocol (IP) address if you use our website. (We will not obtain or store personally identifiable information about you from our cookies, please see our Cookie Policy on our website for more information.)

Information we receive from other sources:

* Recommendations from a religious community
* Funeral Directors arranging repatriation from abroad

Please note telephone calls may be recorded in order to monitor the quality of customer service, for training purposes or where we are legally required to do so.

# What will we use your personal data for?

We will only use your personal data when the law allows us to do so.

Most commonly we use your personal data to provide our product or service to you. We set

out the main reasons why we process your personal data and the applicable circumstances below:

* provide a proposal or provide advice;
* to perform the contract we have entered into with you, and to provide other related services similar to that which you have contracted with Southall Funeral Services;
* to communicate with you;
* to inform relevant authorities as we are required to do by law.
* to respond to complaints and data subject requests (see section 12 below); and
* where it is necessary for our legitimate interests (or those of a third party) provided your interests and fundamental rights do not override those interests, for example:
	+ to establish, exercise or defend our legal rights, where we are faced with any legal claims or where we want to pursue legal claims ourselves;
	+ to prevent fraud.
* to respond to and manage ad hoc enquiries and complaints;
* to provide management information to enable us to monitor our performance and understand our business, to maintain our business records, to manage our financial position and business capability, to receive professional advice, to improve our products and services and for training purposes;
* for accounting, auditing purposes and corporate governance purposes;
* to assist with debt recovery;

# How will we use sensitive personal data?

We do not process or hold special or sensitive personal data. We are used as a delivery service for certain documentation, as required by law, but we do not copy, process or use the data on it.

(For example Forms 4, 5 and 6 that are filled in by the doctor/coroner and required by the Crematorium.)

# Who might we share your personal data with?

We may have to share your data with third parties, including third-party service providers (such as our outsourcing partners, contractors and designated agents) with whom we deal as part of the operation of our services. We will always mandate those third parties to respect the security of your data and to treat it in accordance with the law and only for the purpose for which we obtained it. In addition they must have a Privacy Statement that shows that their workings comply with GDPR.

# Why might we share your personal data?

We may share your personal data with third parties where required by law, and where it is necessary to provide our services and in order to administer your wishes, or where we have another legitimate interest in doing so, in each case for the purposes described in this Privacy Statement. Examples of this are: The Crematoruim/Cemetary, the Clergy officiating at the service, Charities, The White Dove company, those associated with the scattering of ashes.

**We will not sell your details to any third party**. **We will not use your personal data for marketing**

**purposes without your explicit written consent.** We do not use automated decision-making or

profiling.

# How secure is your information with third parties?

We will only share your personal data with verified “data processors” for the purposes specified in this Privacy Statement and on the basis that it will be kept confidential and secure, and will only be used for the reasons described.

# Transferring information outside the European Economic Area (“EEA”)

Southall Funeral Services does not typically transfer personal data, but the data it has is held within “The Cloud” . Where this happens we have sought assurances that the date is not stored outside the EEA.

# How long will we use your information for?

We will keep your personal data for as long as you are a customer of Southall Funeral Services, which includes the length of time that we store the ashes of the deceased. Thereafter we may keep your data for up to three generations as it is common practice for a number of applicants to request similar services to that of their parents.

We also keep records so that we can respond to any questions or complaints and to maintain records where we are required to do so. We may keep your data for longer than 7 years if we cannot delete it for legal, regulatory or technical reasons, for example in relation to a contract or provision of a warranted product.

To determine the appropriate retention period we consider the type of contract you have with

Southall Funeral Services, the quantity, 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, whether we can achieve those purposes through other means and any applicable legal requirements to retain such personal data for prescribed periods. Where we retain your data we will make sure your privacy is protected and only use it for the purposes described above.

# Your rights in connection with personal data

You can ask us to do certain things with your personal data such as provide a copy of it, correct it

or even delete it. There may be occasions where we cannot comply with a request and we will tell

you if this is the case and give our reasons. This will usually be for legal or regulatory reasons and you must be able to prove to us that you are the data subject that you are enquiring about.

Under most circumstances you have the right to:

* **Request access** to your personal data (“data subject access request”). This enables you to confirm whether we process your personal data and to receive a copy of the personal data we are have and certain information about how we use your personal data.
* **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request** the **erasure** of your personal data. You can ask us to delete or remove personal data where the processing is no longer necessary for the original purpose, or where you withdrew your consent, or the processing is unlawful or your personal data must be erased to comply with the law. However in some cases, if we have another legal basis or legitimate interest for processing your personal data, we may not be able to comply. We will tell you if this is the case.
* **Request** the **restriction** of processing of your personal data.
* **Object** **to the processing** of your personal data. You have the right to object to us processing your personal data where we are doing so:
	+ based on our legitimate interest (for the purposes described in this Privacy
	+ Statement) unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and
	+ for direct marketing purposes.

Please note that by exercising this right it is possible that Southall Funeral Services will no longer be able to continue to provide its products or services or administer its contract with you

* **Request the transfer** of your personal data to another party. In certain circumstances you can ask us to send your personal data to a third party of your choice. For example where it is information which is processed by us by automated means and you have consented to such processing or we need to process the information to perform our contract with you.
* Right to **withdraw consent**. If you have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This would not affect the validity of the processing prior to such date. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Please note that by exercising this right it is possible that Southall Funeral Services will no longer be able to continue to provide its products or services or administer its contract with you.

# How do you exercise your rights?

You can make a request by contacting Southall Funeral Services via a number of ways set out below. However, we will always ask you to confirm your request in writing, and we will need you to prove that you are the person making the data subject request.

You will not usually have to pay a fee to exercise any of your rights. However, we may charge a

reasonable administration fee, or not comply with a request, if a request is clearly unfounded,

excessive or repetitive so as to be deemed vexatious. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

# What if you have queries about this Privacy Statement or the way Southall Funeral Services uses your personal data?

If you wish to exercise any of your rights, or you have any questions about this Privacy Statement, how we handle your personal data or if you wish to make a complaint, please contact us as follows:

By letter to
Data Protection Enquiries,

Southall Funeral Services,

70 Western Rd,

Southall,

UB2 5DZ

or by email at info@southallfuneralservices.co.uk

or call us on 020 8571 0621 during office hours:

Monday to Friday from 9am to 5pm (excluding Bank Holidays).

# Right to complain

You also have the right to make a complaint at any time to the ICO, the UK supervisory authority

for data protection issues. You can contact the Information Commissioner’s Office at:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

or telephone

0303 123 1113

[www.ico.org.uk](http://www.ico.org.uk)

# Changes to this privacy statement

We reserve the right to update this Privacy Statement at any time, and we will notify you if we

make any substantial updates. We may also notify you in other ways from time to time about the

processing of your personal data. You should check our website at [www.southallfuneralservices.co.uk](http://www.southallfuneralservices.co.uk) periodically to view the most up to date Privacy Statement.