

Customer Privacy Notice

The Hunnaball Family Funeral Group Limited

What is the purpose of this document?

The Hunnaball Family Funeral Group Limited ("**Company**") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

The Company is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services that we have entered into with you. We may update this notice at any time.

It is important that you read this notice so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data, which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as your full name, postal address, telephone number, e-mail address, mobile telephone number and family details
- Demographic information such as preferences and interests.
- Your credit or debit card details where you make a payment. We process these only for the purpose of providing these to our secure third party payment providers (see below for details) and do not retain them after the payment is processed.

We will automatically collect the following categories of personal information about you when you use our website:-

- Your IP address (automatically collected)
- Your web browser type and version (automatically collected)
- Your operating system (automatically collected)
- A list of URLs starting with a referring site, your activity on this Website, and the website you exit to (automatically collected)
- Your Cookie information (see our Cookie Statement: <http://www.hunnaball.co.uk/privacy-policy/> for details)

The more sensitive “special categories” of data includes data such as information about race, ethnicity, religious belief, sexual orientation, political opinions, health, genetic or biometric information and information about criminal offences or convictions. Processing of this data is prohibited unless one of the additional grounds in Article 9 of the GDPR apply.

We will collect, store, and use information in respect of your religious beliefs, which is a "special category" of personal information about you. The purpose of collecting this information about you is to organise the correct service for the funeral. The grounds for processing this personal data under Article 9 of GDPR will be that you have given your explicit consent to this.

How is your personal information collected?

We collect personal information about you when you complete our Funeral Arrangement Form (online or in person) and when you access and use our website.

We have CCTV installed in our premises in public areas and particularly around entrances and exits; this is for the purposes of prevention and detection of crime and employee monitoring.

How we will use your personal information, and the legal basis for this

We need all the categories of information in the list above (see paragraph headed “The kind of information we hold about you”) primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The specific situations in which we will process your personal information are listed below:

- We will use your name, postal address, email address, telephone contact details, payment details and family details for the purpose of entering into and performing our contract with you. The basis for this processing will be that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.
- We will use your name, postal address, email address, telephone contact details and family details to allow us to answer queries you have raised in relation to our services. The basis for this processing is that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such a contract.
- We may use your name, postal address, email address, telephone contact details, demographic information and personal information about you which is automatically collected when you use our website (as set out above) to provide you with marketing information in relation to services supplied by us which we believe may be of interest to you. The basis for this processing will be that the processing is necessary for our legitimate interest in keeping in touch with you to make sure that you are aware of the full range of services we offer.
- We will use name, postal address, email address, telephone contact details, family details and payment details to maintain our own administrative and accounting records and to fulfil related legal obligations to which we may be subject. The basis for this processing will be that it is necessary for the performance of our contract with you.
- We may use information concerning your religious beliefs for the purpose of performing our contract with you, specifically fulfilling your funeral service requests. The basis for this processing will be that you have given consent to it, and the processing will only take place whilst such consent has been given and has not been withdrawn.
- We will retain some of your information and information in relation to funeral arrangements for the purpose of being able to refer to this in the event that you wish us to arrange funerals for other family members etc. in the future as we have found that this is a service which is often required by our clients. The grounds for this processing will be that it is necessary for the purpose of our legitimate interest in being able to provide this information when required.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to enter into a contract with you or perform a contract we have entered into with you, or we may be prevented from complying with our legal obligations.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

At present we do NOT use Automated decision-making to process personal data.

Data sharing

We may need to share your personal information with third parties where required by law, where it is necessary as part of our working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents).

In particular we may share your data with third party processors who we engage to process your data on our behalf in order to allow us to provide our services to you, including:-

- Oak Technology Ltd (trading as Funeral Go) (for storage and sharing of data). Their privacy policy can be found at: <https://www.oaktechnology.co.uk/privacy-policy/>
- Debt collectors (for collecting unpaid fees).
- Doctors.
- Cemeteries.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party

service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the EU

We may transfer the personal information we collect about you to countries outside the EU in order to perform our contract with you. When we do so, we will determine whether there is an adequacy decision by the European Commission in respect of those countries or another lawful basis for the transfer under GDPR.

If, for any reason, we intend to transfer the personal information we collect about you to countries outside the EU for which there is no basis for transfer as above, we will write to you to advise you of the potential risks and to seek your explicit consent to the proposed transfer before it takes place.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties that need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

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.

Data retention

We will only retain your personal information 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. If, for any reason, you cease to be a customer of the Company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at the details below:-

- Name and role - Chris Partner – Compliance Manager
- E-mail - chrispartner@hunnaball.co.uk
- Address - The Gate House, Old Coach Road, Colchester, CO1 2TH / 01206 986239

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

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 information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the details listed above (see paragraph headed “Your rights in connection with personal information”). 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.

Compliance Manager

We have appointed a compliance manager to oversee compliance with this privacy notice or to answer any questions about how we process your personal information. Their details are listed above (see paragraph headed “Your rights in connection with personal information”).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.