

## **Supplier Privacy Notice**

**The Hunnaball Family Funeral Group Limited**

## **What is the purpose of this document?**

The Hunnaball Family Funeral Group Limited is committed to protecting the privacy and security of your personal information (and, where applicable, that of your employees). References to "you" in this document includes your employees where applicable.

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

The Hunnaball Family Funeral Group Limited is a "data controller" in respect of personal data which we collect from or about you. 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. If applicable, please ensure that a copy of this notice is passed to each of your employees with whom we are likely to be dealing during our working relationship and whose personal information we are therefore likely to collect and use.

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

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

## **Data protection principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.

5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **The kind of information we hold about you (or your employees)**

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 name, title, addresses, telephone numbers, and personal email addresses.
- Gender.
- Bank account details.
- Job title.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about race or ethnicity, religious beliefs, sexual orientation and political opinions.

### **How is personal information collected?**

We collect personal information about you when we make an initial contact with you regarding your services and we will continue to collect personal information throughout our working relationship.

### **How we will use information about you**

We will only use your personal information when the law allows us to. Most commonly, we will use this personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or those of your employees or someone else).
2. Where it is needed in the public interest.

### **Situations in which we will use personal information**

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 personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights (or those of your employees) do not override those interests. The situations in which we will process personal information are listed below:

- We will use some or all of the personal information provided by you for the purpose of entering into and performing our contract with you;
- We may use your name, address, email address and telephone contact details in the course of our legitimate interest in providing you with information as to our requirements for goods or services; and
- We will use your personal data to maintain our own administrative and accounting records and to fulfil related legal obligations to which we may be subject.

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 perform the contract we have entered into with you, or we may be prevented from complying with our legal obligations.

## **Change of purpose**

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Where applicable, this notification should then be passed to any relevant employees.

Please note that we may process personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent (or that of any relevant employees).
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest (for example, in order to prevent fraud).

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your and you are not capable of giving consent, or where the information public has already been made public.

## **Automated decision-making**

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

automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### **Data sharing**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of all personal information.

### **Why might you share my personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the 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).

## **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 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 such personal data for specified purposes and in accordance with our instructions.

## **What about other third parties?**

We may share 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 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. This means that the countries to which we transfer the data are deemed to provide an adequate level of protection for such personal information.

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 adequacy decision by the European Commission, we will write to you to advise you of the potential risks and to seek explicit consent to the proposed transfer.

## **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to 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. If applicable, please forward any such notification to all relevant employees in these circumstances.

## **Data retention**

### **How long will you use my information for?**

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 the personal data, the purposes for which we process the 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. If, for any reason, you cease to be a supplier 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 any such personal information changes during your working relationship with us.

## **Rights in connection with personal information**

Under certain circumstances, by law you (or where relevant any applicable employees) have the right to:

- **Request access** to 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 corrected.



- **Request erasure** of 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 personal information where you have exercised a right to object to processing (see below).
- **Object to processing** of 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 personal information for direct marketing purposes.
- **Request the restriction of processing** of personal information. This enables you to ask us to suspend the processing of personal information, 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 personal information, object to the processing of personal data, or request that we transfer a copy of personal information to another party, please contact our compliance manager, Chris Partner, whose contact details are as follows:

- 01206 986239
- [chrispartner@hunnaball.co.uk](mailto:chrispartner@hunnaball.co.uk)
- The Gate House, Old Coach Road, Colchester, CO1 2TH

### **No fee usually required**

You will not have to pay a fee to access personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if any 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 consent to the collection, processing and transfer of personal information for a specific purpose, you have the right to withdraw such consent for that specific processing at any time. To withdraw consent, please contact our compliance manager, Chris Partner, whose contact details are listed above (see paragraph headed "Rights in connection with personal information"). Once we have received notification that you have withdrawn consent, we will no longer process the information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

## **Compliance Manager**

We have appointed a compliance manager, Chris Partner, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle personal information, please contact the compliance manager using the contact details listed above (see paragraph headed "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. If we do so (and if applicable), please ensure that a copy of the new privacy notice is passed to each of your employees with whom we are likely to be dealing during our working relationship and whose personal information we are therefore likely to collect and use.

We may also notify you in other ways from time to time about the processing of your personal information. Again, if applicable, please ensure that all such notifications are forwarded to each of your employees with whom we are likely to be dealing during our working relationship and whose personal information we are therefore likely to collect and use.

**If you have any questions about this privacy notice, please contact our compliance manager.**