



## **PRIVACY NOTICE**

### **Your rights, your information and how we use it**

**Form version 25.05.2018 v1**

#### **Introduction**

Kevin Holland and Sons Ltd is committed to protecting your personal information. Our Privacy Policy contains important information about what personal details we collect; what we do with that information; who we may share it with and why; and your choices and rights when it comes to the personal information that you have given us.

#### **1. Scope**

All data subjects whose personal data is collected, in line with the requirements of the General Data Protection Regulation.

#### **2. Responsibilities**

- 2.1 Kevin Holland and Sons Ltd is responsible for ensuring that this notice is made available to data subjects prior to Kevin Holland and Sons Ltd collecting/processing their personal data.
- 2.2 All Employees of Kevin Holland and Sons Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

#### **3. Privacy notice**

##### **3.1 Who are we?**

We are Kevin Holland and Sons Ltd. Our trading name is Kevin Holland Funeral Service based in Bognor Regis.

We provide funeral services (and ancillary services relating to the carrying out of funerals). We operate from our trading address of Kevin Holland Funeral Service, 246 Chichester Road, Bognor Regis, West Sussex, PO21 5BA.

Our registered office address is 93 Aldwick Road, Bognor Regis, West Sussex, PO21 2NW. We are a company registered in England and Wales under company number 04414333. We are registered on the Information Commissioner's Office Register, registration number A8308286, and act as Data Processor when processing your data.

The company directors are the data controllers. We decide how your data is processed and for what purposes.

If you have any questions about our Privacy Policy or the information we collect or use about you, please contact:

The Company Directors  
Kevin Holland Funeral Service  
246 Chichester Road  
Bognor Regis  
West Sussex  
PO21 5BA

Telephone: 01243 868630

We process your personal data to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

***The personal data we would like to process on you is:***

- Name
- Home Address
- Any other relevant address you may choose to supply to us to correspond with you at
- Personal email or business email if you prefer
- Home Telephone Number
- Business Telephone Number should you choose to supply it for contact purposes
- Mobile Telephone Number
- Names of other family members
- Occasionally telephone numbers of other family members
- Information about your deceased whose funeral service we are carrying out e.g. their name, age, religion, doctor, occupation, next of kin etc
- Information classified as 'sensitive' personal information e.g. relating to the deceased's health, marital or civil partnership status. This information will only be collected and used where it's needed to provide the service you have requested or to comply with our legal obligations

***We collect information in the following ways:***

- Funeral arrangement interviews
- Follow up meetings
- Telephone calls
- Emails or letters sent to us
- An application form for a product or service

***How we use your personal data:***

Kevin Holland Funeral Service takes your privacy very seriously and will never disclose, share your data without your consent; unless required to do so by law, or in connection with the provision of our services. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. The provision of this personal data is essential for us in carrying out your instructions. Where you have

consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

The personal data we collect will be used for the following purposes:

- In the performance of a contract or to provide a service and to ensure that funeral services are provided in accordance with your wishes or those of the deceased.

Our legal basis for processing for the personal data:

- Taking steps at your request prior to entering into a contract with you
- fulfilment of a contract as instructed by you
- our legitimate interests in confirming our clients will be able to pay for our services
- our legitimate interests in ensuring client satisfaction and improving our services
- our legitimate interests in being able to provide a similar funeral to a previous one on request by the family

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To share your data from your original enquiry made to us either by phone, email, paper letter or in person, or a third-party source, with our colleagues in order to assist you with a funeral enquiry including the removal of the deceased.
- To store your data along with the deceased information on our Funeral Management system and by paper copy indefinitely in case of future historical reference to funeral details is required.
- To contact you by phone, email and paper communications to be able to make all the necessary funeral arrangements on your behalf.
- To visit you if you instruct us to your home address or mutually convenient place in order to make the funeral arrangements.
- To pass on your details to our third-party suppliers; including if applicable the crematorium or cemetery, minister or celebrant, doctors, florist, musician, venues, newspaper in the case of an obituary, online memorial site in the case of an online memorial being set up, vehicle hire company, freelancers, catering venues, etc.
- To contact you after the funeral has taken place to ask for feedback either in the form of an online review.
- To pass on your details to Golden Charter if you apply for a pre-paid Golden Charter Plan or make a pre-paid funeral plan enquiry.
- To pass on your details to our debt collection agency if the payment terms are not met.
- To contact you to make arrangements for return of the deceased's cremated remains to you or as instructed by you elsewhere.

The special categories of personal data concerned are:

- Religious Beliefs

***Storage of your data:***

Your data is stored both on hard paper copy and digitally within our Funeral Manager Software. The digital data is password protected. Paper copy archives are stored in a locked room, accessible only by company directors or with direct permission of company directors. Credit and debit card payment information is stored according to PCI Security Standards Council regulations.

### 3.2 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Kevin Holland and Sons Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us to update your preferences.

### 3.3 **Disclosure**

Kevin Holland and Sons Ltd will not pass on your personal data to third parties without first obtaining your consent. The following third parties may receive your personal data for the following purpose(s):

- A crematorium for the purpose of organising cremation of the deceased
- A cemetery for the purpose of organising burial of the deceased
- Doctor(s) if medical certification is required/applicable
- HM Coroner or HM Coroner's Officers if required in liaising regarding post mortem arrangements, release of deceased from the Coroner's care and the issue of any relevant cremation or burial certificates
- A nominated minister or celebrant for the purpose of arranging details of the funeral service
- A local musician for the purpose of liaising with you for your musical choices for the funeral service
- A florist(s) for the purpose of arranging the flowers for the funeral service
- A caterer for the purpose of arranging the details of the funeral reception
- A vehicle hire company or transportation agency
- A printer or designer if creating funeral stationery
- A monumental mason for the purposes of headstone/masonry work
- Any sub-contracted persons undertaking the transport of the deceased from place of death or place where the deceased is lying.
- Charitable donation recipients
- Any other company or third party you instruct us to liaise with on your behalf

We will never sell your details to anyone else. Whenever we share your personal information we will do so in line with our obligations to keep your information safe and secure.

### 3.4 **Where your information is processed**

All of your information is processed in the UK or EEA.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK / EEA data privacy laws e.g. we will put in place legal agreements with our third-party suppliers to ensure they meet these obligations.

### 3.5 **Retention period**

Kevin Holland and Sons Ltd will process personal data for as long as is necessary to allow us to fulfil your funeral service contract. We may also keep your information after this period where required to meet legal or regulatory obligations, or for reference purposes if/when you contact us to arrange another funeral, or in case of future requests to exhume the remains of a deceased person, including cremated remains.

### 3.6 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.

- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Kevin Holland and Sons Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.7 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

### 3.7 **Complaints**

We will always strive to collect, use and safeguard your personal information in line with data protection laws. In the event that you wish to make a complaint about how your personal data is being processed by Kevin Holland and Sons Ltd (or third parties described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority Kevin Holland and Sons Ltd

The details for each of these contacts are:

The Company Directors  
 Kevin Holland Funeral Service  
 246 Chichester Road  
 Bognor Regis  
 West Sussex  
 PO21 5BA

Telephone: 01243 868630

Information Commissioner's Office  
 Wycliffe House  
 Water Lane  
 Wilmslow  
 Cheshire  
 SK9 5AF

Telephone: 0303 123 1113  
 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
 Web: <https://ico.org.uk/>