

Cate Quinn Humanist Ceremonies – Data Privacy Notice

Created: 12/05/2018
To be reviewed: 11/05/2019

Introduction

My business involves conducting bespoke, non-religious, Humanist wedding and funeral ceremonies as requested by couples and mourners. On occasions, I also help organise Death Café's to enable interested parties discuss preparing for death, funerals and mortality in general in an informal environment.

In order to carry out these roles, I need to collect and process certain personal information relating to you, your family and your friends. Not everything you share is necessarily used in a ceremony.

I want you to know that the privacy and confidentiality of your personal information is of the utmost importance to me and to reassure you that I am compliant with the new General Data Protection Regulations (GDPR), which come in on 25th May 2018. These regulations are regulated by the Information Commissioner's Office: <https://ico.org.uk>

This being the case, I have reviewed the way I collect, use and store and process personal information. A summary of the data held, the purposes for which it is used and the period for which it is stored is provided at Appendix A.

Under the GDPR, anyone collecting and processing personal information must provide those supplying personal information with a Data Privacy Notice (this document), providing:

- The contact details for the person holding and using the information
- The nature of the information held
- The ways in which it shall be used
- The legal basis for using the information
- The legitimate interests for using the data
- Any third parties to whom the information shall be disclosed and why
- The rights to access and correct the data

You will be asked to give signed explicit consent for the me to process the information in the manner(s) described and to identify any restrictions or exclusions to those permissions (see Appendix B).

If you have any questions, please do not hesitate to contact me using the details overleaf.

Contact details

My Humanist Celebrant role is conducted as a sole trader business, carried out by Cate Quinn under the auspices of CQuinn Solutions. As such, I assume the roles of Data Controller, Data Processor and Data Protection Officer.

Contact details:

Cate Quinn
Tel: 07708 381303
Email: cate.quinn@humanistceremonies.org.uk
URL: www.Humanist.org.uk/catequinn/

Information Commissioner's Office registration reference: **ZA344328**

Purposes for which the data is held

The purposes for which the personal data are held and shared may include some or all of the following:

- Communicating with the couple/family and related third parties (e.g., wedding venues, funeral directors) regarding the development and delivery of the ceremony
- Delivering the ceremony
- Invoicing for work completed
- Quarterly levy returns to Humanists UK (anonymised counts) – a requirement of ongoing accreditation
- Promoting Humanist Ceremonies via the 'Cate Quinn Humanist Ceremonies' website or "Cate Quinn Humanist Ceremonies' business Facebook page
- The development and training of other Humanist Celebrants accredited with Humanists UK. In this case the data will be suitably anonymised to maintain confidentiality
- Ongoing personal professional development, e.g., peer review and accreditation purposes, in which case copies of ceremonies are shared with the peer reviewer
- Family access and research purposes by request (funeral tributes only)

Lawful basis for processing data

The Information Commissioner's Office has confirmed (12.3.18) that **Legitimate Use** is an acceptable basis for storing all data relating to individuals in order to conduct a ceremony, including data belonging to family or friends who are living and are not the customer.

The following additional lawful bases also apply as follows:

- You have given explicit consent (on or after engaging my services)
- You have entered into a contract with me to deliver services
- I am carrying out a public task
- I am legally required to collect certain information, e.g., finance records held for HMRC tax purposes
- Legitimate interests, e.g., to conduct a ceremony or host a Death Café

In the case of information which is provided to me which falls into the **'Special Category'** (*racial or ethnic origin, political opinions, membership of a trade union, sex life, religion or belief, physical or mental health condition*) you will need to indicate their consent to my use of this information for the conduct of a ceremony by ticking a box on the consent form (See Appendix B).

Principles

I agree to use your data lawfully, fairly and in a manner consistent with the principles of the GDPR, i.e., it will be

- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes)
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- handled in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Your rights

You have the following rights under the GDPR:

- To be informed
- Access to information held
- Rectification of errors
- Erasure of data held
- Restriction of processing
- Data portability
- Objections to use of data
- Not to be subject to automated decision-making
- To complain to a supervisory authority, in this case, the Information Commissioner's Office <https://ico.org.uk>

Consent

Your consent must be freely given and specific, and you have the right to change your mind at any time. It should be informed by an explanation of how your data will be used (as set out in this document).

You have been given access to my Data Privacy Notice (this document) and asked to sign a form, giving express consent to the sharing and use of your information as described herein (see Appendix B). You have the right to identify any exclusions or restrictions to the use and sharing of that data and to restrict the period of time for which information is held. This consent will be obtained at the point of engaging me to conduct work, or as soon as is practically possible, and be separate from any other terms and conditions. Consent can be withdrawn at any time.

Access to information

I will make available all data held on individuals on receipt of a valid request. Any information not expressly provided by the individuals will be withheld or redacted.

Requests will be responded to within 28 days and will be free of charge.

Requests that are manifestly unfounded or excessive may be refused. In which case, I will write to the individual stating why the request has been refused and their rights to complain to the supervisory authority and/or seek a judicial remedy.

Sharing data with third parties

I will only use your personal information to administer your account, to provide the services you have requested from me, to maintain my professional accreditation and to promote my work. In the course of these duties, the final ceremony, as agreed by you, will be shared verbally with:

- The guests attending the ceremony
- Any other staff involved in the ceremony, such as wedding planners, chapel attendants, funeral directors

A hard copy of the final agreed ceremony will be provided to you on completion of the ceremony.

An electronic copy of the final agreed ceremony will also be sent to you after the ceremony.

An anonymised copy of the ceremony may be shared with other accredited Humanists UK celebrants or celebrants in training with Humanists UK for personal development purposes. This will be with the express permission of the couple/chief mourners, as recorded on the consent form.

A brief synopsis of the ceremony and selected photographs (weddings only) may be shared via my website and/or business FaceBook page, with the express consent of the person(s) commissioning the ceremony.

Copies of funeral tributes may be shared with the Humanist Funeral Tribute Archive (<http://www.bishopsgate.org.uk/Library/Special-Collections-and-Archives/Freethought-and-Humanism/Humanist-Funeral-Tribute-Archive>), with your permission. This provides a rich resource for families and individuals conducting research.

Notes from death café meetings will be posted on the DeathCafe.com website to inform participants and interested parties of the issues discussed. Comments will not be attributed to individuals and participants are given the opportunity to object to any content being posted in advance.

Your information will never be shared with third parties for the purpose of direct marketing or promoting additional services.

Secure storage of data

I will take all reasonable precautions to keep any personal information collected in the course of preparing and delivering the ceremony secure and backed up.

Contact data and email correspondence will be kept on a personal computer, which is synchronised with a phone, laptop and iPad and password protected. Data pertaining to ceremonies will be stored on Microsoft OneDrive, which is also password protected and encrypted.

Paper records and ceremonies will be kept in a locked filing cabinet when not in use.

Data accuracy

Every effort is made to ensure the accuracy of data. Ceremony plans, including key details, are shared with the data provider to check for accuracy prior to sharing with anyone else. The couples or key mourners also have the opportunity to verify the accuracy of the final ceremony prior to delivery.

Retention of data

Personal data will only be kept for as long as necessary and either deleted or shredded when no longer required. This will take place as soon as is practically possible after the ceremony. The retention periods and methods of disposal are listed in Appendix A.

An anonymised copy of the final ceremony may be kept for my own professional purposes and for assisting with the training and development of other Humanists UK accredited celebrants, with your express permission.

Rectification

Your personal data will be rectified if inaccurate or found incomplete as soon as possible or within a maximum of one month of being notified. The final copy of any ceremony is always agreed in advance with you.

Any other recipients of the personal data will be notified with any amendments. If this is not possible, or proves to involve disproportionate effort, you will be informed about these recipients.

Erasure

You have the right for any information about you to be removed or erased where there is no compelling reason for its continued use. This will take place as soon as is practically possible, or within one week of being notified maximum (unless it is not practically possible to do so). However, a request may be refused if the information is required for legal reasons or to comply with public interest tasks or the exercise of an official duty. Any recipients of the data will be informed.

Restriction of processing

You have the right to restrict the processing of your personal data, for instance if the data is found to be inaccurate. In this case, I am permitted to store the personal data, but not to process it any further.

Data portability

You have the right to obtain and reuse your data for your own purposes. I will make this information available within one month of a request in a format that is structured in a commonly used and machine readable format and in a safe and secure way.

Similarly, I am happy to facilitate the sharing of funeral tributes via the Humanists Funeral Tribute Archive on request. Anyone wanting to do this themselves, must also obtain my permission to share my work in this manner.

Objections

You have a right to object to your information being used for direct marketing or processing for historical research or statistics. I will stop processing the data immediately unless I can demonstrate compelling legitimate grounds for further processing or the purpose is for legal reasons.

Data breaches

In the event of a data breach, I will contact you to inform you of the nature and scale of the breach. I will also take all reasonable steps to limit the disclosure of the data to the minimum.

Any data breaches resulting in a risk to your rights and freedom, e.g., discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage, will be notified to the Information Commissioner's Office (ICO).

A copy of this Data Protection Notice is available on my website at:

<https://humanist.org.uk/catequinn/sample-page/data-protection/>

Appendix A: Nature of information held and legitimate purposes

Categories of information	Weddings	Funerals	Death Café's	Purpose	Storage period	Disposal method
<ul style="list-style-type: none"> Contact details (Name, address, phone numbers, email addresses) 	✓	✓	✓	<p>To contact individuals regarding practical arrangements and sharing draft ceremonies.</p> <p>To mail interested parties about Death Café meetings and notes.</p>	<p>Indefinitely with express consent.</p> <p>Otherwise within one week of a request to erase.</p>	Deleted from computer and synchronised devices
<ul style="list-style-type: none"> Emails 	✓	✓	✓	<p>Record of communications and decisions.</p> <p>Enquiries.</p>	1 month after enquiry/ceremony/death cafe	Deleted from computer and synchronised devices
<ul style="list-style-type: none"> Contracts 	✓				6 years from date of ceremony	Deleted from computer and synchronised devices. Paper copies shredded.

Humanist Ceremonies

Categories of information	Weddings	Funerals	Death Café's	Purpose	Storage period	Disposal method
<ul style="list-style-type: none"> Notes of life history & achievements 	✓	✓		To prepare and deliver the ceremony.	Within one week of ceremony taking place	Deleted from computer and synchronised devices. Paper copies shredded.
<ul style="list-style-type: none"> Notes of special category data including religion, politics, health, sexual orientation 	✓	✓		To prepare and deliver the ceremony.	Within one week of ceremony taking place	Deleted from computer and synchronised devices. Paper copies shredded.
<ul style="list-style-type: none"> Details of the circumstances of death 		✓		To prepare and deliver the ceremony.	Within one week of ceremony taking place	Deleted from computer and synchronised devices. Paper copies shredded.
<ul style="list-style-type: none"> Notes of family & key relationships 	✓	✓		To prepare and deliver the ceremony.	Within one week of ceremony taking place	Deleted from computer and synchronised devices. Paper copies shredded.
<ul style="list-style-type: none"> Notes on v alues and outlooks on life 	✓	✓		To prepare and deliver the ceremony.	Within one week of ceremony taking place	Deleted from computer and synchronised devices. Paper copies shredded.

Humanist Ceremonies

Categories of information	Weddings	Funerals	Death Café's	Purpose	Storage period	Disposal method
<ul style="list-style-type: none"> Personal commitments 	✓			To prepare and deliver the ceremony.	Within one week of ceremony taking place	<p>Deleted from computer and synchronised devices.</p> <p>Paper copies shredded.</p>
<ul style="list-style-type: none"> Ceremony plans 	✓	✓		<p>To agree and document the broad outline of the ceremony.</p> <p>To communicate with third parties involved in organising the ceremony</p>	Within one week of ceremony taking place	<p>Deleted from computer and synchronised devices.</p> <p>Paper copies shredded.</p>
<ul style="list-style-type: none"> Draft ceremony 	✓	✓		To develop the ceremony in collaboration with the participants. Peer review and ongoing accreditation.	Within one week of ceremony taking place	<p>Deleted from computer and synchronised devices.</p> <p>Paper copies shredded.</p>

Humanist Ceremonies

Categories of information	Weddings	Funerals	Death Café's	Purpose	Storage period	Disposal method
<ul style="list-style-type: none"> Final ceremony 	✓	✓		<p>To deliver the ceremony.</p> <p>For personal reference.</p> <p>Supporting the development and training of other celebrants.</p> <p>Peer review and ongoing accreditation.</p> <p>Sharing via the Humanist Funerals Archive.</p>	<p>Anonymised copy stored indefinitely unless permission denied</p> <p>Un-redacted copy for one week after ceremony has taken place</p>	<p>Deleted from computer and synchronised devices.</p> <p>Paper copies shredded.</p>
<ul style="list-style-type: none"> Photographs 	✓	✓		<p>To prepare bespoke keepsake copies of the ceremony.</p> <p>For marketing my services to other potential clients (weddings only).</p>	<p>Indefinitely unless permission is denied or request received to erase, in which case removed within one week of request.</p>	<p>Deleted from computer and synchronised devices.</p> <p>Paper copies shredded.</p>

Humanist Ceremonies

Categories of information	Weddings	Funerals	Death Café's	Purpose	Storage period	Disposal method
<ul style="list-style-type: none"> Feedback and testimonials (provided directly. Those supplied to Humanists UK are covered by their DPN) 	✓	✓		To review my performance. To market my services to other potential clients.	Deleted on request within one week	Deleted from computer and synchronised devices.
<ul style="list-style-type: none"> Invoices and payments 	✓	✓		To collect and account for fees due.	6 years from date of ceremony	Deleted from computer and synchronised devices

Information relating to children

Limited information is collected about children, such as names and relationships to the key protagonist. Permission is sought to include these details in the ceremony. No information about children will be shared via my website or other platforms without the express permission of the parents. Children are able to give their own consent from the age of 16 and above.