

GDPR: DATA PRIVACY NOTICE FOR CUSTOMERS AND SUPPLIERS

Introduction

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data. We will also tell you about your privacy rights and how the data protection law protects you.

This sole trader business ("the business") involves conducting bespoke non-religious Humanist funeral ceremonies for members of the general public. The business owner is Dr Ruth Brown-Shepherd, a Funeral Celebrant accredited by Humanists UK.

This policy sets out the basis on which any personal data collected from you will be processed. Please read the following carefully to understand the business practices regarding your personal data and how it will be treated.

The rules on processing personal data are set out in the General Data Protection Regulation ("GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject - Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private e-mail address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

As a sole trader Dr Ruth Brown-Shepherd, assumes the roles of Data Controller, Data Processor and Data Protection Officer. If you have any queries or complaints the contact details are:

Telephone: +44 (0) 7789 589 614
E-mail: ruth.brown-shepherd@humanistceremonies.org.uk
URL: <https://humanist.org.uk/ruthbrownshepherd>

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioner's Office](#) ("ICO"). Business registration reference is ZA809668.

3. The purposes of processing your personal data

Your personal data is used for the following purposes:

- To communicate with the customer and relevant third parties (such as chapel venue staff, funeral directors and funeral arrangers) about the development and delivery of the ceremony.
- To perform the steps required to enter into a service contract with the customer and deliver the funeral ceremony or memorial.
- To manage contributions from others to the funeral 'Tribute' (such as family members), as requested by the Customer, by communicating with them and conducting research.
- To gain payment for work completed and to maintain the business accounts, as require to comply with English tax laws.
- To maintain accreditation with Humanists UK, quarterly counts of ceremonies conducted are submitted to Humanists UK. All data used for these purposes will be anonymised to maintain confidentiality.
- To support the training and development of other Humanist Celebrants accredited by Humanists UK. All data used for these purposes will be anonymised to maintain confidentiality.
- For continued professional development and to maintain accreditation with Humanist UK, ceremonies are peer reviewed every 3 years and, in this case, copies of the ceremonies are shared with the peer reviewer to complete their assessment. The peer reviewer will maintain confidentiality and will shred/delete any copies of the script within 7 days of the ceremony or memorial.
- To promote Humanist funeral ceremonies on the business website.

4. The categories of personal data concerned and the legal basis for processing your personal data.

The Information Commissioner's Office has confirmed (12.03.18) that **Legitimate Use** is an acceptable basis for storing all data relating to individuals in order to conduct a ceremony or memorial, including data belonging to family or friends who are living and are not the customer.

The lawful basis for processing your general personal data is for the purposes of the legitimate interests of the Data Controller, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject. With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- 'Personal data'** will be collected for the purposes described in clause 3. This will include names, addresses telephone numbers, e-mail addresses, details about a person's life, details about a person's relationships, employment history, education, recreational activities and general interests.
- In cases where information is provided which falls under the **'Special categories of data'**, customers will need to provide written consent from the data subject for the business to use this information for conducting a ceremony or memorial by ticking the relevant boxes when signing the Contract; or by approving the script for presentation in public.

The format of this data will be: i) paper and electronic scripts; ii) paper and electronic information sheets; iii) paper and electronic contracts; iv) emails; v) text messages; vi) LinkedIn messages; vii) WhatsApp messages and viii) existing photographs may be provided by the customer to include in the presentation script.

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with:

- Customers will receive an electronic copy of the first draft of the funeral 'Tribute' to review and provide feedback for accuracy.
- Any staff involved in the ceremony, such as chapel attendants, funeral directors and funeral arrangers.
- Customers will receive a copy of the final presentation script to keep.
- Attendees at the funeral ceremony will hear the verbal delivery of the final script.
- Other funeral celebrants accredited by Humanists UK may receive an anonymised version of the script for training and development purposes, with the customer's written consent.
- Humanists UK Funeral Tribute Archive (<http://www.bishopsgate.org.uk/Library/Special-Collections-and-Archives/Freethought-andHumanism/Humanist-Funeral-Tribute-Archive>) may receive an electronic copy of the funeral tribute, with the customer's written consent.
- Your personal information will not be shared with any third parties for the purpose of direct marketing or promoting additional services.
- Customer testimonials may be published on the business website, with the customer's written consent.
- HM Revenue & Customs may request all business records covering the past 6 years for tax purposes.

7. How long is your personal data kept?

Your personal data will be kept for no longer than reasonably necessary. Your data will only be retained for the following purposes and the below criteria will be used to determine how long to retain your personal data.

Data format	How long it is retained	Treatment of data after use
Service Contract	6 years from ceremony date	Shredded and composted
Invoice and payment records	6 years from ceremony date	Deleted
Customer emails	6 months from ceremony date	Deleted
General e-mail enquiries	3 months from final e-mail without a ceremony booking or any further correspondence	Deleted
Ceremony or memorial scripts (paper copies)	7 days from ceremony date	Shredded and composted
Ceremony or memorial scripts (electronic)	Password protected and anonymised after 12 months before archiving	Anonymised scripts archived indefinitely for reference purposes
Customer contact details (name, address, telephone no. and e-mail address)	Password protected and kept indefinitely with customer consent. Otherwise, retained for 7 days from ceremony date	Deleted
Existing electronic photographs provided for inclusion in the presentation script	7 days from ceremony date	Deleted

8. Providing your personal data

Your personal data is required as it is necessary to enter into a service contract.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data held about you.
- The right to request correction of any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary to retain such data.
- The right to withdraw your consent to the processing of your personal data at any time, where your consent was your lawful basis for processing the data (e.g. any data which falls under the 'Special categories of data').
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction to be placed on further processing.
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests; direct marketing and processing for the purposes of scientific/historical research or statistics).

All legitimate requests will be responded to within one month. Occasionally it may take longer than a month if your request is particularly complex or you have made multiple requests. In this case, you will be notified and kept updated.

10. Transfer of data abroad

The business does not transfer any personal data outside the United Kingdom.

11. Automated decision making

The business does not use any form of automated decision making.

12. Further processing

If the business wishes to use your personal data for a new purpose, not covered by this Data Privacy Notice, then you will be provided with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to the privacy policy

Any changes made to the privacy policy in the future will be posted on the business website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates to the privacy policy.