

Privacy Notice

Central England Co-operative Funeral Plans Ltd

Last Updated: 6th June 2022

Introduction

This Privacy Notice tells you about how Central England Co-operative Funeral Plans uses personal data.

There's a lot of information in this notice but we want you to be properly informed about how Central England Co-operative Funeral Plans uses your data, what your rights are and how you can exercise them.

We'll need to update this Privacy Notice from time to time. Please check the date of the latest change on our website.

If you have any questions that aren't answered below, please get in touch.

Who are we?

Central England Co-operative Funeral Plans is a subsidiary of Central England Co-operative Limited.

Central England Co-operative Funeral Plans is regulated by the Financial Conduct Authority under reference 963168 and is referred to as we, us, our, CEC Funeral Plans or Central England Co-operative Funeral Plans in this privacy notice. We're registered under the Co-operative and Community Benefit Societies Act 2014, number 4842 and our registered address at Central House, Hermes Road, Lichfield, Staffordshire WS13 6RH.

When we can use your personal data

Data protection law sets out a number of grounds on which we may process your data and we must tell you which apply. These are called the 'legal basis' and include:

- **Contractual obligation**, which means that we need to use your data for the purposes of a contract you've agreed, either with us or a third party, or you've agreed we can use the data before entering into a contract. For example, when you take-out a funeral plan with us.
- **Legal compliance**, which means we need personal data to comply with the law. For example, when we need information to help us accommodate individuals with a disability or when a law enforcement agency requires us to pass on details of witnesses to a criminal incident.
- **Legitimate interests**, which means we'll use your data to help us run our business in a way that might reasonably be expected, and which doesn't have a material effect on you. For example when we analyse data to keep up with trends or when we personalise communication for you.

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- **Consent**, which means you have given us your permission. For example, when you tick a box to consent to us contacting you by email. When you give us your consent you may also withdraw it at any time.

Personal data we collect and use

We collect the information we need to respond to an enquiry, set up a pre-paid funeral plan or record your funeral wishes. This includes:

- Your name, address, other contact details and date of birth
- Your membership number for Central England Cooperative and details of any membership cards if you present them.
- The name, address, other contact details and date of birth for the person(s) whose funeral(s) the plan will apply to
- The name of your nominated representative if you nominate one, and consent for us to contact them
- Orders, charges and payments on your account
- Payment information, when you make a payment by credit/debit card and bank details if you pay by direct debit or bank transfer.
- Any other personal data you provide to allow us to make arrangements that meet your requirements which may, for example, include choices of dates, venues, celebrants, memorials, inscriptions, service preferences, religious beliefs (which are referred to as your Funeral Wishes) and arrangements to accommodate individuals with a disability
- Your communication and marketing preferences
- Personal data contained in any communication you may enter into

Special category data is personal data which the law says is more sensitive and so needs more protection. For example, information about an individual's race, ethnic origin, religion or health are all considered special categories of data. The special categories of personal data we might process are:

- Religious preferences: We use this to ensure any religious funeral preferences you have are met
- Any health conditions we are informed of: This information will be used to improve our service and allow us to provide potentially vulnerable customers with the support needed

We may also monitor or record telephone calls to:

- help us monitor the service our colleagues provide
- investigate and resolve complaints
- identify training needs
- ensure we can monitor and adhere to regulatory and quality standards

Calls recorded will normally be held for 42 months. We may also use recorded calls for analytical purposes to understand the call's nature.

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When we're informed of something that could make you vulnerable in some way, we may securely record it for future reference if that's the right thing to do. This is only the case when we are clearly told about a vulnerability. We do this so we can carefully plan how to ensure someone is not disadvantaged in any way.

How we use your personal data

- To handle enquiries and orders, to liaise with you, to provide information required by a crematorium, burial site or service venue, to fulfil your order and to process payments on the grounds of contractual obligation.
- To request feedback on our service on the basis of our legitimate interest in developing our business
- If you're a member of Central England Co-operative and present your membership card, we collect information and use it as set out in the membership section of their Privacy Notice
- We may send you information about our products and services when you have consented to this. We'll create a profile of your interests and preferences so that we can contact you with information most relevant to you.
- To make arrangements to accommodate individuals with a disability on the grounds of a legal obligation.
- To plan for a funeral in line with your religious preferences on the grounds of contractual obligation and your explicit consent.
- If you purchase a service online, we'll collect additional information such as your IP address and any session details.
- To deal with communications including enquiries, complaints and compliments on the grounds of our legitimate interest in managing our relationship with you.
- We use non-identifiable information about purchases for statistical analysis and business planning, for instance to identify trends, to schedule our resources, to improve our products and services and to develop new ones. We do this on the grounds of our legitimate interest in continually improving service to our customers.

Who we share your personal data with

If you have a nominated representative we will share information about your funeral plan with them, such as the existence of the plan, its features and how to make a claim in the event of your death.

Sometimes we share your personal data with organisations we trust to process it on our behalf. They may only use this data for the purpose we agree with them unless they are required by law to process your personal data for other purposes. For example, Central England Co-operative assist with the sale of funeral plans and the sales administration

We may also need to share your personal information with other organisations or individuals:

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Identity and credit reference agencies: To help us fulfil our anti-fraud and money laundering obligations.

Regulators: We may need to share your information with the Financial Conduct Authority for example, to evidence our compliance or assist them in any investigations from any complaints made about us.

Insurance Companies: When we receive the full payment for your Funeral plan, we will take out an insurance policy in your name. This ensures we are able to provide the benefits of the funeral plan in the event of your death, e.g. Royal London Mutual Insurance Society Limited (Royal London Policy).

Our professional advisors: We may need to share information with our auditors, legal advisors and other professional advisors when they need it to give us their professional advice.

Public authorities, agencies and government bodies: We may be required to share your information with bodies such as the police, courts, DVLA or HMRC.

Banks and financial institutions: When you pay by direct debit, we'll share your payment details with the relevant banks.

Card payment services: When you pay by credit/debit card, we pass your payment and card details securely to our card payment service provider. We do not keep your card details.

Debt recovery companies: If any overdue amount is not paid, we may share your personal information with a debt recovery agent.

How long we keep your personal data

We'll keep your personal data only for as long as is necessary for the purposes described in this notice, including where it is needed to comply with our legal obligations, to resolve disputes or to enforce agreements. This means we may keep your personal data for up to seven years after the funeral or redemption/cancellation of a pre-paid funeral plan, unless we're legally required to keep it for longer. Certain cremation records must be kept for 15 years.

We don't keep credit or debit card details.

Where we process personal data

Your personal data won't be transferred or processed outside the European Union unless stated.

Your rights

In respect of your personal data, you have the right to request that we:

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- Allow you access to your personal data, including receiving a copy of it as well as information about how we have processed your data.
- Correct or complete your personal data, if it's incorrect or incomplete.
- Restrict the use of your personal data if:
 - It's not accurate
 - We no longer need it, but you want us to keep it for use in a legal claim
 - You've already asked us to stop using your data but you're waiting to receive confirmation from us as to whether we can comply with your request.
 - It has been used unlawfully but you don't want us to delete it
- Delete your personal data.

Where we're using your personal data with your consent, you can withdraw your consent at any time. If you do this, this'll not affect the lawfulness of the processing prior to the withdrawal.

Where we're using your personal data on the basis of legitimate interests, you can object to us using it this way.

Where we're using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.

You won't normally have to pay a fee to exercise these rights. We may, however, charge a reasonable fee or refuse to comply with a request if it's unfounded or excessive.

If you want to exercise your rights, please contact us at support@funeralplanning.coop

Should you have any concerns about how we may be handling your personal data, please contact us.

If you're unhappy with the outcome of either your request or with our processing of your personal data, you can also lodge a complaint with the Information Commissioner's Office; they can be contacted using the information provided at: <https://ico.org.uk/concerns/>

Contact us

You can contact us in relation to data protection and this Privacy Notice by writing to:

Data Protection Officer
Central England Co-operative Funeral Plans Ltd
Hermes Road
Lichfield
WS13 6RH

or you can email us at support@funeralplanning.coop

It's important that you tell us if any of your details such as your name or address have changed. This will help us to keep your personal data up to date.