

Seaton Leng and Son Ltd.

Data Protection Policy

CONTACT

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WHAT IS PERSONAL DATA

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person". Special category data is personal data which the GDPR 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 may have are met.
- ◆ Any medical conditions relayed to us: this information will be used to improve our service and allow us to provide potentially vulnerable customers with the support they need.

Consent is required for us to process both types of personal data, but it must be explicitly given. Where we are asking you for special categories of data we will always tell you why and how the information will be used. You may withdraw consent at any time by contacting us using the details provided in section 3. If you would like more information on GDPR or the Data Protection Act 2018 and how it impacts you, this can be found on the Information Commissioner's Office (ICO) website at ico.org.uk.

The personal data we would like to collect from/process about you (and the source if not collected directly from you, the data subject) is:

- ◆ Your name, address, date of birth, telephone number and email contact
- ◆ Your religious preferences and / or place of worship if appropriate (this is also classed as special category data as above).

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

- ◆ Funeral finance applications
- ◆ Funeral and/or memorial service fulfilment
- ◆ Funeral repatriation fulfilment
- ◆ End of life planning and funeral plan fulfilment
- ◆ Storage of cremated remains
- ◆ Grave ownership

Our legal basis for processing your personal data may be classed as one of the categories below:

- ◆ Contractual: the processing is necessary to enter into a contract i.e. funeral finance or funeral plan.
- ◆ Consent: you have given consent for us to process your personal data for this specific purpose.
- ◆ Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- ◆ Legitimate interest: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.

CONSENT

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Will we ever share your personal data with anyone else? Yes, we may pass your personal data on to third-party service providers for the following purposes:

- ◆ A council, local authority or crematorium for the purpose of organising cremation of the deceased.
- ◆ A council, local authority, church or cemetery for the purpose of organising burial of the deceased.
- ◆ A minister of religion or nominated celebrant for the purpose of arranging details of the funeral or memorial service.
- ◆ A musician(s) for the purpose of liaising with you for your musical choices for the funeral or memorial service.
- ◆ A florist for the purpose of delivery of floral tributes for the funeral or memorial service.
- ◆ A private autopsy provider for the purpose of organising a faster and non-invasive alternative to Coroner services.
- ◆ An airline, road, rail or sea transport carrier, for the purpose of organising the domestic or international repatriation of a deceased person or for the transportation of ashes.
- ◆ A consulate or embassy for the purpose of arranging international funeral repatriation.
- ◆ A finance provider or company for the purpose of arranging funeral financing.
- ◆ A legal, financial (bank or insurance company) or other representative or manager of the decedent's estate.
- ◆ A funeral plan provider (Ecclesiastical Planning Services Ltd) for the purpose of organising a funeral plan.

Please see EPSL's privacy policy found on their website at www.ecclesiastical.com/privacy-policy for details of how they will use your data.

- ◆ Department of Work and Pensions or HM Revenue and Customs for matters concerning state benefits, pensions or taxation.

This may include special categories of data where appropriate. Any third parties that we may share your data with are obliged to keep your details securely, and to use them in line with the GDPR and Data Protection Act 2018. When your data is no longer required, they will dispose of this in line with their retention period as per the regulation.

RETENTION PERIOD

We will process personal data for the length of time required to fulfil our obligations contractually or legally. We will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

YOUR RIGHT 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 you 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. Ecclesiastical Planning Services Ltd. will endeavour to provide you with the detail we hold on you to allow you to take it to another organisation. This may be limited by technological requirements.
- ◆ 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.

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

Can I find out the personal data that you hold about me?

Yes, you can do this by contacting us using contact details provided in Section 1.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by us or a third party as mentioned above please contact us using the contact details provided in Section 1 above.

If you are unhappy with how your complaint has been handled, you have the right to escalate your complaint to the supervisory authority.

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

0303 123 1113

casework@ico.org.uk

Amendments

Please note that this Privacy Policy is subject to change from time to time. It was last updated in January 2025

Document Control

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR and the Data Protection Act 2018.

If you have any questions regarding our Privacy Policy, please contact us using the contact details provided in Section 1.