



SOUTH-WEST MIDDLESEX CREMATORIUM BOARD

DATA PRIVACY

The South-West Middlesex Crematorium Board (SWMCB) respects your privacy and is committed to protecting your Personal Data.

This privacy policy will inform you as to how we look after your Personal Data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. We may update this Policy from time to time.

This website is not intended for children, and we do not knowingly collect Personal Data relating to children.

As data controllers, each entity is responsible for, and controls, the processing of your Personal Data in accordance with the General Data Protection Regulation 2016/679 (GDPR) and the Data Protection Act 2018 (Act) and any other applicable law in the United Kingdom relating to data protection and / or privacy. “**Personal Data**” means any information that identifies or makes identifiable a natural (living) individual.

You have the right to make a complaint to the Information Commissioner’s Office (ICO), the UK regulator for data protection issues (website at: www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at enquiries@swmcrematorium.gov.uk .

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review, and it is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Please note that the display of any hyperlink and/or reference to any third-party website, system, product or service does not mean that we endorse that third party’s website, products or services and any reliance you place on such hyperlink, reference or advert is done at your own risk. Clicking on those links or enabling those connections may allow third parties to collect or share (personal) data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.



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The data we collect about you and how we collect it

Personal Data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you use our services, the Website, or otherwise deal with us (including where you have made an application via a Funeral Director), we may collect the following Personal Data about you either through direct interactions with you, from third parties or using technologies:

- information relating to the deceased.
- funeral service and booking details.
- funeral director contact information.
- personal information including first and last name and contact information including current residential address, primary email address and/or primary phone number.
- details of any enquiries made by you through the Website, together with details relating to subsequent correspondence (if applicable).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to comply with a legal obligation.
- Arrange and provide cremation services.
- Communicate with funeral directors and families.
- Maintain statutory records.



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Data security

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees and professional advisers who have a business need to know. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

By law we are required to keep your information for a period of 15 years from the date the services are provided to you, to comply with legal and regulatory obligations which we are subject to. Whilst you have the legal right to ask us to stop processing your information for direct marketing purposes (as further detailed in this Policy), we may still be required to hold your information in accordance with this Policy for the purposes of complying with our legal or regulatory obligations.

Where we hold information based on your express consent and have no other legal basis for holding your information, we will keep it until consent is withdrawn.

If required, we will be entitled to hold information for longer periods in order to comply with our legal or regulatory obligations.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. This section sets out your legal rights in respect of any of your Personal Data that we are holding and/or processing. If you wish to exercise any of your legal rights you should put your request in writing to us giving us enough information to identify you and respond to your request.

- You have the right to request access to information about Personal Data that we may hold and/or process about you, including whether or not we are



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holding and/or processing your Personal Data; the extent of the Personal Data we are holding; and the purposes and extent of the processing.

- You have the right to have any inaccurate information we hold about you be corrected and/or updated. If any of the information that you have provided changes, or if you become aware of any inaccuracies in such information, please let us know in writing giving us enough information deal with the change or correction.
- You have the right in certain circumstances to request that we delete all Personal Data we hold about you (the 'right of erasure'). Please note that this right of erasure is not available in all circumstances, for example where we need to retain the Personal Data for legal compliance purposes. If this is the case, we will let you know.
- You have the right in certain circumstances to request that we restrict the processing of your Personal Data, for example where the Personal Data is inaccurate or where you have objected to the processing.
- You have the right to request a copy of the Personal Data we hold about you and to have it provided in a structured format suitable for you to be able to transfer it to a different data controller (the 'right to data portability'). Please note that the right to data portability is available where processing is carried out by automated means and applies to Personal Data you have provided to us, and where the Personal Data is held in reliance on "consent" or "Performance of a contract" as the legal basis for our processing. If you request the right to data portability and it is not available to you, we will let you know.
- You have the right in certain circumstances to object to the processing of your Personal Data. If so, we shall stop processing your Personal Data unless we can demonstrate sufficient and compelling legitimate grounds for continuing the processing which override your own interests. If, as a result of your circumstances, you do not have the right to object to such processing then we will let you know.
- You have the right in certain circumstances not to be subject to a decision based solely on automated processing, for example where a computer algorithm (rather than a person) makes decisions which affect your contractual rights. Please note that this right is not available in all circumstances. If you request this right and it is not available to you, we will let you know.
- You have the right to object to direct marketing.

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.



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What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.