



# Privacy Policy

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the General Data Protection Regulation.

## 2. Responsibilities

2.1 Noyon’s Funeral Services (also referred to in this document as “we”, “us” or “our”), is responsible for ensuring that this notice is made available to data subjects prior to Noyon’s Funeral Services collecting/processing their personal data.

2.2 All personnel representing Noyon’s Funeral Services who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject’s attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

Noyon’s Funeral Services of Abigail Villa, Houmet Lane, Vale, Guernsey GY6 8JF is a Guernsey based, family owned and managed independent funeral business.

The personal data we would like to process on you is:

Personal data type:	Source
Personal data may consist of any of the following depending on which service(s) you require from us: Name and title, address, date of birth, contact phone number(s), email address, relationship(s).	Obtained or collated direct from client or persons enquiring about or requiring our services whether by phone, email, post, website or in person.

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

- fulfilment of the funeral service of the person for whom you will have contracted us or the noting of formal wishes, including administration and working with third parties on your behalf.
- supply of funeral specific goods.
- to reply to enquiries about our services.
- in preparing submissions for prepaid funeral plans from providers on behalf of the applicant and subsequent fulfilment of funeral service.

Our legal basis for processing personal data:

- steps leading to a contract, or the fulfilment of a contract.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- GDPR indicates that organisations can continue to lawfully process personal data from their existing database (i.e. without re-consent) if they can demonstrate “legitimate interest”. Accordingly, we retain and process personal data following the completion of a contract as an archive only, for potential reference purposes in arranging future connected funerals.

Where processing of ‘special category data’ is necessary:

- ‘special category data’ (ie. religious beliefs, ethnicity etc.). Where circumstances require that we obtain and process ‘special category data’ in order to fulfil our obligations, you will be asked to provide express consent before we agree to provide our services to you.



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Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not process your personal data unless there is another legal ground for us to do so (either that we have obtained your consent to the processing or it is necessary for us to perform our contract with you or to comply with our legal obligations).

## 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for Noyon's Funeral Services to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us to update your preferences.

## 3.3 Disclosure

Noyon's Funeral Services will not pass on your personal data to third parties without first obtaining your consent however we may share your personal data with the following third parties who assist us with administering the provision of our services to you:

- Minister/celebrant/secular officiant, coordinator for church/other venue for ceremony
- Cemetery/crematorium/stonemason
- Organist/pianist/musician(s)
- Medical practitioners
- Relevant States Departments, ie. HSSD, Greffe, Law Officers, Police
- Other Funeral Directors where repatriation is required
- Funeral Plan providers
- Our accountants/auditors who verify our financial records and other professional experts whom we may instruct from time to time
- Any third party you ask us to share your data with

## 3.4 Retention period

Noyon's Funeral Services will process personal data for as long as is necessary to fulfil the service(s) for which we have been contracted for and close the contract financially. We will store the personal data indefinitely, as an archive only, for potential reference purposes in arranging future connected funerals of relatives.

## 3.5 Your rights 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 to 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.
- Right to object – you have the right to object to certain types of processing such as direct marketing.



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- Right to object to automated processing, including profiling – Automated decisions and profiling are used for marketing based organisations. Noyon’s Funeral Services does not use personal data for such purposes.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

## 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Noyon’s Funeral Services (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Noyon’s Funeral Services.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Noyon’s Funeral Services contact details</b>
Contact Name:	Office of the Data Protection Commissioner	Juliet Carré Ken Carré
Address:	St Martin’s House Le Bordage St. Peter Port Guernsey GY1 1BR	Abigail Villa Houmet Lane Vale Guernsey GY6 8JF
Email:	enquiries@dataci.org	noyonsfuneral@suremail.gg
Telephone:	(01481) 742074	(01481) 249778

## 3.7 Privacy statement

Read more about how and why we use your data on our website: [www.noyonsfuneral.com](http://www.noyonsfuneral.com)

This document was last updated on 22<sup>nd</sup> March 2019.

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## Online privacy statement

### 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”.

### How we use your information

This privacy notice tells you how we, Noyon's Funeral Services, will collect and use your personal data for provision of services, complaints etc.

### Why does Noyon's Funeral Services need to collect and store personal data?

In order for us to provide you with a funeral service, purchase of funeral specific goods or the formal noting of Wishes or a Pre-paid Funeral Plan we need to collect personal data in order to fulfil the contract and for any related correspondence. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, Noyon's Funeral Services would contact you for separate consent.

### Will Noyon's Funeral Services share my personal data with anyone else?

We may pass your personal data on to required third party service providers in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on behalf of Noyon's Funeral Services. If we have need to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do so otherwise.

### How will Noyon's Funeral Services use the personal data it collects about me?

Noyon's Funeral Services 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. Noyon's Funeral Services is 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.

### Under what circumstances will Noyon's Funeral Services contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. We will need to keep in contact until the contract with you has been completed or to respond to any enquiries. We do not sell or share your data with third parties for marketing purposes and undertake to minimise the risk of unauthorised access or disclosure.

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## Can I find out the personal data that the organisation holds about me?

Noyon's Funeral Services, at your request, can confirm what information we hold about you and how it is processed. If we do hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Noyon's Funeral Services or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.