

Privacy Notice

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that Southern Co-operative Funerals Limited takes a range of measures to keep everyone safe.

The easing of social and economic lockdown measures following the COVID-19 outbreak is being supported by the NHS Test and Trace. We are required to assist this service by keeping a record of our clients and visitors, usually in relation to funeral services and cremations, this will be the applicant so we can provide the NHS with details of those clients and visitors, if requested, under Test and Trace. In cases where the applicant does not wish to provide contact details for this purpose, we will request the details from someone else in the same group. If someone other than the applicant provides contact details, we will destroy the information securely after 21 days. In relation to the applicant's data, we will retain the information in accordance with the terms of this privacy notice as we require it for additional purposes related to the primary reasons it was collected. This privacy notice sets out your rights in relation to the data we hold for these reasons.

Alternatively, we may ask you to scan a QR code when you arrive, using the NHS COVID-19 app in which case we will not have access to your details and will not be processing your data for these reasons. The app is operated by a third party and your details will be processed according to the app's privacy policy. You can find out more on the QR code Test and Trace here <https://www.nhs.uk> or the app <https://covid19.nhs.uk>

There is a legal obligation to provide this information. The lawful basis we are relying on to collect this data is that it is a legal requirement in accordance with government regulations.

You can find out more on Test and Trace here: <https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>

INTRODUCTION

This is Southern Co-operative Funerals Limited's ("Southern Co-operative Funerals") privacy notice. We respect your privacy and are committed to protecting your personal data. This privacy notice tells you how we look after your personal data when you visit our website (regardless of where you visit it from) or when we collect it in branch about your privacy rights generally in relation to the information we hold about you as a client or otherwise and how the law protects you.

Please refer to the Glossary at paragraph 10 at the end to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Southern Co-operative Funerals collects and processes your personal data.

Our website is not intended for children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Southern Co-operative Funerals is the data controller in most cases, for example, in respect of data collected through your use of this website and where you arrange funeral services and cremations with us and when you visit our branch and provide your contact details for Test and Trace purposes. We also receive data about you where you apply for funding through our community support programmes.

Southern Co-operative Funerals is a member of The Southern Co-operative Limited (Southern Co-op) group of companies. Data is shared with other group companies where necessary for auditing purposes or where administrative services are provided internally within the group. The identity of these companies is set out in the Glossary at paragraph 10.

Data collected as a result of our relationship as an employer is detailed in a separate privacy notice for this purpose.

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, our use of your data or anything relating to the data we hold about you, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Southern Co-operative Funerals Limited (Registered number: 00382640)

DPO: dataprotectionofficer@southerncoops.co.uk

Postal address: 1000 Lakeside, Western Road, Portsmouth, P06 3FE

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 28 July 2021. Historic versions can be obtained by contacting us.

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

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share 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 notice of other websites.

2. THE DATA WE COLLECT ABOUT YOU

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

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title, date of birth and gender and your image.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us whether through the use of your Southern Co-op membership card or otherwise.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes purchases or orders made by you, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Bespoke Data** includes in individual cases specific data such as health information provided in relation to a specific enquiry or arrangement.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your website Usage Data to calculate the percentage of users accessing a specific website feature or

anonymised customer data may be shared with a partner to validate market profiles designed to identify potential new store locations. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect **Special Categories of Personal Data** about you in branch (this may include 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). We also collect biometric data in our use of CCTV systems in our branches. We do not collect any information about criminal convictions and offences. Aspects of this data may be held for our colleagues, details of which are covered in our Colleague Privacy Notice.

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 funeral services and cremations). In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise, or through meetings with our colleagues. This includes personal data you provide when you:
 - purchase our products or services which could include funeral and cremation products or services;
 - request marketing to be sent to you;
 - enter a promotion or survey;
 - give us some feedback;
 - give us your details for Test and Trace; or
 - visit our branches and have your image captured on CCTV.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as independent funeral directors who are arranging for us to provide services to you on their behalf, or from review sites such as Google, Facebook etc. when you carry out a review of our business or services.

4. 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 perform the contract we are about to enter into or have entered into with you such as when you join as a member or purchase products or services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests such as where we analyse data in order to improve our products and services.
- Where we need to comply with a legal or regulatory obligation for example in relation to reducing or tackling criminal activity.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of the main ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground or basis depending on the specific purpose for which we are using your data. Please contact dataprotectionofficer@southerncoops.co.uk if you need details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To process and deliver an order or service to you as a client including:</p> <p>(a) Provide funeral and cremation services to you, manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p> <p>(c) Inform you about memorial products and services and assistance</p> <p>(d) Inform you about other services we offer such as bereavement support and memorial events</p>	<p>Identity</p> <p>Contact</p> <p>Financial</p> <p>Transaction</p> <p>Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Performance of a contract with you and necessary for our legitimate interests (to recover debts due to us)</p> <p>(c) Performance of a contact with you and necessary for our legitimate interest (to provide a professional and sensitive service in line with good industry practice)</p> <p>(d) Performance of a contract with you and necessary for our legitimate interest (to provide a professional and sensitive service in line with good industry practice)</p>

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy notice</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)</p>
<p>To enable you to complete a survey</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity</p> <p>Contact</p> <p>Technical</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Identity</p> <p>Contact</p> <p>Profile</p> <p>Usage</p> <p>Marketing and Communications</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, client relationships and experiences</p>	<p>Usage</p> <p>Technical</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

To comply with government regulations such as Test and Trace	Identity Contact	Necessary to comply with a legal obligation
To use CCTV and other image capture technology eg facial recognition and automatic number plate recognition technology and other technologies which may include the collection of special category data and other processing activities and technologies to protect our business and the safety of our colleagues, members and customers	Identity Contact Usage Bespoke	Necessary for our legitimate interests (to protect our business against criminal activity and to protect the safety of our colleagues, members and customers)

CCTV

We use CCTV and other image capture technology in our stores and funeral homes to protect our business, colleagues and customers. Our CCTV policy is available on request from dataprotectionofficer@southerncoops.co.uk

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us only if you have requested this sort of information from us.

MARKETING

We will only tell you about the products and services offered by entities outside the group of companies of which Southern Co-operative Funerals is a member, such as our Charity Partners or other trusted third parties, if you have asked us to do so by consenting to this form of marketing communication when telling us about your preferences. We will not pass your personal data to these third parties.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out or unsubscribe links on any marketing message sent to you or by contacting Southern Co-operative Funerals or by emailing dataprotectionofficer@southerncoops.co.uk

Where you opt out of receiving these marketing messages, this will not apply to any personal data provided to us as a result of your relationship as a member of Southern Co-op or a product/service purchase and we will continue to be permitted to contact you in relation to these matters provided we have a lawful basis to do so. Please see Southern Co-op's privacy notice for more information.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact dataprotectionofficer@southerncoops.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purposes set out in the table in paragraph 4 above. These may be Internal Third Parties, such as other companies within the same group of companies as Southern Co-operative Funerals or External Third Parties such as service providers with expertise not available in-house as set out in the Glossary at paragraph 10. We may also pass your details to funeral service professionals such as ministers, monumental masons, cremators, specialist funeral service providers etc. so that the funeral or cremation you require can be provided. Please see the Glossary at paragraph 10 for more details.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**), however, systems held to hold personal data may be accessed by system providers, or be hosted, outside of the European Economic Area. Where this is the case we require our system providers and host to secure your personal data in a manner consistent with the requirements of UK law.

7. 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, agents, contractors and other third parties 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.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or other reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting our Data Protection Officer on dataprotectionofficer@southerncoops.co.uk

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may 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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data as set out below:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or

those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact Southern Co-operative Funerals or the Data Protection Officer by emailing: dataprotectionofficer@southerncoops.co.uk

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 may refuse to comply with your request in these circumstances.

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 may 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.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting dataprotectionofficer@southerncoops.co.uk

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Consent means processing your personal data where we have your specific consent to do so. You have a legal right to remove or amend this consent by contacting dataprotectionofficer@southerncoops.co.uk

INTERNAL THIRD PARTIES

Southern Co-operative Funerals is a member of The Southern Co-operative Limited (Southern Co-op) group of companies.

Other companies in the Southern Co-op group acting as controllers or processors and who are based in the UK and who provide products and services:

Company	Products/services
The Southern Co-operative Limited	Food and retail convenience stores
Mutual Services (Portsmouth) Limited	Funeral services
South of England Funeral Partners Limited	Crematorium services at The Oaks
East Devon Crematorium Limited	Crematorium services at East Devon
Sussex Woodlands Limited	Natural burial ground services at Clayton Wood

EXTERNAL THIRD PARTIES

These are third parties outside the Southern Co-op group which provide services where we do not have the expertise or resources to provide them in house or to whom we are required to pass on your data in order to fulfil the relationship we have with you or for other legal reasons. Examples of these entities are set out below:

- Service providers acting as processors who provide IT and system administration services, CCTV services, digital videoing, broadcast, streaming and photographic service providers, email deployment providers.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- Service providers such as market researchers, advertising agencies, local authorities, debt collection services providers, mailing house fulfilment, funeral service providers (for example, funeral directors, memorial products and services providers, officiants, specialist funeral service providers etc.), etc.
- NHS acting as processors for purposes of Test and Trace.

Owner	DEPARTMENT	Corporate Affairs
Date	DATE UPDATED	28 July 2021
Version	VERSION NUMBER	v.4
Approval	JOB ROLE	Director of Corporate Affairs