

# Trusted provider of quality funeral plans for almost 40 years



## **Privacy Policy**

In this Privacy Policy the terms, 'we' or 'us' is Golden Leaves Funeral Plans Ltd.

We are registered with the UK Information Commissioner's Office (ICO) as a data controller under registration number Z6912215.

Your privacy is important to us and we are committed to keeping your information secure and managing it in accordance with our legal responsibilities under applicable data protection laws.

Please read this Privacy Statement carefully as it contains important information to help you understand how and why we process any personal information that you give to us.

#### **What Information We Collect**

We process personal information which you give us:

- As a customer to provide and manage your funeral plans
- · Whilst servicing your account through our website, in writing or over the phone
- If you request information or assistance from us

## What personal information we process

This includes your:

- Personal details such as your name, address, date of birth, address, telephone number, email address and next of kin details.
- Bank details such as your credit or debit card details and bank account number

Where you authorise a third party to act on your behalf, for example by setting up an Executor, Power of Attorney or a preferred Funeral Director we will record the individual's name, address and telephone number.

## **Special Categories Of Personal Data**

Special categories of personal data include information about an individual's health and other categories of personal information which are closely protected (e.g. ethnicity or biometrics).

We will process sensitive classes of information that may include physical or mental health details, racial or ethnic origin, religious or other beliefs and trade union membership where you have voluntarily provided this information to us and have agreed that we can use this information to deliver products and services to you. Where possible we shall seek to minimise the collection and use of such special categories of personal data.

## **How We Use Your Information**

We use your information to:

- Provide funeral services
- · Provide and service your account
- Resolve queries
- · Comply with legal obligations for the prevention of financial crime and money laundering

We will process your information where we have a legitimate interest to do so, where you have provided your consent, where we permitted by law or to comply with applicable law and regulation.











Purpose	Legal Basis
Providing a service and internal processing	
To provide you with suitable funeral products and services	<ul> <li>Legitimate interest to provide and manage the service</li> <li>Where special categories of personal data are processed, these are necessary to assess your needs</li> </ul>
To service and administer your account including managing your payments	Legitimate interests to provide and manage the service
To verify the identity of our customers	• To comply with legal obligations to prevent money laundering
To confirm, update and improve our customer records	• To comply with legal obligations in the Data Protection regulations
To provide you with any information on the services that you have requested	• Legitimate interests to provide information on the services you have requested
Relationship Management	
To manage and develop our relationship with you	• Legitimate interest to service your account and improve our service to you
To inform you of products and services that may be of interest to you, where you have chosen to be made aware of this	• With your consent
Training and development	
For training purposes and to improve our service to you	Legitimate interests to improve our services and develop our employees
Complying with Legal Obligations	
To prevent, investigate and prosecute crime, fraud and money laundering	• To comply with legal obligations for prevention of financial crime and money laundering
If we are obliged to disclose information by reason of any law, regulation or court order	To comply with legal obligations
Other	
To transfer information to any entity which may acquire rights in us	Legitimate interests for commercial interests
For any other purpose to which you agree.	• With your consent

#### **How We Retain Your Personal Information**

We will retain your personal information in accordance with applicable laws. We will take reasonable steps to destroy or anonymise personal information we no longer need for the purposes we have set our above. Our retention periods are:

Type of Personal Information	Retention Period
General personal data which includes your normal personal identity data	<ul> <li>6 years after the end of our relationship with you or</li> <li>For your life time where you have continued your plan with us</li> </ul>
Financial Information which includes your bank account details and credit or debit card details	• Up to 1 month after the full payment of your plan
Special categories of personal data	<ul> <li>Up until you tell us that you no longer want us to retain the data or</li> <li>6 years after the end of our relationship with you or</li> <li>For your life time where you have continued your plan with us</li> </ul>

## **How We Share Your Information**

Where necessary or required we share information with:

- Our agents/introducers where they have referred you to us and are acting as our processors
- · Funeral directors who will provide the guaranteed service element of the plan you are purchasing
- Executors will administer your plan
- Power of Attorney who is instructed on your behalf
- Our Insurance providers who will administer any insurance policy you have chosen through us and they will also collect the premiums.
- Other family, associates and representatives you have asked us to share your information with.

## **Information Security**

We invest appropriate resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and we cannot be held responsible for unauthorised or unintended access that is beyond our control.

### **Updates**

We will keep this Privacy Statement under review and make updates from time to time. Any minor changes to this Privacy Statement will be posted on this page and we will communicate any major changes to you.

#### **Cookies**

Cookies are small tags, stored in your browser, which allow us to identify you as you move through the site. They often include an anonymous unique identifier that is sent to your browser from a website's computer and stored on your computer's hard drive. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a web site to access the cookies it has already sent to you, not the cookies sent to you by other sites.

It is very common for sites to do this whenever a user visits the site in order to track online traffic flows. Cookies also record information about your online preferences. Users have the opportunity to set their computers to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. Choosing the last of these options means that certain personalised services cannot then be provided to that user and accordingly you may not be able to take full advantage of all of the features available on our website. Browsers vary; the "Help" menu of your browser will tell you how to change your cookie preferences. If you have set your computer to reject cookies you can still browse our website anonymously until such time as you wish to register for any services.

#### Links

Where links are provided to other websites it should be noted that they are not and cannot be governed by our Privacy Statement. We cannot guarantee your privacy when you access other websites through any link provided on our website.

## **Your Rights**

You have the right to request copies of your personal information and details of how we use that information. If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased.

You also have a right, in certain circumstances, to object to our processing of your personal information, to require us to stop processing your personal information and/or to withdraw your agreement to processing based on 'consent'. These rights do not apply where we have other legal justifications to continue processing your data or an overriding legitimate interest.

In relation to all of these rights, please write to us at the address below.

## **Complaints Process**

We value all our customers. However, if you feel that we have not met your expected level of service, please contact us on 0800 85 44 48. You can also email on <a href="mailto:customerservices@goldenleaves.com">customerservices@goldenleaves.com</a> or write to Golden Leaves Funeral Plans, 16th Floor, No1 Croydon, 12-16 Addiscombe Road, Croydon, CR0 0XT.

If you're not happy with the way we have handled your complaint, you can also raise the matter with the Financial Ombudsman Service (FOS) by visiting them at <a href="https://www.financial-ombudsman.org.uk">www.financial-ombudsman.org.uk</a>. You can also contact FOS at Exchange Tower, London E14 9SR, 0800 023 4567, email - <a href="mailto:complaint.info@financial-ombudsman.org.uk">complaint.info@financial-ombudsman.org.uk</a>.

#### **Contact Us**

You can contact us by writing to us at:

Golden Leaves Funeral Plans 16th Floor, No.1 Croydon, 12-16 Addiscombe Road, Croydon, CRO OXT

Telephone queries can be made to:

0800 85 44 48