

Updated on: 13th August 2018

WHO WE ARE

The internet site www.deceasedpreferenceservice.co.uk ("Site") is provided by Lifecycle Bereavement Services Limited ("LBSL"). LBSL is a Private Limited Company, registered in England and Wales (number 10374896) whose registered office is 1 Angel Square, Manchester, M4 4AR.

We are committed to protecting your privacy and security.

This privacy policy ("Policy") sets out the basis on which any personal data we collect from you, or that you provide to us will be processed by us. Please read this Policy carefully to understand our views and practices regarding your personal data and how we will ensure your data remains secure.

If you have any requests concerning your personal information or any queries with regard to the practices laid out below please contact us at info@deceasedpreferenceservice.co.uk.

By using the Site, you accept this Policy and you agree to comply with it.

We may make changes to this Policy without notice to you. Please ensure that you review the Policy regularly as you will be deemed to have accepted any variation if you continue to use the Site after it has been posted.

INFORMATION THAT WE COLLECT

We collect personal information which you volunteer and by which you may be personally identified, such as your name, your postal address, your e-mail address, your telephone number and your relationship to the deceased ("personal information"), for example:

- the details that you provide over the telephone or in writing to the Deceased Preference Service and/or the Death Notification Service; and
- details of your visits to the Site.

We also collect information which is about you but individually does not identify you. We collect this information:

- directly from you when you provide it to us.
- automatically as you navigate through the Site. Information collected automatically may include usage details, IP addresses and information collected through cookies and tracking technologies.

WHY WE COLLECT INFORMATION FROM YOU

Registration on the Deceased Preference Service and/or the Death Notification Service is free. We collect the information from you to help us, or third parties, provide the services to you or to comply with our legal obligations. We may also use your personal information for ancillary internal management purposes which are compatible with the original purpose for which your information has been collected.

We use the information we collect from you as follows:

- when you sign up to the Deceased Preference Service, we will share your information with Wilmington Millennium Limited ("WML"). WML is the owner of a product called Mortascreen, a database which sets out information of deceased individuals (including their addresses). The database is used by businesses for fraud prevention and ID verification purposes, and also to stop marketing communications.

Please see the following link for WML's privacy policy, which provides more details on how your personal information will be treated by WML: <http://www.mortascreen.co.uk/privacy>

- when you sign up to the Death Notification Service, we will share your information with the Bereavement Advice Centre (“the Centre”). The Centre is a free helpline and web-based information service provided by Simplify Probate. Simplify Probate forms part of the Co-Operative Group Limited.

Please see the following link for the Centre’s (and the Co-Operative Group’s) privacy policy, which provides more details on how your personal information will be treated by the Centre: <https://www.coop.co.uk/privacy-notice>

- If you visit our Site we may also collect information about your visit through the use of website cookies in order to improve your user experience (for more information see the section below titled ‘Use of Cookies’.

We will not use your personal information for any purpose not explained in this Policy.

DISCLOSURE OF YOUR INFORMATION

We will only disclose personal information to reputable companies and suppliers we engage to process data on our behalf (which may include companies within our group).

We may disclose your personal information to any member of our group, which means our ultimate holding company and its subsidiaries.

In addition to those parties set out under **WHY WE COLLECT INFORMATION FROM YOU**, we may also disclose your personal information to other third parties in the following circumstances:

- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply and other agreements; or to protect the rights, property, or safety of us, our customers, or others.
- if we believe disclosure is necessary or appropriate to protect the rights, property or safety of LBSL or our customers or others.

HOW WE STORE YOUR DATA

Any personal data you give to us is held in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (“the GDPR”). We store this data on secure servers. Once captured the data is held and processed under contract and licence in the Philippines. Once offshore all data is processed in accordance with UK Data Protection Law enforced by International Data Transfer Agreements.

On registration to the Site you are required to choose a member ID and password. You are responsible for keeping these confidential. You should not share them with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data when it is transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG WILL WE KEEP YOUR DATA FOR?

We will only keep your personal details for a maximum of 3 years or as long as you want. The terms of the GDPR do not put a time limit on the amount of time we can hold your details but advises that by holding them our proposition must still be relevant. You can withdraw your consent to us retaining your personal information at any time.

YOUR RIGHTS

The GDPR provides the following rights for individuals:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling
9. Right to withdraw consent at any time where relevant
10. Right to lodge a complaint with a supervisory body

Right to be informed – When we collect your data we have to tell you what we are going to do with it primarily through this Privacy Policy and consent statement.

Right of access – You have the right to contact us in writing to request details of the information we hold about you.

Right of rectification – You have the right to ask us to rectify information that we hold about you if this is inaccurate or incomplete.

Right to erasure – This is also known as the right to be forgotten and gives you the right to request your information to be removed if there is no compelling reason for its continued processing. A word of warning though, we keep a list of people who have asked not to be contacted which is used to ensure that you receive no further marketing information from the Lifecycle Group or client from the result of our activity. Without this list your data could enter our system again from another source and we would have no record of the fact that you asked us not to contact you.

Right to restrict processing – This is the alternative to erasure and gives you the right to tell us to stop processing your data but allowing us to keep enough information about you to ensure that you're wishes are respected in the future.

Right to data portability – This gives you the right to ask the holder of your information to transfer that information to another business. This right would be most commonly used if you were switching banks, insurance companies, utility companies or mobile phone companies.

Right to object – You have the right to object to the processing of your data for marketing purposes and profiling for marketing purposes. Your rights and freedoms override our interests.

Rights related to automated decision making including profiling – We do not use automated decision making processes which would have a potentially damaging effect on the information we hold about you. But if we did you have the right to obtain human intervention, express your point of view and obtain an explanation of the decision and challenge it.

Rights to withdrawn consent at any time where relevant – You have the right to withdraw your consent to the processing of your information at any time and we must provide you with the information to need to do so at the time we collect your data and each time we contact you. You can withdraw consent in the following way:

- In writing to the: Compliance Manager, Lifecycle Bereavement Services Limited, Freepost RRZC-SYCA-AGEG, Deceased Preference Service, DDC OS, The Data Solutions Centre, Manton Wood Enterprise Park, Worksop, S80 2RT.
- Or by telephoning our compliance team on 0800 068 4433.
- Or emailing info@deceasedpreferenceservice.co.uk.

Right to lodge a complaint with a supervisory authority – If we cannot deal with your complaint to your satisfaction you also have the right to complain to a relevant supervisory authority which include:

- The Information Commissioners Office – <https://ico.org.uk/concerns>
- The Direct Marketing Association – <https://dma.org.uk/contact> and
- The Advertising Standards Authority – <https://www.asa.org.uk/make-a-complaint.html>

LINKS TO OTHER WEBSITES

The Site may include links to other internet sites. Please note that these internet sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these internet sites.

CONTACT

To ask questions or comment about this Policy and our privacy practices, please email info@deceasedpreferenceservice.co.uk.