

CAPITAL LAW

LOW COST FUNERAL LIMITED – PRIVACY AND COOKIE POLICY

1. Introduction to this Policy

- 1.1. This website is brought to you by Low Cost Funeral Limited (“**we**”, “**us**” or “**our**”). We are a company registered in England and Wales under company number 10119791 and have our registered office at The Pool House Bicester Road, Stratton Audley, Bicester, United Kingdom, OX27 9BS.
- 1.2. We take the privacy of our website/app users very seriously. This Privacy and Cookie Policy (the “**Policy**”) explains how we collect, store and use information about you when you access or use this website, all associated web pages and any associated mobile applications or other software applications (together the “**Site**”). This Policy also explains how we use cookies.
- 1.3. We ask that you read this Policy carefully as it contains important information about how we will use your information. By accessing or using the Site you agree to be bound by, and comply with, this Policy and the documents referred to in it (including our website terms of use available at <http://www.low-cost-funeral.co.uk/wp-content/uploads/terms-of-use.pdf> If you do not agree with or accept this Policy, you should stop using the Site immediately.
- 1.4. We may update this Policy from time to time in accordance with clause 14 below. This Policy was last updated on 19th September 2016.

2. Data Protection

- 2.1. References in this Policy to:
 - 2.1.1. “**Data Protection Law**” means the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended from time to time, and all other applicable privacy and data protection laws and regulations, as well as any guidance and/or codes of practice issued from time to time by the Information Commissioner; and
 - 2.1.2. “**Personal Data**”, “**Data Controller**” and “**Data Processor**” and “**processing**” shall have the meanings given under applicable Data Protection Law.
- 2.2. For the purposes of the Data Protection Act 1998, we (Low Cost Funeral Limited) are the Data Controller and therefore we are responsible for, and control the processing of, your Personal Data in accordance with Data Protection Law. “Personal Data” has a legal definition but, in brief, it refers to information from which a living person can be identified. Such information must be protected in accordance with Data Protection Law.

3. Information we may collect about you

- 3.1. We will collect information (“**Information**”) about you when you visit our Site, sign up to receive emails or other correspondence from us or do business with us (whether through our Site or otherwise). Some of the Information may constitute or include Personal Data.
- 3.2. We may monitor your use of the Site through cookies and similar tracking technologies. We may also monitor traffic, location and other data and information about visitors to our Site. Such data and information, to the extent that you are individually identifiable from it, shall constitute Information as defined above.

However, some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. See clause 13 below for further information on our use of cookies.

- 3.3. Occasionally we may receive information about you from other sources which we will add to the information we already hold about you in order to help us carry out the activities listed below.

4. How we use your Information

We will process your Information for the following purposes:

- 4.1. to contact you in relation to any enquiry or order you send to us;
- 4.2. to provide services to you;
- 4.3. to conduct research, statistical analysis and behavioural analysis;
- 4.4. to provide insights based on aggregated, anonymous data collected through the research and analysis referred to at 4.3 above;
- 4.5. to contact you for marketing purposes (see 'Marketing and opting out' below);
- 4.6. to disclose your information to selected third parties as permitted by this policy (see clause 7 below);
- 4.7. to customise the Site and its content to your particular preferences;
- 4.8. to notify you of any changes to the Site or to our services that may affect you;
- 4.9. for security vetting; and
- 4.10. to improve our services.

5. Your consent

By submitting your Information you consent to the processing of that Information as set out in this policy.

6. Marketing and opting out

- 6.1. If you have given permission, we may contact you by mail, telephone and email about our products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to use your data for such purposes. If you prefer not to receive any direct marketing communications from us, or you no longer wish to receive them, you can opt out at any time (see below).
- 6.2. If you have given permission, we may contact you by mail, telephone and email to provide information about products, services, promotions, special offers and other information we think may be of interest to you from carefully selected third parties. We will inform you (before collecting your data) if we intend to use your data for such purposes. If you would rather not receive such third party marketing information from us, or you no longer wish to receive it, you can opt out at any time (see below).

- 6.3. If you have given permission, we may share your personal data with carefully selected third party organisations and business partners and they may contact you directly (unless you have asked them not to do so) by mail, telephone and email about products, services, promotions and special offers that may be of interest to you. We will inform you (before collecting your data) and seek your permission if we intend to disclose your data to third parties for such purposes. If you prefer not to receive direct marketing communications from our business partners, or you no longer wish to receive them, you can opt out at any time (see below).
- 6.4. You have the right at any time to ask us, or any third party, to stop processing your information for direct marketing purposes. If you wish to exercise this right, you should contact us by sending an email to info@low-cost-funeral.co.uk, or contact the relevant third party using their given contact details, giving us or them enough information to identify you and deal with your request. Alternatively, you can follow the unsubscribe instructions in emails you receive from us or them.

7. Disclosure of your information

- 7.1. We may disclose your Information to:
- 7.1.1. other companies within our group;
 - 7.1.2. any of our associated companies being; Memoria Limited; Kirkleatham Memorial Limited; Amber Valley Memorial Limited; South Leicester Memorial Limited; Waveney Memorial Limited; Denbighshire Memorial Limited; North Herts Memorial Limited;
 - 7.1.3. our agents and service providers who help us to provide our services (and we will ensure they have appropriate measures in place to protect your Information);
 - 7.1.4. law enforcement agencies and/or HMRC in connection with any investigation to help prevent unlawful activity; and
 - 7.1.5. third parties if you have specifically consented to us doing so.
- 7.2. We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified) to analytics and search engine providers to assist us in the improvement and optimisation of the Site.
- 7.3. If our business is sold or integrated with another business your Information may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

8. Keeping your Information secure

- 8.1. We will use technical and organisational measures in accordance with good industry practice to safeguard your Information, including the use of data encryption.
- 8.2. While we will use all reasonable efforts to safeguard your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Information that is transferred from you or to you via the internet.

9. Monitoring

We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of provision of services, quality assurance, training, fraud prevention and compliance purposes.

10. Overseas transfers

The Information you provide may be transferred to countries outside the European Economic Area ('EEA') that do not have similar protections in place regarding your data and restrictions on its use as set out in this Policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your Information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your Information you consent to these transfers for the purposes specified in this Policy.

11. Information about other individuals

If you give us information on behalf of a third party, you confirm that the third party has appointed you to act on his/her/their behalf and has agreed that you can: give consent on his/her/their behalf to the processing of his/her/their Information; receive on his/her/their behalf any data protection notices; and give consent to the transfer of his/her/their Information abroad (if applicable).

12. Your rights

- 12.1. If you are an individual, you have the right (subject to the payment of a small fee) to request access to Personal Data that we may process about you. If you wish to exercise this right, you should put your request in writing to us giving us enough information to identify you and deal with your request.
- 12.2. We want to ensure that Information we hold about you is accurate and up to date. 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 to identify you and deal with the change or correction (as applicable).

13. Cookies

- 13.1. Our Site uses cookies to distinguish you from other users. Cookies are text files placed on your computer, phone or tablet to help identify you as a unique user of the Site and to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the Site and allows us to provide you with a good experience when you access our Site, helps us to improve our Site, and allows us to compile statistical reports on Site visitors and Site activity.
- 13.2. Our software will issue cookies to your system when you access and use the Site and you will be asked to consent to this at the time (e.g. when you first visit our website). Cookies do not affect your privacy and security since a cookie cannot read data off your system or read cookie files created by other sites. You can set your system not to accept cookies if you wish (for example by changing your browser settings so cookies are not accepted), however please note that some of our Site features may not function if you remove cookies from your system.
- 13.3. For further general information about cookies please visit www.aboutcookies.org or www.allaboutcookies.org.

14. Changes to this Policy

- 14.1. We keep this Policy under regular review and may change it from time to time. If we change this Policy we will post the changes on this page, and place notices on other pages of the Site as applicable, so that you may be aware of the Information we collect and how we use it at all times. You are responsible for ensuring that you are aware of the most recent version this Policy as it will apply each time you access the Site.
- 14.2. This Policy was last updated on 19th September 2016.

15. Links to other websites

Our Site may contain links to other websites. This Policy only applies to our Site. If you access links to other websites any Information you provide to them will be subject to the privacy policies of those other websites.

16. Contact us

We welcome your feedback and questions. If you wish to contact us, please contact us at info@low-cost-funeral.co.uk.