

Funeral Plans and Services - Privacy Notice

1. Introduction

Central England Co-operative Limited Funeral Plans Limited (CEC FPL) is committed to ensuring the privacy of colleagues is protected. Should we ask you to provide personal data, then it will only be used in accordance with this Privacy Notice. CEC collects and processes personal data relating to you to manage our employment relationship. We are committed to being transparent about how we collect and use that personal data and to meet our data protection obligations.

Please see Annex 1 to see a full list of all Funeral Homes which are covered by Central England Co-operative Limited Funeral Plans Limited.

2. Who we are

Central England Co-operative Limited Funeral Plans Limited (CEC FPL)

ICO registration: ZB290665

Queen Street

Lichfield

Staffordshire

WS13 6QD

We have appointed a Data Protection Officer (DPO), who can be contacted via the following email address should you have any questions about the way your personal data is handled.

Email: enquiries@centralcoop.co.uk

3. Personal data we collect

Category of personal information	Description
Identity details	First name, middle name(s), surname, membership number
Contact details	Telephone number(s), email address(es), postal address(es), work address(es).
Communication details	Feedback, questions, notes, any data that is contained within a message body or a subject from an individual.
Funeral Plan details	Next of Kin, relationship to next of kin, funeral plan reference, funeral plan payments, any other personal data provided to allow us to make arrangements.
Bank details	Sort code, card number, expiry date, account number, account name, bank branch, transaction date, total monies paid.

Health data	Medical history, mental health details, disability details, all data concerning an individual's health.
--------------------	---

4. How we collect your personal data

We will collect your personal data directly from you in the following ways:

- When you visit our website;
- When you consent to cookies on our website;
- When you correspond with us via email, text, telephone, social media or post.
- When you purchase a funeral plan from us;
- When you engage with us for a at need funeral service;
- When you make a card payment in one of our Funeral Homes;
- When you are captured on our CCTV systems;
- When you sign up to our Guest Wi-Fi;
- When you enter any competitions or prize draws with us; and
- When you consent to receive marketing from us.

5. Why do we process your personal data?

We are only allowed to process your personal data if we have a lawful basis to do so and are required to inform you of what that lawful basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the lawful basis on which we rely on when we process your personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal data	Lawful basis for processing	Legitimate Interests (if applicable)
To process card payments that you make at a funeral home.	• Identity • Bank details	• Performance of a contract • Legal Obligation	N/A
To process and deliver a funeral plan or service to you as a member or customer, including the management of payments and collect money owed to us.	• Identity • Contact • Funeral plan data • Health • Communications	• Performance of a contract • Legal Obligation	N/A
For the storage of your funeral plan or service with us in a dedicated Funeral Management System.	• Identity • Contact • Funeral plan data • Communications	• Legitimate Interests	To use a bespoke system to efficiently store your data.
To complete statutory paperwork relating to the funeral services we	• Identity • Funeral plan data • Contact	• Legal Obligation	N/A

provide.			
To send you offers, vouchers and information about products and services.	• Identity • Contact	• Consent	N/A
To administer any prize draws or competitions that you have entered.	• Identity • Contact	• Consent	N/A
To communicate with your enquires, complaints and compliments.	• Identity • Contact • Communication	• Legitimate Interests	To manage your relationship with us and further improve our services.
To record health and safety incidents that in our funeral homes.	• Identity • Contact • Health	• Legal Obligation	N/A
To capture your image on our CCTV systems including body worn cameras, facial recognition and number plate registration.	• Identity	• Legitimate Interests	For your safety and for the prevention and detection of crime.
To confirm your identity when you visit one of our funeral homes.	• Identity	• Legitimate interests	To keep a record of attendees visiting loved ones.
To conduct surveys and provide you an opportunity to give us feedback.	• Identity • Contact • Free notes	• Legitimate Interests	To gather feedback from customers and support the improvement of our services.
To facilitate the creation of bespoke funeral jewellery and gifts	• Identity • Contact • Funeral plan data	• Performance of a Contract	N/A
To have Funeral Orders of Services created on your behalf.	• Identity • Free Notes	• Performance of a Contract	N/A
To deploy non-essential cookies onto your device when you visit our website.	• Technical	• Consent	N/A
To use anonymous data analytics to improve our website, products, services, marketing and experiences.	• Technical	• Legitimate interests	To continue to improve our services.

--	--	--	--

6. Disclosures Of Your Personal Data

We may have to share your personal data with third parties for the purposes set out in the table above. In order to administer our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- To administer card payments made in Funeral Homes;
- To offer services provided by third party suppliers for the facilitation of our funeral services such as stonemasons, will and probate services, bespoke jewelry services and Order of Services;
- To make a booking with a crematorium;
- To manage your data on a dedicated Funeral management system;
- For debt recovery services for overdue payments;
- Our mail service provider to send you offers and vouchers;
- To facilitate surveys for customer feedback;
- To provide analytical services;
- For the administration of IT management and support;
- To receive IT administration services, including CCTV systems
- We may share your personal data, where necessary, with our auditors, legal advisors and other professional advisors acting in their professional capacity, for instance, for the purposes of allowing us to exercise or defend our legal rights.
- To manage and store your personal data; and
- To meet legal obligations, for example, for the purposes of national security, auditing, taxation and criminal investigations.

If requested, we will share your personal data with authorities such as:

- The Police;
- The Financial Conduct Authority;
- The Health and Safety Executive;
- Local Authorities;
- Her Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of data.

7. International Transfers

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we must rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.
- **Standard Contractual Clauses (with the IDTA Addendum):** The recipient of your personal data has provided us with signed Standard Contractual Clauses with the IDTA Addendum include. This holds the recipient accountable to safeguard the personal data.
- **International Data Transfer Agreement (IDTA):** The recipient of your personal data has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal data.

Instances where your personal data is transferred outside of the EEA are as follows:

Purpose of Processing	Personal data processed	Third Party	Location of data processing	International Safeguard
Administration of the Funeral Management System	- Identity data - Contact data - Funeral plan data - Communications data - Health data	Firehawk Funerals Ltd	Australia	International Data Transfer Agreement (IDTA)

8. How do we protect your personal data?

We take the security of your personal data seriously. We have internal policies and controls in place to ensure that we have implemented measures to ensure that your data is not lost, accidentally destroyed, misused, or disclosed without our authority, and is not accessed except by our colleagues only in the performance of their professional duties.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are operating under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

9. Retention of your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes of our processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;
- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

10. Your Rights

All individuals who engage with us have data subject rights relating to the processing of their personal data. These are the rights that apply to your personal data held within CEC:

- **The right to be informed** – you have the right to know what information we hold and process about you which is why we have provided this Privacy Notice.
- **The right of access** – you have the right to ask for a copy of the information we hold regarding yourself.
- **The right to rectification** – you have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.
- **The right of erasure** – you have the right to have your personal data ‘erased’ in the following situations:
 - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
 - Where the processing was based on consent and you have withdrawn your consent;
 - When the personal data was unlawfully processed; and

- When the personal data has to be erased in order to comply with a legal obligation.

We will erase your records when one of the above situations apply.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:
 - The purpose of the processing activity is direct marketing;
 - Where the processing is based on legitimate interests; and
 - Processing for the purposes of scientific/historical research and statistics.
- **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data in certain situations such as:
 - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
 - When processing is unlawful, and you oppose erasure and request restriction instead; and
 - Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.
- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.
- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

If you would like to exercise any of these rights, please contact us at enquiries@centralcoop.co.uk

11. Changes to this Privacy Notice

We may update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions in relation to this notice, please contact our DPO at enquiries@centralcoop.co.uk

12. Not happy?

Please let us know if you are unhappy with how we have used your personal data by contacting our DPO.

As stated in The Data (Use & Access) Act 2025, you have the right to lodge a data protection complaint with us, should you be unhappy with the way we have processed your personal data.

Your complaint will be managed and responded to by our Data Protection Officer (DPO). Their role will be to conduct an independent investigation into the grounds for your complaint and provide an outcome to you. Your complaint will be responded to with a final written response within 30 days of receipt.

Should you wish to make a data protection complaint, this can be done by contacting the DPO in the following ways:

Email: enquiries@centralcoop.co.uk

If you are dissatisfied with how your data protection complaint has been managed, you also have the right to lodge a complaint with The Information Commissioner's Office (ICO). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

You can find their contact details below:

Address: Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Telephone: 0303 123 1113

Annex 1

This privacy notice applies to all Central England Co-operative funeral businesses, usually trading as Co-operative Funeralcare, although you may know others by their trading names. These include Bretby Crematorium, Terry Smiths Ltd and Co-operative Memorials, as well as our funeral homes:

- Abbey Oak Funeral Services
- A Coley and Son Funeral Directors
- A E Grice Funeral Service
- Ambler Brothers Funeral Directors
- Asian Funeral Company
- A Storer and Sons Funeral Service
- Dennis Easton Funeral Services
- Dove Funeral Service
- Edward Jarvis Funeral Directors
- Fishers Funeral Service
- Forrester Brothers Funeral Directors
- George Crump and Son Funeral Directors
- George James and Son Funeral Service
- Harvey Brothers Funeral Directors
- H E Bull & Son Funeral Service
- J H Grice Funeral Service
- J H Landin & Son Funeral Directors
- J R Norris Funeral Service
- McCartneys Funeral Service
- M J Claypole Funeral Directors
- N Wheatley and Sons
- Richard Barnes Funeral Director
- R J Scholes Funeral Service
- Stephanie J Mason Funeral Directors
- Swanns Funeral Service
- Towers and Son Funeral Service
- Ward and Brewin Funeral Service
- W B Bradford Funeral Service
- Wellings Funeral Service
- Wilf Smith & Son Funeral Directors