

# Privacy Policy

## Who we are

We are A Galla Funeral Directors Ltd (“us”, “we”). Our registered office is at 3 The Pavement Popes Lane, London, W5 4NG. For the purposes of applicable data protection and privacy laws, we are considered the “Data Controller” in respect of the Personal Data that we collect, use and manage in accordance with this Privacy Policy (“**Policy**”).

If you arrive at this page via the website of one of our partner funeral homes then we are the Data Controller and we will collect, use and manage the Personal Data that the partner funeral home collects on our behalf in accordance with this Policy.

## Protecting your rights and interests

Protecting your privacy is important to A Galla Funeral Directors Ltd. We are committed to protecting all Personal Data provided to A Galla Funeral Directors Ltd throughout its network of businesses, whether by individuals with whom we do business, visitors to and users of our websites or otherwise. Personal Data is information which relates to an identified or identifiable living individual.

This Policy explains what Personal Data we collect, how we may use and manage it and the rights you have in relation to your Personal Data. Before you provide us with any Personal Data or browse our website, please read through this Policy in full and make sure that you are comfortable with our privacy practices.

Our website may contain links to other organisations or other service provider websites. These third-party sites are not subject to this Policy and we recommend that you check the privacy and security policies of each website that you visit. We are only responsible for the privacy and security of the data that we collect and we have no control over the actions of any third parties in relation to your data.

Please refer to the Glossary section below for an explanation of the important terms in this Policy.

## The Personal Data we collect

A Galla Funeral Directors Ltd collects Personal Data from a range of individuals in the context of its business activities, including:

- customers;
- suppliers, contractors, and other business contacts;
- users of our websites;
- individuals who contact us by any means;
- our employees and those who are working with us on our behalf;
- our job applicants

## How we collect your Personal Data

We obtain Personal Data when you knowingly and voluntarily disclose this to us, both in an online and offline context. We collect Personal Data when you:

- visit our website and / or complete one of our web forms (e.g. to contact us);
- contact our funeral homes (e.g. to arrange a funeral, arrange memorial masonry with us, engage with us about a funeral pre-payment plan);

- contact a support office or request information from us in any other way;
- visit one of our premises;
- submit a pre-need (Choice) funeral plan;
- make an enquiry to us;
- communicate with us via social networking websites, third party apps or similar technologies;
- visit one of our trade displays at an exhibition or local community event;
- participate in competitions ran by us, for example, prize draws.

Where you provide us with Personal Data about someone other than yourself (e.g. a next of kin or family member on whose behalf you are arranging a funeral plan), you must obtain their freely given, informed consent before doing so. We may also collect information received by us from third party sources, for example relating to your use of other websites which we operate and from related third parties such as sub-contractors.

### **What Personal Data we collect**

A Galla Funeral Directors Ltd may collect a range of Personal Data from you, such as your name, gender, email address, home address and other contact details including phone and/or mobile phone details, details of your employment or business and other interests, communications with you (including notes from arrangement meetings) and financial and payment information. We may also collect Personal Data that may reveal race or ethnic origin, religious or philosophical beliefs, but only where you choose to give this to us, for example, in pre-need funeral plan forms.

When you use our website, we collect certain standard information that is sent by your browser to our website. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting and location, access times and any referring website addresses.

### **The purposes for which we process your Personal Data**

We process your Personal Data for the following purposes:

- to provide you with information, products and services ordered by you (e.g. funeral or masonry arrangements and/or setting up new funeral plans and/or dealing with associated requests);
- to notify you of any changes to the services we are providing you;
- to inform you of our community work;
- to provide you with information in relation to similar goods and services that may be of interest to you. These could include local Christmas/memorial services, other community events that we may arrange or memorial masonry products;
- to communicate with you and third-party contacts;
- to manage and build community relations;
- to administer our websites and help improve our products and services;
- to understand the success of our advertising and different methods of contact with us;
- carry out analytics in relation to the use of our websites;
- to comply with applicable laws and regulations;
- other business-related purposes, including negotiating, concluding and performing contracts, managing accounts and records, supporting corporate social responsibility activities, legal, regulatory and internal investigations and debt administration.

### **The legal basis for A Galla Funeral Directors Ltd processing your Personal Data**

In order to comply with applicable data privacy laws, A Galla Funeral Directors Ltd is required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we

collect and use your Personal Data, as set out above, the legal basis for A Galla Funeral Directors Ltd' processing of your Personal Data will typically be one of the following:

- the performance of a contract that we have in place with you or other individuals;
- A Galla Funeral Directors Ltd' or our third parties' legitimate business interests;
- compliance with our legal obligations;
- your consent.

### **Who we share your Personal Data with**

A Galla Funeral Directors Ltd may share your Personal Data with people within the company who have a "need to know" that data for business or legal reasons, for example, in order to carry out an administrative function such as processing an invoice, or to direct a query that you have submitted to the relevant provider within A Galla Funeral Directors Ltd' network.

We may disclose your Personal Data to third parties including the authorities, A Galla Funeral Directors Ltd' advisors, suppliers who administer and support pre-need (Choice) funeral plans, IT service providers and third parties engaged by A Galla Funeral Directors Ltd for the purpose of providing services requested by you e.g. out of hours contact centres, ministers, civil celebrants, florists, online memorial providers, crematoria, burial service providers, market research providers who assist us in generating reviews of our products and services, to protect any intellectual property rights in any materials displayed on or otherwise available from A Galla Funeral Directors Ltd' websites, for the purposes of seeking legal or other professional advice, to respond to a legal request or comply with a legal obligation, and to enforce A Galla Funeral Directors Ltd' websites Terms and Conditions of Use.

We may disclose your Personal Data to third parties in the event that we sell, buy or merge any business or assets, including to the prospective seller or buyer of such business or assets. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy notice.

We may decide to allow users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-Personal Data with other third parties that are not described above. When we do so we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means that we combine the non-Personal Data of numerous people together so that the data does not relate to any one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

We work with partners and use service providers based around the world. As a result, your personal data may be processed in countries outside of the UK and European Economic Area (EEA). If we transfer personal data outside the UK or EEA we will, as required by applicable law, ensure that your data protection rights are adequately protected by appropriate safeguards. Please contact us if you would like more information about these safeguards.

### **Security**

A Galla Funeral Directors Ltd takes all reasonable technical and organisational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss and unauthorised access, destruction, misuse, modification or disclosure. 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.

## **Records retention**

Your Personal Data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept for varies depending upon the type of Personal Data they contain.

## **Your choices and rights**

You have a number of rights in respect of your Personal Data and you can make a number of choices. If you wish to:

- request a copy of the Personal Data that we hold about you;
  - request that we rectify, delete, or limit the processing of your Personal Data,
- please submit your written request to the Data Protection Compliance Officer at A Galla Funeral Directors Ltd who can be contacted via email at [office@gallafd.com](mailto:office@gallafd.com).

We try to respond to all legitimate requests within one month from receipt of the request. 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.

If you decide that you do not want to receive communications from us, whether by email, telephone or post, you can “opt-out” from receiving such communications by responding to us either by replying to the email that you have received or by contacting the sender by telephone or post.

## **Questions and complaints**

If you have a concern or complaint about how A Galla Funeral Directors Ltd has used your Personal Data, as a first step, you should raise this in writing with A Galla Funeral Directors Ltd by contacting us at the following address: A Galla Funeral Directors Ltd 3 The Pavement Popes Lane, London, W5 4NG

Alternatively, you can contact the Data Protection Compliance Officer via email at [office@gallafd.com](mailto:office@gallafd.com). If you are not satisfied with the handling of your concern or complaint by A Galla Funeral Directors Ltd, you can escalate this to your national Data Protection Authority. In the United Kingdom, this is the Information Commissioner’s Office.

## **Changes to this Policy**

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our websites. It is your responsibility to review the Policy every time you submit information to us or purchase a service.

## **Access**

A hard copy of this Privacy Policy can be obtained by writing to: A Galla Funeral Directors Ltd 3 The Pavement Popes Lane, London, W5 4NG Alternatively, please email [office@gallagfd.com](mailto:office@gallagfd.com).

## **Cookies**

Our websites use cookies. A “cookie” is a small file of letters and numbers that is sent to your computer by a website and automatically saved on your computer by your web browser (e.g. “Internet Explorer”). Each time you request a page from the website, your web browser sends this cookie back to the website server.

The cookies we use are “analytical cookies” sent by Google Analytics. They allow us to recognise and count the number of visitors and to recognise and track which parts of our websites you visit when you are using our websites. This helps us to improve the way our website works, for example by making sure visitors are finding what they need easily.

We may also use the information collected from our use of cookies to estimate our audience size, analyse trends and general usage patterns of our websites, optimise our websites, and for other research and marketing purposes. This is statistical information and does not identify any individual.

**An overview of Google Analytics is available [here](#)**

You are not obliged to accept cookies. If you wish, you can set your browser to notify you before you receive a cookie so you have the chance to accept it and you can also set your browser to refuse to receive or send all cookies. The website [www.allaboutcookies.org](http://www.allaboutcookies.org) (run by the Interactive Marketing Bureau) contains step-by-step guidance on how cookies can be switched off by users.

Google Analytics also uses web beacons (also known as web bugs). A “web beacon” is a clear picture file which keeps track of your navigation through the website. Turning off the website’s cookies as detailed above will prevent web beacons from tracking your specific activity. The web beacon may still record an anonymous visit from your IP address but unique information will not be recorded.

Additionally, the Google Analytics cookie may be used to enable remarketing. Remarketing works by targeting previous site visitors when they visit Google search again in the future, using search ads.

In both cases, a user’s anonymised cookie can be used to identify users (anonymously) who did or did not complete an action on the site, such as contacting one of our direct, and retarget them with the intention of encouraging a repeat visit to the site. You are free to opt out of this type of cookie use by visiting Google’s Ad Settings at [google.com/settings/ads](http://google.com/settings/ads).

If you wish to opt out of being tracked by Google Analytics across all websites you can visit <http://tools.google.com/dlpage/gaoptout> and download the Google Analytics Opt-out Browser Add-on.

By using our websites without disabling cookies you are consenting to our use of cookies and web beacons as described in this policy. Please note that turning off cookies will restrict your use of the website.

**Social media features**

A Galla Funeral Directors Ltd’ websites may include social media features, such as sharing or following buttons. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly.

Social media features are either hosted by a third party or hosted directly on our websites. This Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

**Glossary**

**Data Controller**

A party that determines the purposes and means of data processing.

**Data Protection Authority**

The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of A Galla Funeral Directors Ltd.

**European Economic Area (EEA)**

The EEA includes all European Union member states and Iceland, Liechtenstein and Norway.

#### Personal Data

Information which relates to an identified or identifiable individual (e.g. data about A Galla Funeral Directors Ltd employees, casual workers, agents, contractors, applicants, employees of vendors and suppliers, contractors, business contacts, customers/clients using our products and services and individuals who use our websites or service centres). It includes names, addresses, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.

#### Processing

Doing anything with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.