

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

*Definitions of data subjects covered by this Privacy Notice:*

- Funeral Director – The individual directors of the funeral business.
- Clients - The individuals who have signed up to a pre-paid funeral plan with the Funeral Director

CPS Ventures Ltd T/A CPS Trust Consultancy may be referred to throughout this document as 'we', 'us' or 'our'.

## 2. Responsibilities

- 2.1 The Data Protection Officer (DPO) is responsible for ensuring that this notice is made available to data subjects prior to CPS Ventures Ltd T/A CPS Trust Consultancy collecting/processing their personal data.
- 2.2 All Trust People Ltd Employees, Staff and Consultants acting on behalf of CPS Ventures Ltd T/A CPS Trust Consultancy who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Introduction

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we will store and process that data, and how we will keep it safe.

We appreciate that there's a lot of information to take in here, but we want to make sure that you're fully informed about your rights, and how CPS Ventures Ltd T/A CPS Trust Consultancy (Data Protection Number ZA312564)

We hope this notice covers what you'd like to know, if not, please get in touch with us at:

Telephone: 03330 143 445

Email: [info@yourowntrust.co.uk](mailto:info@yourowntrust.co.uk)

Website: [www.yourowntrust.co.uk](http://www.yourowntrust.co.uk)

Address: CPS Ventures Ltd T/A CPS Trust Consultancy, Bollin House, Bollin Link, Wilmslow, SK9 1DP

It's likely that we will need to update our Privacy Notice occasionally. We will email you if there's any important changes.

### 3.2 Who are we

CPS Ventures Ltd T/A CPS Trust Consultancy act as Consultants for discretionary trusts including those set-up for Funeral Directors to administer their own Prepaid Funeral Plan Scheme.

### 3.3 What is personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

### 3.4 What are the legal bases we rely on

The law on data protection sets out several different reasons for which we can collect and process your personal data. These include;

#### Consent

In certain situations, we can collect and process data with your explicit separate consent. ***We will never market directly to 'Clients'.***

For example, as a Funeral Director, when you first partner with us, we will ask you to decide which types of marketing communications you would like to receive from us, e.g. newsletter. When collecting your personal data e.g. email address, name, company name, we will always make clear to you which data is necessary in connection with your service.

#### Legitimate interest

We will need to collect and process your personal data to comply with our contractual obligations to you. The type of essential data we need to collect from you will depend on whether you are a Client or a Funeral Director and includes;

<b>Personal data type: Funeral Directors</b>
<ul style="list-style-type: none"><li>• Company name</li><li>• Full names</li><li>• Addresses</li><li>• Date of Birth</li><li>• Company Bank details</li><li>• Telephone &amp; Mobile Numbers</li><li>• Email Address</li><li>• NI Number</li><li>• Identification documents such as a passport or driving licence</li></ul>

<b>Personal data type: Clients</b>
<ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Telephone number</li><li>• Mobile number</li><li>• Email address</li><li>• Date of birth</li><li>• Gender</li><li>• Next of kin (including all preceding data types above)</li><li>• Representative of plan holder (including all preceding data types above except Next of Kin)</li><li>• Bank details</li></ul>



### **Legal compliance**

If the law requires us to, we may need to collect and process your data.

For example, we can pass on your details if required by the Trust Actuary, Accountants, Solicitors, the Bank, HMRC or the Independent Trustees (as outlined in your individual agreement).

### **3.5 When do we collect your personal data**

#### **Funeral Directors**

- When you visit our website and choose to complete/submit an online form with your details e.g. Request a Callback, Email Us.
- When you ask one of our sales consultants to email you information about a product or service.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you choose to complete any surveys we send you.
- We collect data from publicly available sources when you've given your consent to share information or where the information is made public as a matter of law.

#### **Clients**

- The personal data, as shown in the table above, will possibly in some instances be passed to us by your Funeral Director when you join sign up to a pre paid funeral plan.
- We will never have direct contact with you to collect any personal data or have any correspondence unless there is a legal requirement to due so as Trustees in the unlikely event of needing to pay funds to you directly.

### **3.6 Here's how we will use your personal data and why**

We will process (collect, store and use) your data in a manner compatible with the EU's General Data Protection Regulation (GDPR).

We will endeavor to keep your information accurate and up to date and will not keep it for longer than is legally necessary.

We want to deliver the best possible customer experience. In order to do this, we only request the information that's essential to either working with you as a Funeral Director partner or as a Client signing up to a pre paid funeral plan.

### **Funeral Directors Only**

We will use your personal data to be able to conduct our contractual business, answer your queries, send you legitimate emails such as opening hours, and complaints. Processing the information you send us means we can respond quickly and professionally. We will also keep a record of these to inform any communication in the future with us and to be able to show how we communicated with you at that time. We will do this on the basis of our legal obligations and our legitimate interests in providing you with the best possible service and for service level improvement.

We are 100% focused on ensuring that the information we collect from you and use is appropriate for the purposes of the service we provide and does not constitute an invasion of your privacy.

### **3.7 How we protect your personal data**

We know how important data security is to all our customers. We are committed to treating and processing your data with absolute care and have put in place all the necessary steps, policies, procedures and training, as guided by the ICO, to protect it.

### **3.8 How long do we keep your personal data**

We will process your personal data for the duration of your contract with us and will store the personal data for the legally required time period.

We are required to retain information in accordance with the law, such as information needed for income tax and audit purposes.

### **3.9 Who do we share your personal data with**

Whether you are a Funeral Director or Client, we will not pass on your personal data to third parties without first obtaining your consent.

However, trusted third parties may receive your personal data as part of our processing activities with legitimate consent or legal compliance.

They can only use your data for the specific purposes detailed in our contract with them.

We work closely with all our partners to ensure that your privacy is always respected and protected.

### 3.10 What are your rights regarding your personal data

The GDPR provides the following rights for you as an individual (data subject):

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that's inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that CPS Ventures Ltd T/A CPS Trust Consultancy refuses your request under rights of access, We will provide you with a reason as to why. You have the right to complain to the supervising authority (ICO).

If you wish to exercise these rights please contact us as follows:

Telephone: 03330 143 445

Email: [info@yourowntrust.co.uk](mailto:info@yourowntrust.co.uk)

Website: [www.yourowntrust.co.uk](http://www.yourowntrust.co.uk)

Address: CPS Ventures Ltd T/A CPS Trust Consultancy, Bollin House, Bollin Link, Wilmslow, SK9 1DP

In circumstances where we are processing your personal data on the basis of our legitimate interest to you, you can ask us to stop for reasons connected to your personal situation.

We will then always do so unless we believe there's a legitimate overriding reason to continue processing your personal data.

If we decide not to action your data request We will fully explain the reasons to you for our decision.

To protect your confidential information, We will always request that you verify your identity before continuing with any request you make under this Privacy Notice.

### **3.11 How do I stop receiving marketing emails such as newsletters – Funeral Directors**

- Simply click the unsubscribe link in any email that we send you and it will automatically unsubscribe you from our marketing list.
- Email [info@yourowntrust.co.uk](mailto:info@yourowntrust.co.uk) and say you'd like us to stop sending marketing emails.
- Write to The Data Protection Officer, CPS Ventures Ltd T/A CPS Trust Consultancy, Bollin House, Bollin Link, Wilmslow, Cheshire, SK9 1DP. Please forgive us if you continue to receive communications for a short time after unsubscribing as some communications may have already been scheduled electronically.
- Telephone: 08000 197133

### **3.12 Our use of IP addresses and cookies on our website**

Website: [www.yourowntrust.co.uk](http://www.yourowntrust.co.uk)

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to analyse aggregate information. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise our site according to user needs.
- To speed up your searches.
- To recognise you when you return to our site.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### **3.13 Contacting the Regulator**

If you wish to make a complaint about how your personal data is being processed by us, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority (ICO) and CPS Ventures Ltd T/A CPS Trust Consultancy's DPO.

You can contact the Information Commissioner's Office (ICO) by phoning 0303 123 1113 or go to their website at [www.ico.org.uk](http://www.ico.org.uk)

### 3.14 **Complaints**

If you wish to make a complaint about how your personal data is being processed by us or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority our Data Protection Officer (DPO).

Please write to The Data Protection Officer, CPS Ventures Ltd T/A CPS Trust Consultancy, Bollin House, Bollin Link, Wilmslow, Cheshire, SK9 1DP or email [info@yourowntrust.co.uk](mailto:info@yourowntrust.co.uk)