

Westerleigh Group Privacy Policy Statement



Who we are

This Privacy Policy sets out what we will do with your information and the arrangements in place to keep that information private and safe. It also explains your rights, for example, how you can obtain a copy of the information we hold about you.

This website is not intended for children, and we do not knowingly collect data relating to children. This Privacy Policy supplements any other privacy or fair processing notice that we may provide when collecting or processing data in support of your use of this website.

When we use 'we', 'our', or 'us' in this policy, we mean one or more of the Westerleigh Group companies, trading as Westerleigh Group, as listed below:

- Westerleigh Group Limited (ZA403333): a provider of high-quality crematorium and cemetery services throughout the United Kingdom.
- A. K. Lander Limited (ZA408548): An established supplier of memorials and related masonry work across the UK.

Each of these companies act as Data Controllers.

If you have any questions or comments regarding this privacy notice, or if you're not happy with the way we use your information, please contact us using the following details:

- **Post:** Group Data Protection Officer, Westerleigh Group, Chapel View, Westerleigh Road, Westerleigh, Bristol, BS37 8QP.
- **Email:** DPO@westerleighgroup.co.uk

Our Data Promise

We are committed to respecting and protecting your data, here is our promise to you:

- We promise to be open and honest with you about how your data is used.
- We promise never to sell your data.
- We promise to make it easy for you to access and correct your data.
- We promise to only contact you about the things we think will be of interest to you – if you've ever had enough, just tell us and we'll stop.
- We promise to have effective protection in place to keep your data safe and secure.

Westerleigh Group Privacy Policy Statement



When do we obtain information about you?

We collect information about you when you enquire about or make an application for a product or service promoted by Westerleigh Group. We also collect information if you make changes to your product or service, make a claim on a product, or update your personal information.

We collect information about you if you are named by the product owner during an application for a product or service. We collect information when you complete customer surveys, provide feedback, subscribe to newsletters, or participate in our competitions and promotions.

When you visit us online, we collect information about you using 'Cookies'. A Cookie is a small text file that is stored on your computer or device when you visit a website.

What information do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The information we collect about you varies depending on the reason for the interaction but may include:

- **Identity:** such as first name, last name, and gender.
- **Contact:** such as company name, home address, email address and telephone numbers.
- **Special Category:** includes race or ethnicity, religious beliefs and specific data about your health that is required to ensure we provide you with appropriate information about our products and services.
- **Financial:** includes bank account and payment card details.
- **Transactional:** includes details of payments to and from you, and details of products and services you've purchased from us.
- **Technical:** may include internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile:** may include your username or similar identifier and password, your purchases or orders made, your interests, preferences, feedback, and survey responses.
- **Usage:** includes information about how you use our website, products, and services.
- **Marketing:** includes your communication preferences when receiving marketing communications from us or carefully selected third parties.
- **Communications:** includes all communications we have with you whether by email, post, phone or otherwise.
- **CCTV or surveillance systems:** includes any devices or systems designed to capture, record or monitor images of individuals or information relating to individuals.

Westerleigh Group Privacy Policy Statement



What information do we collect about you? (continued)

We **do not** collect data about your political opinions, trade union membership, sexual orientation, criminal convictions, or offences.

We may collect, use, and share **aggregated data or anonymised information** (such as statistical, demographic or website usage data) within and outside of the Westerleigh Group with relevant partners e.g., research groups and advertisers. You won't be able to be identified from this information.

We may supplement the data we collect about you with information we obtain from carefully selected third parties. This may include collecting personal data about you from funeral directors or permit applications for memorial masons. Before we use this information, we ensure that the third party is permitted to share this information with us.

Your data is not subject to automated decision-making including profiling.

How will we use the information we collect?

We will use the information we collect about you in the following ways:

- To respond to an enquiry or provide you with product information.
- To provide you with the requested product and administer that product.
- To provide you with one of our services and to ensure that we maintain that service appropriately.
- To notify you about important changes or developments to the features and operation of products and services.
- To carry out market and brand research and analysis.
- To develop, test the performance of and manage our brands, products, services, and internal processes.
- To develop new products, services, and propositions.
- To inform you about products, services, offers, competitions, and promotions.
- To administer offers, competitions, and promotions.
- To show you selected content and advertisements via social media (for example, using Facebook Custom Audiences and Google Custom Match). You can use the preference settings of the social media provider to manage how and if these appear.
- To develop and test the effectiveness of marketing activities.
- To deter and/or detect criminal acts against individuals, buildings and assets and provide evidence to the Police or other authority for the purposes of investigation and/or prosecution of crimes.
- To support and promote a robust Health and Safety culture.
- To assist and promote effective risk management at all Westerleigh Group sites.

Westerleigh Group Privacy Policy Statement



How will we use the information we collect? (continued)

We are required by law to have a specific reason for collecting and using your personal data:

- We rely on the contract between us when providing products and/or services.
- In certain circumstances, we have a legal obligation to disclose your personal information to a third party, for example, with statutory registers for cremation and burial.
- Provided your fundamental rights are not overridden to pursue our legitimate interest, for example, to conduct market and brand research, undertake product, service and proposition development and some forms of direct marketing.
- We rely on consent when using your information for direct marketing activities by post, telephone, text, and email. We also rely on consent when processing categories of data such as health information and religious beliefs.

Who might we share your information with and why?

We might share your information with third parties in certain circumstances including those listed below:

- The companies trading as Westerleigh Group, listed in the 'Who we are' section of this Privacy Policy, to keep your information up to date and for direct marketing purposes.
- The provider of the product you have purchased, to enable them to fulfil their contract with you.
- The provider of a product purchased on your behalf by Westerleigh Group, to enable us to fulfil our contract with you.
- Carefully selected third parties to deliver our services to you, such as, funeral directors or officiants, ministers, churches, or memorial masonry specialists etc.
- Specialist providers of market research, statistical analysis, and customer profiling to help us improve our processes, products, and services.
- Providers of our IT systems and associated support services to ensure they continue to operate effectively.
- Law enforcement agencies, financial services organisations, and industry bodies to aid fraud prevention.
- Providers of printing and mailing services to produce and issue statements or other correspondence necessary to ensure you are kept suitably informed.
- Specialist media providers, to manage your preferences for receiving direct marketing.
- Auditors and regulatory bodies, as part of their oversight of our activities.

Westerleigh Group Privacy Policy Statement



What precautions do we take to protect your information?

We take appropriate technical and organisational measures to prevent the loss, misuse, or alteration of your personal information.

If personal information is processed outside of the UK, we will ensure that adequate safeguards are in place to protect data, such as, appropriate contractual arrangements and assurances. Assurances may include recognised certification schemes, such as, the US Privacy Shield.

In the event of a personal data breach, we will notify you and the Information Commissioner's Office (ICO) if we are legally required to do so, or there is a risk to your rights and freedoms because of the breach.

How long do we keep hold of your information?

We will retain a record of your personal information for as long as you hold a product or use a service provided by us.

We will also retain that information for a period of time after you cease holding a product or using a service to ensure we are able to comply with applicable regulatory and legal requirements.

Due to the nature of our products and services, this typically means that we will retain records of your personal information for six years, following fulfilment of the contract between us.

If you have made an enquiry, but not taken out a product or used one of our services or responded to any direct marketing activity we will retain a record of your personal information for up to two years.

Providing information about someone else

If you provide information to us about someone else, you must have their permission to do so, and have told them about how we will use their personal information.

Other websites

Our website may contain links to third parties. This privacy policy only applies to the companies trading as Westerleigh Group, listed in the 'Who we are' section of this Privacy Policy.

Westerleigh Group Privacy Policy Statement



Your rights

Where you have given consent to use your personal data, you have the right to withdraw that consent at any time by emailing us or calling us. Without your consent, the service we provide may be limited.

You have a right to request a copy of the information we hold about you.

In some specific circumstances you may have the right to request that we provide you with the information we hold about you in an electronic format so that you can transfer it to another provider.

We want to make sure that your personal information is accurate and up to date. You can ask us to correct information that you think is inaccurate.

In certain circumstances, you may have the right to object to us using your personal information, to restrict processing of your information, or to have your information deleted. You also have the right to object to your personal information being used for direct marketing purposes.

For more details or to exercise any of these rights, please contact us:

- **Post:** Group Data Protection Officer, Westerleigh Group, Chapel View, Westerleigh Road, Westerleigh, Bristol, BS37 8QP.
- **Email:** DPO@westerleighgroup.co.uk
- **Telephone:** Customer Services Team on 0117 937 1050

We will provide a response within 30 days, if not sooner. There is normally no charge for exercising any of your rights.

Complaints

If you have any concerns about the way we use your information, you can raise these with us by following our complaints procedure. To find out more [click here](#) or call 0117 937 1050. You also have the right to refer your complaint to the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

Changes to our Privacy Policy

We keep our Privacy Policy under regular review. The most recent update was made in July 2022 and the key changes were as follows:

- To release a brand-new version of the Privacy Policy, which uses simplified and customer focused terminology.
- Update Group DPO details.