# **Kilternan Cemetery Park**

# **Privacy Statement**

# **Opening Statement**

Kilternan Cemetery Park fully respects your right to privacy and we are committed to ensuring that your privacy is protected. Whether you deal with Kilternan Cemetery Park as a purchaser, vendor, supplier, buyer, agent, or otherwise, you are entitled to the protection of your personal information. This data may relate to your name, telephone number, email address or any other information relating to you.

Please read the following privacy statement to learn more about how we collect, store, use and disclose information about you when you interact with Kilternan Cemetery Park. This Policy applies to all your Personal Data collected by (or on behalf of) Kilternan Cemetery Park.

**What does this Privacy Statement cover?**

This Privacy Statement covers our treatment of your personal information that we gather when you are interacting with Kilternan Cemetery Park as a purchaser, vendor, supplier, buyer, agent, or otherwise. In the course of our business, we gather various types of information about our clients, suppliers, subcontractors, buyers, agents, etc., including information that identifies you as an individual (“Personal Data”) as explained in more detail below.

**Who is responsible for the processing of your Personal Data?**

For the purpose of the EU General Data Protection Regulation 2016/679 (“GDPR”), the data controller is Kilternan Cemetery Park, Ballycorus Road,Kilternan,Dublin 18.

**Who can you contact if you have Questions or Requests?**

Our Data Protection Representative will handle your questions or requests relating to this Policy or your Personal Data. For any questions or requests or complaints concerning the application of this Policy or to exercise your rights, as described in this Policy, you may contact the Data Protection Representative at:

info@kilternancemetery.ie

**Key Principles**

We value your Personal Data entrusted to us and we are committed to processing your Personal Data in a fair, transparent and secure way. The key principles that Kilternan Cemetery Park applies are as follows:

* **Lawfulness**: we will only collect your Personal Data in a fair, lawful and transparent manner.
* **Data minimisation**: we will limit the collection of your Personal Data to what is directly relevant and necessary for the purposes for which they have been collected.
* **Purpose limitation**: we will only collect your Personal Data for specified, explicit and legitimate purposes and we will not process your Personal Data further in a way incompatible with those purposes.
* **Accuracy**: we will keep your Personal Data accurate and up to date. It is however your responsibility to provide us with accurate and up to date data
* **Data security and protection**: we will implement technical and organisational measures to ensure an appropriate level of data security and protection considering, among others, the nature of your Personal Data to be protected. Such measures provide for the prevention of any unauthorised disclosure or access, accidental or unlawful destruction or accidental loss, or alteration and any other unlawful form of Processing.
* **Access and rectification**: we will process your Personal Data in line with your legal rights.
* **Retention limitation**: we will retain your Personal Data in a manner consistent with the applicable data protection laws and regulations and for no longer than is necessary for the purposes for which it has been collected.
* **Safeguards re third parties**: we will ensure that Personal Data accessed by (and transferred to) third parties is carried out in accordance with applicable law and with appropriate contractual safeguards.
* **Lawfulness of direct marketing and cookies**: if we send you promotional materials or place cookies on your computer, we will ensure that we do so in accordance with applicable law.

# **What information do we collect?**

We receive and store information that you provide directly to us or that has been supplied to us by your funeral director that is necessary in the provision of our services and the creation of burial records

* **Identity Data** including first name, maiden name, last name, identifier, marital status, title, date of birth and gender, date of death, date of burial/interment .
* **Contact Data** including residential address, email address and telephone numbers;
* **Transaction Data** including details about payments to and from you and other details of products and services you have purchased from us.
* **Technical Data** including internet protocol (IP) address, , 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;
* **Usage Data** including information about how you use our website, products and services; and
* **Interaction Data** including email correspondence and hard copy correspondence.

Any information which you provide to us is not made available to any third parties other than as set out herein (Disclosure of Personal Data) without your permission and is used by Kilternan Cemetery Park only in line with the purpose for which you provided it and in accordance with GDPR.

# **How do we use the information?**

We will only process your Personal Data for specified, explicit and legitimate purposes and we will not process your Personal Data further in a way that is incompatible with those purposes.

Such purposes include the recording of plot owner/s and next of kin details

**What is the legal basis for possessing my Personal Data?**

The principal legal basis for this processing is our legitimate interest in the provision of our Cemetery services, In addition, please note that in accordance with applicable data protection law, your Personal Data can be processed if:

* you have given us your consent for the purposes of the Processing. For the avoidance of doubt, you will always have the right to withdraw your consent at any time;
* it is necessary for the performance of a contract to which you are a party; or
* it is required by law.

# **Is my Personal Data secure?**

We use appropriate technical, organisational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration and destruction.  These measures have been designed taking into account our IT infrastructure, the potential impact on your privacy and the costs involved and in accordance with current industry standards and practice.

Your Personal Data will only be processed by a third party data processor if that data processor agrees to comply with those technical and organisational data security measures.

Maintaining data security means protecting the confidentiality, integrity and availability of your Personal Data:

1. **Confidentiality**: we will protect your Personal Data from unwanted disclosure to third parties.
2. **Integrity**: we will protect your Personal Data from being modified by unauthorised third parties.
3. **Availability**: we will ensure that authorized parties are able to access your Personal Data when needed.

Our data security procedures include: access security, backup systems, monitoring, review and maintenance, management of security incidents and continuity, etc.

**How long will we use your Personal Data for?**

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any statutory, legal, accounting, insurance or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

# In some circumstances you can ask us to delete your data: see Right to erasure below for further information. In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

# **Information We Automatically Collect:**

When you visit our Website, we collect certain information related to your device, such as your device’s IP address, referring website, what pages your device visited, and the time that your device visited our Website.

Information collected by cookies and other similar technologies – we use various technologies to collect information which may include saving cookies to users’ computers. For further information, please see the section below headed “Cookies and other Tracking Technologies”.

# **Cookies and other tracking technologies**

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit.

If you want to check or change what types of cookies you accept, this can be altered within your browser settings. Please see our Cookies Policy [include link] for more information.

**Disclosure of Personal Data**

Depending on the purposes for which we collect your Personal Data, we may disclose it to the following categories of recipients, which will then process your Personal Data only for one of the following purposes:

a) Within our organisation:

* Our authorised staff members;

b) Third party business partners:

* Business partners: for example, trusted companies that hold or records and data.
* We require such companies to always act in compliance with applicable laws and this Policy and to maintain confidentiality of your personal information;

c) Other third parties:

* when required by law or as lawfully necessary to protect Kilternan Cemetery Park:
* to comply with the law, requests from authorities, court orders, legal procedures, obligations related to the reporting and filing of information with authorities, etc.;
* to protect the rights, property or safety of Kilternan Cemetery Park and/or its customers;
* to our insurance companies if necessary for a claim.

# **How can I Exercise my Data Subject Rights?**

Under the General Data Protection Regulation, you have the following rights:

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your Personal Data for certain activities, or consent to market to you, you may withdraw your consent at any time.

**Right to Rectification: if your Personal Data that we hold is inaccurate or incomplete, you have the right to request the rectification of your Personal Data.**

**Data Subject Access Requests:** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and to provide you with copies of that information. We will respond to your request within 30 days. At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request; and

- where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

**Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your Personal Data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with the Office of the Data Protection Commissioner.

 **Changing this Policy**

We may need to change this Privacy Statement from time to time. We will alert you to material changes by, for example, placing a notice on our websites and/or by sending you an email (if you have registered your e-mail details with us) when we are required to do so by applicable law. You are responsible for periodically reviewing this Privacy Statement.

This Privacy Statement was most recently updated on 25/05/2018.