

## **Freeman Brothers and J.Gumbrill General Data Protection Policy**

For further information please see our specific policies for clients of a) funerals, b) pre-paid funeral plans, c) monumental masonry; d) our Data Processing Notice for Employees; and e) our Data Protection policy for job applicants

### General Principles

Freeman Brothers is committed to processing data it controls, or processes on behalf of other organisations, in a transparent manner.

Data processing will be for legitimate and specified purposes and only as necessary. Information retained will be accurate, up-to-date and kept no longer than necessary.

Freeman Brothers and J.Gumbrill

- operates a clear desk policy;
- regularly trains staff in their obligations under prevailing legislation and;
- considers data security in all its processing activity.

### Data processing and retention for clients

1. Information pertaining to Deceased people is exempt from Data Protection Regulation
2. Our Data Processing Policy for clients outlines the following principles:
  - a. We will carry out processing activity as necessary in the performance of the contract between ourselves and the client
  - b. We will retain our clients' personal data to demonstrate the performance of the contract for a ten-year period
  - c. We will retain basic personal data indefinitely to meet our legal obligation to be able to provide a contact connected to the Deceased in case of future query e.g. regarding exhumation
  - d. The above storage will be by way of either securely stored hard copy or by retention on our computer system, backed up to a UK-based encrypted server
  - e. We will shred all unnecessary information outside of the above once the funeral arrangements are concluded
  - f. We will delete all electronic communications once the funeral arrangements are concluded
  - g. We will never sell our client data to any other company or pass any details to any third party other than outlined within the policy
  - h. All clients are provided with a copy of this policy

### Data processing and retention for third parties

Information pertaining to third-party contacts such as Ministers, Church Wardens, Organists is:

- a. Only passed on to clients where publicly-available or following explicitly obtained consent
- b. Regularly checked to ensure it is up-to-date
- c. Deleted as soon as we are aware of inaccuracies
- d. Stored on our computer system which is backed up to a UK-based encrypted server

### Data processing and retention for employees

Our Data Processing Notice for Employees outlines the following principles:

- a. Data is stored securely in our offices in hard copy with access limited to managerial staff and shredded when no longer needed

- b. Information is stored electronically with access limited to managerial staff through password protection, on UK-based encrypted server and deleted when no longer required
- c. Basic information will be retained for five years after the end of employment in order to facilitate references- with explicit consent. Ex-employees who do not consent will sign a declaration to evidence understanding of inability to provide references
- d. Information will be retained to meet legal obligations viz. HMRC queries etc. in line with statutory timescales for investigation
- e. Information is passed to a third-party processor for payroll purposes. The contracted provider will provide assurances regarding Data Protection principles
- f. Information will be passed to other third parties under legal obligation e.g. HMRC

#### Data Protection for Job Applicants

Our Data Protection Policy for Job Applicants outlines the following principles:

- a. Applicants' information is only processed for the purposes of contacting them following an application
- b. Unsuccessful applicants' data will be shredded after the vacancy has been fulfilled
- c. Should we wish to retain an unsuccessful applicant's data, we will seek explicit consent and periodically re-establish consent to securely store this data as hard copy with access limited to managerial staff
- d. Unsolicited job applicants are advised that their data will not be retained and advised of how vacancies are advertised. Their information is deleted and/or shredded as soon as this has occurred
- e. References will only be taken up with explicit consent and after a conditional employment offer has been made
- f. We reserve the right to use internet searches to carry out due diligence on candidates in the course of recruitment. We will not retain this information and these searches will be in accordance with our Equal Opportunities obligations.