BRISTOL MEMORIAL WOODLANDS LIMITED PRIVACY POLICY

1. Who we are

This privacy policy is issued by Bristol Memorial Woodlands Limited ("**we**", "**us**" or "**our**"), a company registered in England and Wales with company number 03757061. We are a controller of your personal data and are responsible for ensuring that it is properly protected. We are registered with the Information Commissioner's Office in the UK with reference ZB163904.

Please see the 'How to contact us' section at the end of this privacy policy if you have any questions about this privacy policy or the data we hold about you.

2. This privacy policy

Please read this privacy policy carefully as it contains important information about who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

This privacy policy explains how we collect and process information about you if you are a website visitor, a customer or prospective customer or personnel of a corporate customer, supplier or prospective supplier.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to UK data protection laws.

Our collection and use of your personal data

Personal data means any information about a living individual from which they can be identified, whether directly or indirectly. It does not include anonymised data, which is data that can no longer be associated with a particular individual.

Due to the nature of our business we also collect information about deceased individuals. Information about deceased individuals does not constitute personal data under UK data protection laws and therefore this privacy policy only describes our processing of information about living individuals.

How your personal data is collected

We collect personal data about you in different ways, including:

- **Direct interactions.** You may give us your personal data when you access our website, register with us, sign up as a customer, contact us, send us feedback, complete a survey or make a purchase with us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data (defined below) about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties.** We may receive personal data about you from a relative contacting us on your behalf. We may also receive Identity Data and Contact Data (defined below) from a third party bank or law firm that is contacting us on behalf of an estate, where you are involved in organising burial arrangements.

Personal data we collect about you

The personal data we collect about you depends on how and why you engage with us. We may collect and use the following data about you:

- **Identity Data** - full name, title, date of birth and gender.

- **Contact Data** – residential or postal address, email address and telephone number(s).
- **Financial Data** - bank account and payment card details (processed by our secure third party payment processor).
- **Transaction Data** - details about payments made by you.
- **Technical Data** - 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 Data** – details of orders placed by you including plot details, your interests and preferences.
- **Usage Data** - data about how you use our website or our services, including survey responses you may provide.
- **Marketing and Communications Data** - your preferences in receiving marketing from us and your communication preferences.

We may also collect the following **Special Categories of Personal Data** about you:

- **Religious or Philosophical Belief Data** (if you choose to share this with us)

We do not routinely collect any other Special Categories of Personal Data (this includes details about your race or ethnicity, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal conviction and offences.

We need some of this personal data to provide you with our services. If you do not provide personal data that we ask for, it may delay or prevent us from providing our services to you.

Our website is not intended for use by **children** and we do not contract with children. We will only process personal data relating to children in limited circumstances, for example if a relative contacts us about a child.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for a range of purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as it does not include information that can directly or indirectly identify you. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or your postcode to analyse which parts of the country our customers are from.

<u>How and why we use your personal data</u>

Under data protection law, we can only use your personal data if we have a lawful basis for doing so, which includes:

- **Contract:** where our use of your personal data is necessary to perform a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legitimate interests**: where our use of your personal data is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your privacy rights and freedoms which override our legitimate interests). These legitimate interests can include business interests, individual interests or broader societal benefits.

- **Legal obligation:** where our use of your personal data is necessary for us to comply with the law.
- **Consent:** where you have given us clear consent for us to process your personal data for a specific purpose.

The table below explains what we use your personal data for and why, as well as what our legitimate interests are where we are relying on our legitimate interests as the lawful basis to process your personal data:

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you or your organisation as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you. (b) Necessary for ours and a third party's legitimate interests (to set up and manage our customer relationships)
To provide our services to you, including: (a) to manage payments, fees and charges (b) to collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us and to provide our services to our paying customers)
To allocate you an appropriate plot or burial	Religious or Philosophical Belief Data	Explicit consent, where you have chosen to share this data with us
To manage our relationship with you which will include: (a) notifying you about changes to our services, terms or privacy policy (b) asking you to leave a review or take a survey (c) responding to queries you may raise	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to manage our customer and supplier relationships, keep our records updated and to study how customers use our products and/or services)
To record telephone calls that we receive	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to train our personnel and monitor calls for quality assurance purposes)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context

maintenance, support, reporting and hosting of data)		of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and marketing materials to you and measure or understand the effectiveness of the marketing we send to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Consent OR (b) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) OR (b) Consent, having obtained your prior consent to non-essential cookies
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our services and grow our business) OR (b) Consent, having obtained your prior consent to receiving direct marketing communications

3. Who we share your personal data with

We may share your personal data with the third parties set out below for the purposes listed in the above table in the 'how and why we use your personal data' section:

- Bristol Memorial Woodland Trust, a registered charity that we work alongside. Bristol Memorial Woodland Trust create and preserve woodland areas for public benefit and also educate and inform on the topics of death, dying, bereavement and end of life care. When you sign a lease with us, you will also sign a plot purchase form with Bristol Memorial Woodland Trust. We may therefore share your Identity and Contact Data with Bristol Memorial Woodland Trust for these purposes, as well as details of your lease and chosen plot and any queries that we may receive from you, which relate to Bristol Memorial Woodland Trust.

- Third party service providers we use to help provide our services to you, e.g. our payment service and banking providers.
- Other third party service providers we use to help us run our business, e.g. our CRM system provider, communications and marketing support providers and our telephone system and other IT service providers.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also disclose your personal data to:

- Law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- Our external professional advisors (such as our lawyers or accountants).

We may also need to share personal data with other third parties, such as potential buyers of some or all of our business or during a company re-structuring. Alternatively, we may seek to acquire other business or merge with them. Personal data will be anonymised where possible, but this may not always be possible. The recipient of the personal data will be bound by confidentiality obligations.

4. Transferring your personal data out of the UK

To provide our services to you, it may sometimes be necessary for us to share your personal data outside the UK, for example, with our service providers who are either located outside the UK or who transfer personal data outside of the UK.

Transfers of personal data outside of the UK are subject to special rules under UK data protection law. This is because non-UK countries do not have the same data protection laws as the UK. We will ensure the transfer complies with data protection law and all personal data will be secure.

As a result, we will ensure that any transfer of your personal data outside of the UK complies with data protection law by following one of the below steps:

- Confirming that the recipient is located in a country which has been recognised as having an adequate level of protection for personal data.
- Putting in place safeguards (such as approved standard contractual clauses) so that you have enforceable rights and effective legal remedies, or ensuring that such safeguards have been put in place.
- Confirming that a specific exception applies under data protection law.

For more information about our international transfers, please contact us using the information below.

5. Cookies and other tracking technologies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. Cookies help us recognise you and your device and store some information about your use of our website. Please see the Cookies Consent Preferences pop up, accessible in the bottom left corner of our website, for further details of the specific cookies that we use.

6. Call recordings

We may record calls for training, monitoring and quality assurance purposes. Call recordings help us improve our services and maintain accurate records of communications. Any recordings will be stored securely and retained for no longer than is necessary. We normally retain call recordings for up to 90 days from the date of the call, unless a longer retention period is required to investigate a complaint or resolve a dispute.

7. Marketing

We may use your personal data to send you updates (by email or post) about our services. We may rely on our legitimate interests to send you postal marketing, but will ask for your consent to send you email marketing.

We may also send you support brochures and booklets on behalf of Bristol Memorial Woodland Trust. We will only do so where you opted in to receive these updates and materials from Bristol Memorial Woodland Trust.

Regardless of whether you have given your consent to receive marketing communications, or it is in our legitimate interests to send them, you always have the right to opt out of receiving further promotional communications by contacting us at admin@memorialwoodlands.com.

We may ask you to confirm or update your marketing preferences if there are changes in the law, regulation, or the structure of our business.

Please note that we may also send you other communications in relation to your purchase of services or in order to respond to queries you have raised, such communications are service communications and are not considered a form of marketing communications.

8. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing; —in certain other situations to our continued processing of your personal data, e.g.

	processing carried out for the purpose of our legitimate interests.

For further information about your rights please contact us or see the guidance provided by the UK Information Commissioner's Office (ICO) on individuals' rights.

If you would like to exercise any of your rights, please:

- Email, call or write to us — see the 'How to contact us' section at the end of this policy.
- Let us have enough information to identify you e.g. your full name and address or plot reference number.
- Let us have proof of your identity, if requested.
- Let us know which right you want to exercise and the data to which your request relates.

9. How long your personal data will be kept

We will not retain your personal data for longer than necessary for the purposes set out in this privacy policy. Different retention periods apply for different types of personal data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

As an indication, if you purchase services from us, we will keep your personal data while we are providing those services. Thereafter, we will keep your personal data for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf.
- To show that we treated you fairly.
- To keep records required by law.

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.

You can request further details of retention periods for different aspects of your personal data by contacting us.

10. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a personal data breach where we are legally required to do so.

11. How to complain

If you have a complaint about how we use your personal data, you can contact us using the details set out below. We will acknowledge receipt of your complaint within 30 days and will take appropriate steps to investigate and respond to your complaint without undue delay. We will keep you informed where appropriate and will tell you the outcome of our investigation.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (https://ico.org.uk/make-a-complaint/data-protection-complaints/). We would, however, appreciate the chance to deal with your concerns before you approach the ICO.

12. How to contact us

You can contact us if you have any questions about this privacy policy or the data we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

- **Address:**

  Memorial Woodlands
  Earthcott Green
  Near Thornbury
  Bristol
  BS35 3TA

- **Email:**

  admin@memorialwoodland.com

- **Contact telephone number:**

  01454 414999

13. Changes to this privacy policy

This privacy policy was last updated in October 2026. We keep our privacy policy under regular review to make sure it is up to date and accurate. If we change our privacy policy from time to time, we will post the details of any changes on our website. We may also take reasonable steps to notify you if the changes affect how your personal data is processed.