



## Privacy Notice for Introducers

### **This notice applies to sole traders and partnerships only**

#### **1. Scope**

In this privacy notice, 'us', 'we' or 'our' refers to Golden Charter Limited.

This notice applies to you, the data subject. We will always seek to use your personal data in accordance with the General Data Protection Regulation (GDPR).

#### **2. Responsibilities**

The Data Protection Officer is responsible for ensuring that this notice is made available to you prior to us collecting/ processing your personal data.

The privacy and security of your personal data is very important to us so we want to assure you that your information will be properly managed and protected when it's in our hands. Please read this notice carefully as it explains how we and/or carefully selected third parties we work with, collect and use your personal information.

These terms may apply in addition to other privacy notices or terms we inform you of in specific circumstances when we are collecting or processing personal data.

#### **3. Privacy Notice**

Who are we? - Golden Charter Limited is one of the UK's leading funeral plan providers and we are owned by a UK-wide national association of independent funeral directors. We are registered with the Funeral Planning Authority (FPA). If you would like to contact us about the personal data we hold on you please write, email or call your Account Manager, or use the information below:

**Contact Name:** Sales Support

**Address:** Golden Charter, 10 Canniesburn Gate, Bearsden, Glasgow, G61 1BF

**Email:** [salesupport@goldencharter.co.uk](mailto:salesupport@goldencharter.co.uk)

**Telephone:** 0800 145 6520

**Contact Name:** The Data Protection Officer

**Address:** Golden Charter, 10 Canniesburn Gate, Bearsden, Glasgow, G61 1BF

**Email:** [governance@goldencharter.co.uk](mailto:governance@goldencharter.co.uk)

**Telephone:** 0800 111 4514

What is personal data? - under the 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".*

Consent is required for Golden Charter to process both types of personal data, but it must be explicitly given for special category data. Where we are asking you for special categories of data we will always tell you why and how the information will be used. You may withdraw consent at any time by contacting your Account Manager, or using the contact details displayed above.

If you would like more information on GDPR and how it impacts you or your business, this can be found on the Information Commissioner's Office (ICO) website at [ico.org.uk](http://ico.org.uk).



The personal data we would like to collect from/ process about you for the purpose of promoting our products and services, and fulfilling the contract you have in place with us is:

- All details given by you on the Introducers Application Form; including your name, address, date of birth, telephone number, email and banking details.
- Any supporting documents sent to us by you during the application process i.e. proof of identification.
- Any personal or sensitive data which is publically available to us via online searches, captured at the due diligence checks stage of your application.
- Credit checks.

The personal data we collect will be used for the following purposes:

- To fulfil the terms set out in your Appointment letter and Introducer T&Cs, including ensuring any payments and commission clawbacks are made as set out in these terms.
- Marketing of Golden Charter's products and services.
- To monitor visitors to our website and responses to marketing campaigns.
- To answer enquiries from you.

Use of cookies - a cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on [ico.org.uk/for-the-public/online/cookies](http://ico.org.uk/for-the-public/online/cookies)

- We use cookies to identify you when you visit this website and to keep track of your browsing patterns.
- Most browsers will allow you to turn off cookies. If you want to know how to do this, please look at the menu on your browser, or look at the instructions on each browser's support site:
  - [Internet Explorer](#)
  - [Edge](#)
  - [Chrome](#)
  - [Opera](#)
  - [Vivaldi](#)
  - [Firefox](#)
  - [Safari](#)

Please note however that turning off cookies may restrict your use of our website.

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email, post or telephone) that we use to contact you, please contact your Account Manager or contact us using one of the methods shown above.

Our legal basis for processing your personal data may be classed as one of the categories below:

- Provision of a contract (as set out in your Appointment letter and Introducer T&Cs)
- Consent (as agreed by signing the Introducers Application Form)
- Legitimate interest

Any legitimate interests pursued by us are for our marketing purposes and we do not share your details with any third parties for marketing purposes.

In the unlikely event that Golden Charter enters into liquidation, administration, receivership or suffers some other similar insolvency event, the Golden Charter Trust shall become a data controller in respect of personal data relating to funeral plan customers that you have provided to us. More information about the Golden Charter Trust can be found on their website [www.goldenchartertrust.co.uk](http://www.goldenchartertrust.co.uk).

#### 4. Consent



By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Will Golden Charter share my personal data with anyone else? - We will pass your and/or your customers personal data on to third-party service providers contracted to Golden Charter in the course of dealing with you. This may include special categories of data where appropriate. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil your customers funeral plan or legal services product. When they no longer need the data to fulfil this service, they will dispose of the details in line with Golden Charter's procedures. If we wish to pass your special categories of data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise. See the table below for more information on the types of third parties.

## 5. Disclosure

Golden Charter will pass your personal data to third parties. The following third parties will receive your and/or your customers personal data for the following purpose(s) as part of the processing activities:

- **Funeral director** → the funeral director needs to know customer/ next of kin/ Representative details to allow them to arrange each funeral. Similarly, the funeral director will also be given details of the person who has sold the plan, in this case, you as the introducer. Funeral directors are allocated plans shortly after the time of purchase so a funeral director will hold your data for a period of time. Funeral directors that work with Golden Charter are bound by a Data Processor Agreement and act in compliance with our guidelines.
- **Fulfilment companies** → these are companies who will print and send Golden Charter's marketing and post purchase paperwork. Such companies that work with Golden Charter are bound by a Data Processor Agreement and act in compliance with our guidelines.
- **Third party payment processors** → Golden Charter uses a third party payment processor to take and process payments. Third party payment processors who work with Golden Charter are contractually bound to adhere to Data Protection legislation and act in compliance with our instructions.
- **Barnett Waddingham** → for administration of our funeral plans and facilitating Barnett Waddingham's role as actuaries to the Golden Charter Trust. If you would like more information about Barnett Waddingham and their own privacy notice please see their website [www.barnett-waddingham.co.uk](http://www.barnett-waddingham.co.uk) . We have detailed binding contractual arrangements which ensure that personal data is kept safe and used strictly in accordance with Data Protection legislation.
- **Third party supplier** → From time to time Golden Charter may use the services of market research companies to follow market trends and monitor satisfaction with our products and services. Third party suppliers who work with Golden Charter are contractually bound to adhere to Data Protection legislation and act in compliance with our instructions.

## 6. Retention period

Golden Charter will process personal data for the length of time required to fulfil our obligations contractually or legally.

Golden Charter will process (collect, store and use) the information you provide in a manner compatible with the GDPR.

We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Golden Charter is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.



Should your data be incorrect, you should contact us using the details above and we will correct this as soon as possible, but within a maximum of one month.

## 7. Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- 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 is 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. *Note, this cannot be actioned should you wish to continue to promote Golden Charter funeral plans or products and services as we will have a contractual right to do so.*
- Right to restriction of processing - where certain conditions apply you 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. Golden Charter will endeavour to provide you with the detail we hold on you to allow you to take it to another organisation. This may be limited by technological requirements.
- 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.
- Right to judicial review - in the event that Golden Charter refuses your request under rights of access, we will provide you with a reason why. You have the right to complain as outlined in the section below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

Can I find out the personal data that Golden Charter holds about me? - Yes, Golden Charter, at your request, can confirm what information we hold about you and how it is processed. In order to do this please write to The Data Protection Officer, Golden Charter, Canniesburn Gate, 10 Canniesburn Drive, Bearsden, Glasgow G61 1BF. Alternatively you can email your request to The Data Protection Officer at [governance@goldencharter.co.uk](mailto:governance@goldencharter.co.uk).

What forms of identification will I need to provide in order to access this? - Golden Charter accepts the following forms of identification when information on your personal data is requested: photographic identification such as a valid passport or driving license and a utility bill showing the same name and address.

## 8. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Golden Charter (or third parties as described above), please contact our Customer Resolution Team on 0800 171 2955 or email [customer.resolution@goldencharter.co.uk](mailto:customer.resolution@goldencharter.co.uk).

If you are unhappy with how your complaint has been handled, you have the right to lodge a complaint with Golden Charter's Data Protection Officer.

You also have the right, if you are still not satisfied with how we have handled your personal data, to contact the supervisory authority, the Information Commissioner's Office (ICO).

The details for each of these contacts are:

**Contact Name:** The Data Protection Officer

**Address:** Golden Charter, 10 Canniesburn Gate, Bearsden, Glasgow, G61 1BF



**Email:** [governance@goldencharter.co.uk](mailto:governance@goldencharter.co.uk)

**Telephone:** 0800 111 4514

**Contact Name:** Information Commissioner's Office

**Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Email:** [casework@ico.org.uk](mailto:casework@ico.org.uk)

**Telephone:** 0303 123 1113

Other websites linked on our site

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Notice. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy notice, which may differ from ours.

Amendments

Please note that this Notice is subject to change from time to time. It was last updated in June 2018.

**Document Control**

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.