



## Privacy Policy

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of Glasgow Crematorium. The use of the Internet pages of Glasgow Crematorium is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no other statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection law applicable to Glasgow Crematorium. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process.

Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, Glasgow Crematorium has implemented numerous technical and organisational measures to protect your personal data. However, the security of online systems cannot be secured absolutely.

For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

### 1. Definitions

The data protection declaration of Glasgow Crematorium is based on the terms used by the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

#### a) Personal data

Personal data means 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.

#### b) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

#### c) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### d) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.



**e) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**f) Pseudonymisation**

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**g) Controller or controller responsible for the processing**

**Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.**

**h) Processor**

Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**i) Recipient**

Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

**j) Third party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**k) Consent**

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**2. Name and Address of the controller**

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union

Scottish Cremation Society Ltd (trading as Glasgow Crematorium)  
 25 Bothwell Street  
 Glasgow  
 G2 6NL

Email: [info@glasgowcrematorium.com](mailto:info@glasgowcrematorium.com)

Website: <http://glasgowcrematorium.co.uk/>



### 3. Cookies

The Internet pages of Glasgow Crematorium use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Glasgow Crematorium can provide the users of this website with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our website can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our website. The website user that uses cookies e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

### 4. Collection of general data and information

The website of Glasgow Crematorium collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Information collected includes (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Glasgow Crematorium does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Glasgow Crematorium analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.



### **Information collected by Glasgow Crematorium**

We collect a range of information containing personal data about you:

- Your name, address, and contact details (address, telephone number and email address)
- Financial information such as your bank account, debit or credit card details (where you are making a payment to us)
- CCTV images of you in the crematorium and in the parking areas (please note that services which take place at the crematorium are not recorded)

We will collect this information from you in a variety of ways – directly from you, when you use our website and from your employer, if you are a supplier or contractor.

Your personal data will be retained in hard copy in files which are stored in a locked cabinet and in our IT system.

### **Why we process your personal data**

Where you are using or interested in using our services, we will use your personal data to enter into a contract with you, in order to implement our obligations and enforce our rights in terms of the contract we have with you.

Where we do not have a contract with you but we use your personal data in relation to a contract for provision of our services, we have a legitimate interest to use your personal data relevant to give effect to that contract.

We have a legitimate interest in processing your personal data where you are an employee at one of our contractors or suppliers.

We also have a legitimate interest to use CCTV to protect the safety and security of our customers, members of the public and our staff.

There may be some occasions where we seek your consent to process personal data but if we do so, we will provide full details of what we are seeking consent for, so that you will be able to carefully consider whether to provide that consent. Where you have provided consent to us for processing, you have the right to withdraw that consent.

### **Who has access to your personal data**

We will share your data with third parties, including sub-contractor engaged by us to provide services on our behalf including IT and software service providers; cloud computing service providers and our payment providers. Where these providers process personal data on our behalf we have appropriate contractual arrangements in place to ensure the security and confidentiality of your data.

We do not share your data with any other companies or organisations for their own purposes or for sending their marketing communications to you.

We will share your data as required by law.

We will also share your personal data in the context of a sale of some or all of our business. In those circumstances the data will be subject to confidentiality agreements.

If your personal data is transferred out with the EU we will ensure that adequate safeguards are in place, an adequacy agreement or other contractual arrangements are in place as required by law.



## 5. Rights of the data subject

### a) Right of confirmation

Each data subject shall have the right to obtain from us confirmation as to whether or not personal data concerning him or her are being processed.

### b) Right of access

Each data subject shall have the right to access to his or her personal data. The data subject is also entitled to be provided with the following information:

the purposes of the processing;

- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

### c) Right to rectification

Each data subject shall have to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed.

### d) Right to erasure (Right to be forgotten)

Each data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.



**d) Right to erasure (Right to be forgotten) (Cont'd)**

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing. The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of the available technology and the costs of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required.

**e) Right of restriction of processing**

Each data subject shall have to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data. The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead. The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

**f) Right to data portability**

Each data subject shall have the right to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided where:-

the processing is based on consent pursuant to point (a) of article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.



**g) Right to object**

Each data subject shall have the right to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Glasgow Crematorium shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If Glasgow Crematorium processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Glasgow Crematorium for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

**h) Automated individual decision-making, including profiling**

Each data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Glasgow Crematorium shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

**i) Right to withdraw data protection consent**

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

**6. Data protection provisions about the application and use of Google Analytics (with anonymization function)**

On this website, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics the controller uses the application "\_gat.\_anonymizelp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.





Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the service, and to give website owners a sense of which country, state, or city in the world their users come from (also known as "IP geolocation"). Google Analytics provides a method to mask IPs that are collected (detailed below) but we do not have access to your personal data via Google Analytics.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link [https:// tools.google.com/ dlpage/ gaoptout](https://tools.google.com/dlpage/gaoptout) and install it. This browser add on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under [https:// www.google.c om/intl/en/ policies/ privacy/](https://www.google.com/intl/en/policies/privacy/) and under

[http:// www .google.com/ analytics/ terms/ us.html](http://www.google.com/analytics/terms/us.html). Google Analytics is further explained under the following Link [https:/ /www.google.com/ analytics/](https://www.google.com/analytics/).

## **7. Period for which the personal data will be stored**

We will only retain personal data for as long as is necessary for the purpose for which it is processed. The criteria used to determine the period of storage of some personal data will be determined by a mandatory statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract. For further details, please see our data retention policy.





**8. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data**

Where you have entered into a contract with us, the non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded, that we are unable to properly implement the contract or that you may not be able to fully exercise your rights under that contract.

**9. Existence of automated decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

**10. Comments and Complaints**

If you would like to exercise any of your rights or have any queries about the way in which your personal data is being processed, please contact the Executive Secretary at

Glasgow Crematorium  
Western Necropolis  
Tresta Road  
Glasgow  
G23 5AA  
Tel: 0141 946 2895

Email: [info@glasgowcrematorium.com](mailto:info@glasgowcrematorium.com)

If we are unable to resolve any concerns or if you think that we have not complied with your data protection rights, you can complain to the Information Commissioner's Office at

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113  
[www.ico.org.uk](http://www.ico.org.uk)