

About this Privacy Policy

This Privacy Policy is intended to help you understand who we are, how we collect and use your data, how we share it, your choices about how your data is used and shared, and your rights under the privacy laws that apply to you.

Who we are

My Farewell Wishes Limited (“**MFW**”, “**we**”, “**us**” or “**our**”) is an advanced funeral planning company that offers funeral planning services that help customers decide their funeral wishes along with us and our affiliated funeral directors through free or paid memberships (the “**Services**”).

We are a company established in Ireland and located in Hall Street, Kingscourt, Cavan, Ireland. My Farewell Wishes acts as data controller of the personal data we collect when you use or visit our website.

We work with our affiliated funeral directors to provide the Services. MFW and your chosen funeral director act as joint controllers to provide the Services to you. We have entered into agreements with our affiliated funeral directors to allocate our respective responsibilities under the GDPR with respect to providing the Services, for example:

- Our affiliated funeral directors are responsible for providing you with information (including this Privacy Policy) on the use of your personal data in connection with the Services in addition to obtaining your consent to the processing of sensitive personal data; and
- We are responsible for managing your individual rights relating to the Services such as the right to access or delete your data. For information on how to exercise your rights see Sections 7 and 8 below. For more information about our affiliated funeral directors and how we work with them you can contact us as described in Section 10 below.

1. Who is covered by this Privacy Policy

This Privacy Policy applies to you when:

- You use or visit our website,
- you use or interact with our Services, or
- a user of the Services shares your personal data with us, for example by nominating you as his/her Representative.

2. Cookies

We use cookies and other technologies when you visit our website and also when you use third-party websites and apps that use our Services. You can learn more about how we use cookies and similar technologies in our cookie policy.

3. What data does My Farewell Wishes collect about you?

When you use our Services, we collect different types of data, from your registration data, to the membership you’re signed up to and more. The types of data we collect about you depend on your membership type and the ways that you interact with us. Please refer to this section to learn more about what data we collect about you.

We collect data that you provide to us when you use our Services.

- your name, address, email, date of birth, phone numbers, PPS number and gender identity, when you sign up for an account
- payment data, such as your bank account number and payment card details, to complete transactions for memberships that require a subscription
- information about your religious or philosophical beliefs, should you choose to provide this information to us
- any other personal information you choose to provide to us, for example in your Record of Wishes Form

We collect data that you provide to us when you use our website

- Device and usage information about your use of our website, such as your browser and device type, and how you interact with our website.
- Information that you provide when you contact us, such as your name, telephone number and email address.

We collect data about you that other parties provide to us

- Information about you, such as your name, address, phone number and email address when one of our members identifies you as their personal representative or alternative representative
- Information that you provide to your chosen funeral director, such as when you complete your Record of Wishes form
- Verification documents such as a copy of your passport, national ID card or driving licence that you provide to your funeral director before your payments can be processed by the My Farewell Wishes Trust (the “Trust”)

Use of The Next Steps Platform

When you access **The Next Steps** aftercare platform, we collect and process limited personal data in order to provide access to the platform and support the bereavement aftercare process.

This includes:

- Your name and email address, which you provide when accessing the platform via the gateway screen;
- Confirmation that you have accepted this Privacy Policy as a condition of accessing the platform;
- Your preference as to whether you wish to receive an optional email guidance series relating to the aftercare process.

Access to The Next Steps platform is granted once you submit your details and accept this Privacy Policy.

Email communications are not required to access or use the platform.

We may send you a single initial informational email following access to the platform.

If you separately choose to opt in, we will also use your email address to send you an optional guidance email series relating to the aftercare process. You may withdraw your consent to receive this email series at any time.

Your name and email address will be made available to **My Farewell Wishes** and to the funeral

director whose platform you are using, for the purposes of administering and supporting the platform.
 My Farewell Wishes and the relevant funeral director act as joint controllers in respect of this processing.

4. How does My Farewell Wishes use your data?

When you use our Services or visit our website we use your data for different purposes to deliver the Services. Please refer to the table below to learn more about how and why we process your data, and our legal bases to do so.

Purpose for which we use your data	Examples of how we use your data to achieve the purpose	Legal Bases
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- To provide the Services to you with the trustee of the Trust
- We process your name, email where your address, physical address, Contractual Necessity – this credit card number, expiration information is necessary for us date and security code when to provide the Services to you. you subscribe to any of our paid memberships
 - We store data about you, to make them available at your request when you use our Services
 - We share your personal data with your chosen funeral director and with our third party payment services providers
 - We share your personal data

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Purpose for which we use your data	Examples of how we use your data to achieve the purpose	Legal Bases
	membership involves a paid subscription	

<p>To provide the Services</p> <p>To answer your questions</p> <p>To understand, maintain, develop and improve our Services and our website</p>	<ul style="list-style-type: none"> ● We process the personal data of your personal representative(s), including name, address, email address and phone number to provide the Services. For example, we will distribute your wishes to your Representative ● We process your personal data when you enquire about potentially using our Services. ● We process information about how you use our Services and website (such as device and usage information). 	<p>Legitimate interest – we rely on your legitimate interest in ensuring your wishes are accurately carried out and communicated to the correct person, and our legitimate interest in providing the Services</p> <p>Legitimate Interests - we rely on our legitimate interest in responding to your comments and enquiries</p> <p>Legitimate Interest – we rely on our legitimate interest in providing a functional website, and our legitimate interest in developing and improving our Services</p>
<p>To provide the Services to you in accordance with your religious or philosophical beliefs</p>	<ul style="list-style-type: none"> ● We process information you provide to us about your religious or philosophical beliefs ● We share information about your religious or philosophical beliefs with your chosen funeral director 	<p>We rely on your consent to process information about your religious or philosophical beliefs</p>
<p>To verify your identity</p>	<ul style="list-style-type: none"> ● We share your verification documents (such as a copy of your passport or driving license) received from your funeral director with the trustee of the Trust to verify your identity before the Trust may lawfully process your subscription payment(s) 	<p>Compliance with legal obligations in respect of anti-money laundering laws (for example, know-your-customer checks are run on our clients and also on funeral directors that work with us)</p>

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When we rely on legitimate interest to process your data, we offer you the choice to object unless there are overriding circumstances (for example, to protect the fundamental rights and freedoms of other individuals).

Where we rely on your consent to process your data, you may withdraw your consent at any time without affecting the lawfulness of any processing prior to the withdrawal.

5. How does My Farewell Wishes share your data?

We work with affiliated funeral directors and partners to bring you a variety of funeral services, and to make our Services more interactive and secure.

We share data with funeral directors

We share data with our affiliated funeral directors in order to (i) obtain a quote from that funeral director to carry out your funeral wishes, (ii) update a funeral director with any changes to your funeral wishes and (iii) provide the Services to you.

We share data with Personal Representatives, Alternative Representatives and/or Executors/Executrixes

We may share data with your Personal Representatives, Alternative Representatives and/or Executors/Executrixes (as applicable) in order to (i) inform them that you have named them as the person to contact in respect of your recorded funeral wishes (if you ask us to do so when recording your funeral wishes) and (ii) provide them with the details of your recorded funeral wishes upon your death so that they may carry out your funeral wishes.

We share data with our vendors

We share data with our vendors (sometimes referred to as “processors”) that work on our behalf and process your data solely at our direction. We only work with vendors that have in place appropriate confidentiality and security measures to protect your data. Vendors include businesses that assist us with data hosting, analytics, security and combatting fraud and other unlawful behaviour. For example, we share your payment data with our payments processor, Senteniel Limited, where you choose to pay for the services using direct debit.

We share data with the Trust

Where you become a member of the MFW Funeral Plan, we will share your personal data with the Trust for the purposes of managing your funeral cost deposit payments. The Trust is managed by Independent Trustee Limited (the “Trustee”).

We will share data as part of a change in ownership

If the ownership or control of all of My Farewell Wishes or a specific Service changes or is proposed to change as a result of a merger, acquisition or sale of assets, we may transfer your information to the new (or prospective) owner.

6. How does My Farewell Wishes transfer your personal data outside of the EEA?

We do not routinely transfer your personal data outside of the EEA. However, in certain exceptional circumstances we may need to do so in connection with the Services, such as if you move abroad or if repatriation is required in the event that death occurs outside the EEA. Where we transfer your personal data outside of the EEA we will do so on the basis of a valid European Commission adequacy where available, or otherwise on the basis of consent or contractual necessity as appropriate.

7. How do you exercise your privacy rights over how My Farewell Wishes uses your data?

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. We will inform you of relevant exemptions we rely upon when responding to any request you make.

To exercise any of these rights you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to complain to the Irish Data Protection Commission or your local data protection authority.

8. For how long does My Farewell Wishes keep your data?

We generally store your data for as long as necessary to deliver our Services and for security purposes. In some cases, we store your data for longer, for example when we need to comply with legal obligations. For example,

- we store your account information and information you provide during the account registration process, including name, phone number, mail address, date of birth, and country for 18 months from the termination of the membership.
- we store billing and subscription information for 7 years, to comply with legal obligations.

We keep data for longer than needed for the purposes set out in this Privacy Policy in limited cases. For example for back up purposes or in order to comply with our legal obligations, resolve disputes or enforce our agreements in specific instances.

9. How do you learn about changes to this Privacy Policy?

We will make changes to this Privacy Policy from time to time. If we make significant changes to how we present our Privacy Policy to you, or how we use or share your personal data from what we told you when we collected your data, we will inform you in advance.

10. How to contact us

If you have any questions about your rights or your privacy, or if you would like to raise a concern about your privacy rights with us, please contact us at the following e-mail address: info@myfarewellwishes.ie. You can also write to us at My Farewell Wishes Limited, Hall Street, Kingscourt, Cavan, Ireland.

