Kilternan Cemetery Park Privacy Statement

Who we are and how to contact us

This statement explains how we handle personal information when you visit our website, contact us, subscribe to our newsletter, arrange cemetery services, or deal with us as a plot owner, family member, representative, supplier or business contact. It covers information held electronically and on paper.

The controller responsible for this information is Kilternan Cemetery Park Limited, trading as Kilternan Cemetery Park, Ballycorus Road, Kilternan, Dublin 18, Ireland.

For questions about this statement or to exercise your data protection rights, contact us at info@kilternancemetery.ie, telephone +353 87 092 7372, or write to the address above, marked “Privacy”.

We handle personal information under the EU General Data Protection Regulation (GDPR), the Irish Data Protection Act 2018 and, where applicable, Ireland’s electronic communications privacy rules, including S.I. No. 336/2011 as amended.

Information we collect and where it comes from

We collect information you give us through our website forms, email, telephone, correspondence and dealings with our team. For cemetery arrangements, we may also receive relevant information from your funeral director or someone acting on your behalf.

- Enquiries: your first and last name, email address, message, any optional telephone number you provide, and related correspondence. Our Contact Us form requires a name, email address and message so we can deal with your enquiry; telephone details are optional.
- Newsletter subscriptions: your email address, any name supplied, subscription status and preferences, and records of when and how you subscribed or withdrew consent.
- Cemetery services: information needed to identify plot owners, purchasers, authorised representatives and next of kin; contact addresses; plot and interment details; relevant instructions and correspondence; and transaction and payment records. We collect further identifying information only where it is needed for a particular arrangement or record.
- Supplier and business contacts: names, business contact details, correspondence and information needed to administer our business relationship.
- Website information: information such as IP address, browser and device details, pages accessed and access times, depending on the website features used and your cookie choices.
- CCTV: images of people and vehicles within camera coverage on our premises, together with recording dates and times.

Please provide only information relevant to your enquiry. Do not send payment-card details, identification documents, or unnecessary health or religious information through a general website form. If you provide another person’s details, please make sure you are entitled to do so and bring this statement to their attention where appropriate. We remain responsible for our own transparency obligations.

How and why we use information

Responding to enquiries

We use the information in your enquiry to respond, communicate with you about the matter you raised, and keep an appropriate record of that correspondence. Where you ask us to take steps towards a contract with you, our legal basis is taking those steps at your request. For other enquiries, our basis is our legitimate interest in answering correspondence and providing an effective service.

Our website is hosted on Wix. When you submit a Contact Us form, the submission is automatically stored within our Wix account and may create or update a contact record.

We may retain relevant correspondence where needed to meet a legal obligation or deal with a complaint or legal claim.

Providing cemetery services and maintaining records

We use relevant information to arrange and administer cemetery services, record plot ownership and interments, communicate with plot owners and representatives, and manage payments and related correspondence.

Where particular information is needed to arrange a service or comply with a legal requirement, we explain this when collecting it. Without that information we may be unable to complete the requested arrangement.

We use PlotBox to record and manage information collected during the purchase of a plot and the administration of cemetery arrangements.

We accept payments on site or by telephone, rather than through an online checkout. Payment transactions involve our payment providers and banks, and we retain relevant transaction records for administration and accounting.

Our basis is performance of a contract where you are the contracting party, or steps you request before entering that contract. Where we handle the details of relatives, next of kin or representatives who are not parties to the contract, we rely on our legitimate interests in administering arrangements accurately and maintaining reliable cemetery records, subject to their rights and interests. Where a specific legal recordkeeping or reporting duty applies, we rely on compliance with that duty.

Managing our business and protecting information

We use business contact and transaction details to manage supplier relationships and payments. The basis is our contract with the individual concerned, or our legitimate interest in administering the relationship where the contact represents another organisation. We use necessary financial information to meet applicable accounting and tax obligations.

We also use necessary information to maintain website and system security, prevent misuse, handle complaints, and establish, exercise or defend legal claims. Our basis is our legitimate interest in protecting our services, records and legal rights, or a legal obligation where one applies. We assess legitimate interests against the rights and reasonable expectations of the people affected.

CCTV security

We operate CCTV on site for security, including protecting people and property and investigating security incidents. CCTV does not record audio. Our basis is our legitimate interest in securing the premises, assessed

against the privacy of visitors and staff. Access to footage is restricted to authorised people who need it for these purposes. Relevant footage may be shared with An Garda Síochána, insurers or legal advisers where necessary and lawful for a particular incident or claim.

Newsletters and your marketing choices

We use your email address to send newsletters, park news, updates and event invitations only when you opt in. Our legal basis for this email marketing is your consent.

You can subscribe through our newsletter form or by selecting the separate newsletter option on a form where that option is offered. The option starts unticked. On an enquiry form it is optional: you can submit your enquiry and receive a reply without subscribing.

When you subscribe, we may automatically email you the current newsletter or a welcome message. Your subscription also allows us to send future newsletter emails until you unsubscribe. Wix helps us store subscriber details, record preferences and send these messages. We retain evidence of your choice so we can demonstrate consent.

Every marketing email includes an unsubscribe option. You can also withdraw consent by contacting us using the details above. Withdrawal does not affect the lawfulness of processing before you withdrew. We stop marketing to you when you unsubscribe, but may keep a limited record of the opt-out to make sure you are not added back to the mailing list accidentally.

Unsubscribing from newsletters does not prevent us from replying to an enquiry or sending necessary communications about a service you have requested. These communications are not used to bypass your marketing choice.

We use delivery and subscription information to administer the mailing list, handle failed deliveries and honour opt-outs. The basis for these administrative records is our legitimate interest in operating the requested mailing service reliably and meeting our data protection responsibilities; newsletter content itself is sent on the basis of consent.

Cookies and embedded services

Our website uses cookies and similar technologies. Some are strictly necessary to provide a service you request, such as maintaining essential website functionality or remembering privacy choices. Other technologies, including non-essential analytics or advertising technologies, require your consent before they store or access information on your device.

We use Wix’s built-in reporting tools to understand website use and performance. We do not use Google Analytics or advertising pixels.

We also maintain a Google Business Profile. Google handles information about your use of that service under its own privacy terms. If you contact us through it, we use information we receive to deal with your enquiry as described in this statement.

Where consent is required, you can accept or refuse the relevant categories and change your choice through the website’s cookie settings. Refusing non-essential cookies does not subscribe or unsubscribe you from email newsletters. Browser controls can also manage cookies, although blocking essential cookies may affect website features.

Our website includes Google Maps to help visitors find us. Loading an embedded map can disclose technical information, such as your IP address, to Google; this may happen when the map loads, rather than only when you click it. Google's use of information is explained in its privacy policy at https://policies.google.com/privacy.

Who receives information

Access within our organisation is limited to people who need information for their work. Where necessary for the purposes described above, information may also be handled by:

- Wix and its authorised service providers for website hosting, form submissions, contact management and email delivery;
- PlotBox for administering plot and cemetery records;
- payment providers and banks for payments made on site or by telephone;
- providers of our email, IT support, record storage and related business systems;
- funeral directors and authorised representatives involved in the arrangements concerned, where sharing is necessary and lawful;
- professional advisers and insurers where necessary for advice, a complaint or a claim; and
- public authorities, courts or other recipients where disclosure is required or otherwise permitted by law.

We share only the information needed for the relevant purpose. Providers processing information on our behalf are subject to appropriate contractual requirements. Some recipients, including professional advisers or authorities, may act as controllers responsible for their own use of information.

Google's handling of information through embedded Maps is described above.

Information processed outside the EEA

Using Wix can involve processing outside the European Economic Area. Wix's Data Processing Agreement states that information is initially transferred to Wix.com Ltd in Israel under the European Commission's adequacy decision. Its onward transfers rely on applicable adequacy decisions or appropriate safeguards, such as Standard Contractual Clauses.

Wix's agreement is available at https://www.wix.com/about/privacy-dpa-users and its service-provider list at https://support.wix.com/en/article/list-of-wixs-sub-processors. You can contact us for further information about safeguards relevant to your information or a copy of applicable safeguards, subject to necessary redactions.

How long we keep information

We keep personal information only while it is needed for the purpose concerned or to meet a relevant legal requirement. Different records have different retention needs.

- Enquiries that do not lead to a service: after the enquiry is resolved, unless a documented complaint, dispute or legal obligation requires particular information to be kept longer. The period applies to relevant copies in Wix and email systems, not just the form submission.
- Enquiries leading to a service: relevant correspondence becomes part of the service record and follows its retention requirements; unnecessary duplicate information is removed.
- Newsletter subscriptions: while your subscription remains active and the mailing list continues to serve its stated purpose. We review the list periodically for information that is no longer needed and do not treat a subscription as a reason to keep unrelated enquiry messages indefinitely.

- Consent and opt-out evidence: the minimum needed to demonstrate our handling of consent, resolve relevant complaints and prevent unwanted marketing. We restrict its use to those purposes and review whether it remains necessary.
- Cemetery and plot records: for as long as necessary to administer continuing plot rights, identify interments and meet applicable recordkeeping obligations. Some core records may need long-term retention; this does not justify keeping every related piece of correspondence indefinitely.
- Financial, supplier and claims records: for the applicable accounting, tax or other legal period, or while reasonably necessary for the relationship or a relevant claim.
- CCTV. Footage relevant to a specific incident may be isolated and retained for the investigation or related legal proceedings, with access restricted and continued retention reviewed.
- Technical and cookie information: for the periods explained in the cookie notice or the applicable security retention schedule. [

At the end of the applicable period, we securely delete or irreversibly anonymise information, subject to lawful exceptions. Backup copies are managed under the relevant provider's deletion and backup cycle and are not used as an active mailing list.

Protecting your information

We use appropriate technical and organisational measures to protect personal information against unauthorised access, loss, alteration and disclosure. Measures include controlling access to records and systems, requiring confidentiality, and reviewing security arrangements. No method of electronic transmission or storage is completely secure.

Your data protection rights

Depending on the circumstances, you can ask us to:

- confirm whether we process your personal information and provide access to it;
- correct inaccurate information or complete incomplete information;
- erase information where the legal conditions for erasure apply;
- restrict processing, for example while a relevant accuracy dispute is considered; and
- provide information you supplied in a structured, commonly used, machine-readable format, and transmit it to another controller where technically feasible, when the portability right applies to automated processing based on consent or contract.

You can object, on grounds relating to your particular situation, to processing based on legitimate interests. We must stop unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed for legal claims. You have an unconditional right to object to processing for direct marketing, including related profiling. You can withdraw consent at any time where we rely on it.

Some rights have legal limits. For example, we may need to retain particular records to comply with a legal obligation or deal with a legal claim. If we cannot comply with a request, we explain why and tell you about complaint and judicial remedy options.

Contact us using the details at the start of this statement. We normally respond without undue delay and within one month of receiving your request. Where legally permitted because of complexity or the number of requests, we may extend this by up to two further months and will explain the extension within the first month. We may request proportionate information to verify your identity if we have reasonable doubts. Requests are normally free of charge.

You can complain to Ireland's Data Protection Commission at https://www.dataprotection.ie, or to another competent supervisory authority. You do not have to contact us first.

Automated communications

Our newsletter system can automatically send an email following a subscription. This is an automated communication, rather than a decision producing legal or similarly significant effects. [CONFIRM whether any other profiling or significant automated decision-making occurs; describe it if applicable.]

Changes to this statement

We review this statement when our services or processing practices change. We publish the updated version with its revision date and bring material changes to your attention where appropriate. A policy update does not itself authorise a new marketing purpose or replace consent where consent is required.