
Dignity Customer Privacy Notice

Simplicity Cremations is a trading name for Dignity Funerals Limited.

This Privacy Notice is in respect of products and services provided by the companies listed below. Please note, Dignity Funerals Limited trades as Dignity Funeral Plans, Dignity Funeral Directors, The Crematorium Group and Simplicity Cremations.

We're committed to providing you with the highest possible levels of service, security, and protection when we process your personal data.

Personal data is any information that can be used to identify you as a unique individual. We must process your personal data fairly and lawfully. This also means you're entitled to know how we intend to use your data. You can then decide if you want to give it to us so we can provide the product or service you need.

All our employees are responsible for maintaining customer confidentiality and we provide training to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

We're an organisation that offers a wide range of services to support our customers. When we say 'Dignity' or 'we' in this notice, we mean all our businesses listed below.

- Dignity Funerals Limited (Which trades as Dignity Funeral Plans, Dignity Funeral Directors, The Crematorium Group and Simplicity Cremations)
- Farewill Funerals Limited
- Farewill Legal Services Limited
- Farewill Ltd
- Farewill Trustees Limited
- The Farewill Funeral Plans Limited Trust
- Le Pitcher & Quesne Limited (Jersey)
- Dignity Funerals No 3 Limited
- Trustees of the Dignity Pension and Assurance Scheme
- Dignity (2002) Limited
- Dignity Group Holdings Limited (formerly Dignity plc)
- Advance Planning Limited
- Dignity Pre-Arrangement limited
- Dignity Beyond Life Limited

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post: Dignity , 4-10 King Edwards Court, King Edwards Square, Sutton Coldfield, West Midlands, B73 6AP

Telephone: 0808 196 9678

Email: DPO@dignityuk.co.uk

What information we collect, use, and why

Activity by type	What types of data will be collected	What will the data be used for?
Online wills	• Basic identifiers including name, surname, date of birth, age, gender • Contact details such as address, email address, telephone number • Payment information ie credit / debit card details. • Relationship status • Financial assets including: • properties owned, how they are owned and who with (including their full legal name and address if different to any previously mentioned), value of property and mortgage(s) remaining. • Bank and building society accounts, name(s) on account, value of account, how the account is held. • Information on and value of personal possessions. • Information on and value of vehicles owned. • Information on and value of shares and investments owned. • Name, value and description of any partnerships or businesses owned (including agreements in place, their role in	To enter into a contract with you to provide the service requested (as set out in our terms and conditions). To respond to enquiries about our services. To enable us to contact you in relation to our services. To take payment from you for provision of our services. To allow charities to communicate with you.

	the business and anything else deemed relevant). • Information on and value of life insurance policies (including if these are written into trust and the beneficiaries). • Information on and value of pension policies (including if these are written into trust and the beneficiaries). • Information on and value of death in service benefit (including if these are written into trust and the beneficiaries). • Details and value of any assets held overseas. • Beneficiaries' and executor's details including names, dates of birth, addresses, email addresses and telephone numbers. • Family details including dates of birth, addresses, email addresses and telephone numbers. • Technical information including IP address, login details, browser type and version, time zone setting, browser plug-in type and versions, operating system and platform • Information about your website visit including URL, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information, methods used to browse away from the page • Personal data collected in the course of browsing our website and social media pages by our cookies and similar technologies (see Cookies Policy) • Recordings of phone calls	
Telephone wills	• Basic identifiers including name, surname, date of birth, age, gender • Contact details such as address, email address, telephone numbers • Nationality • Country of origin and domicile • Marital status of parents at birth and parents permanent place of living at your birth • Payment information i.e. debit / credit card details • Relationship status • Employment information including occupation, job role and description, employer. • Partner's name, date of birth, address, email address and phone number. • Guardian's names, addresses, dates of birth, email addresses and phone numbers • Financial assets including: • Properties owned, how they are owned and who with (including their full legal name and address if different to any previously mentioned), value of property and mortgage(s)	To enter into a contract with you to provide the service requested (as set out in our terms and conditions). To respond to enquiries about our services. To enable us to contact you in relation to our services. To take payment from you for provision of our services. To allow charities to communicate with you.

	remaining • Bank and building society accounts, name(s) on account, value of account, how the account is held. • Information on and value of personal possessions. • Information and value of vehicles owned. • Information on and value of shares and investments owned. • Name, value and description of any partnerships or businesses owned (including agreements in place, their role in the business and anything else deemed relevant) • Information on and value of life insurance policies (including if these are written into trust and the beneficiaries). • Information on and value of pension policies (including if these are written into trust and the beneficiaries). • Information on and value of death in service benefit (including if these are written into trust and the beneficiaries). • Details and value of any assets held overseas. • Beneficiaries' names, relationship to you, dates of birth, email address, home address. These details can also include whether the beneficiary is in receipt of benefits, vulnerable, or living with a disability. • Executors' names, relationship to you, dates of birth, email addresses and home addresses. • Family details including dates of birth, addresses, email addresses and telephone numbers. • Trustees' details including names, relationship to you, dates of birth, email addresses and home addresses. • Health information in instances where you may lack capacity • Recordings of phone calls	
Funeral services, including the use of our crematoria	• Basic identifiers including name, surname, age, marital status, gender • Contact details such as address, email address, telephone numbers • Point of contact for arranging the funeral, including name and contact details (if different from above) • Family details including names, relationship to the deceased and to you, addresses, email addresses and telephone numbers • GP details (or the deceased's normal medical practitioner) including name, address and telephone number • Medical professional details of the last two doctors to attend the deceased • Medical Doctors: Full name, address, telephone number, registered qualifications, GMC Reference number	To enter into a contract with you to arrange a funeral. To respond to enquiries about our services for arranging funerals. To enable us to refer you to our direct cremation and funeral partners. To ensure we can calculate an accurate quote for arranging a funeral.

	• Medical referee: Name, signature, and date • Executors' names, relationship to you, dates of birth, email addresses and home addresses • Nominated Administrator: Name and email address • Executor: Name • Grave owner: Name, address, and telephone number • Designated person for collecting ashes following direct cremation, including name and contact details • Religious beliefs if relevant to the funeral service • Payment information i.e. debit / credit card details • For DWP claimants: National Insurance number, claimant's name, claimant's address, deceased's name • Next of kin (where this is not our client): Name, address, postcode, telephone number, relationship • Client/Next of kin: Name, email and postal address, telephone number • If you make an enquiry / request a quote online, we collect technical information including IP address, login details, browser type and version, time zone setting, browser plug-in type and versions, operating system and platform, information about your website visit including URL, clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information, methods used to browse away from the page • Personal data collected in the course of browsing our website and social media pages by our cookies and similar technologies (see Cookies Policy) - Recordings of phone calls	To ensure you have the right to arrange a funeral on behalf of the deceased. To enable us to contact you in relation to the funeral arrangements. To take payment from you for the provision of the funeral arrangement service. The Provision and administration of funeral notices To obtain Authorisation of cremation. For our legal and regulatory record-keeping and compliance purposes.
Funeral Plans	• Basic identifiers including title, name, surname, date of birth, age, gender • Contact details such as address, email address, telephone numbers • Payment information ie credit / debit card details • Details relating to a customer's vulnerabilities (with their consent) • Personal details of a Nominated Representative (if they want one), or if you are buying the service for another person. including name, surname, phone number, email address and address • Recordings of phone calls. • If you make an enquiry / request a quote online, we collect technical information including IP address, login details, browser type and version, time zone setting, browser plug-in type and versions,	To enter into a funeral plan contract with you for the purposes of arranging a funeral. To respond to enquiries about our funeral plan services. To make reasonable adjustments for someone who needs them. So we can send the Nominated Representative details of the funeral plan. To ensure we can contact you in relation to the funeral plan.

	operating system and platform, information about your website visit including URL, clickstream to, through and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information, methods used to browse away from the page • Personal data collected in the course of browsing our website and social media pages by our cookies and similar technologies (see Cookies Policy)	To take payments from you in relation to the funeral plan. For our legal and regulatory record-keeping and compliance purposes.
Probate and Estate Administration	• Basic identifiers including name, surname, date of birth, age, gender • Contact details such as address, email address, telephone numbers • ID documents i.e. copy passport or driving licence, which include DOB (note if utility bills provided as ID and there are other people alongside the contact who pay the bill, we may inadvertently receive their personal data also (name, address)) • Contact information for nominated points of contact, co-executors, co-owners of the deceased person's jointly owned assets, guardians, trustees and beneficiaries including name, date of birth, address, email address, telephone numbers and relationship to the person who has died • Other family information relevant to the estate including benefit entitlement, whether the beneficiary is in receipt of benefits, vulnerable, or living with a disability • In the case of minor beneficiaries, contact details of their legal guardian's / those with parental responsibility • Contact details of a personal creditor who loaned money to the deceased or the details of someone who received gifts (Potentially Exempt Transfer and Gift of Reservation of Benefit) from the deceased before they died (name/ address/ email/ telephone/ DOB) • Contact details of who is holding the keys to the property / occupying the property / storing the original will • Name/ address of co-owners of property in the event of property title deed searches • Name/address of joint account holders or trust beneficiaries of the deceased in the course of searches • Details of any persons disputing the will or intending to make a claim against the deceased person's estate, including name, address, relationship to the deceased • Recordings of phone calls	To provide guidance on the administration of an estate. To enable us to refer you to our subsidiary, Farewill Legal Services Limited or to one of our external legal partners for our probate services. To respond to any enquiries about our probate services. For our legal and regulatory record-keeping and compliance purposes.
Complaints	• Name, enquiry number, contact details, any information relevant to your query or complaint	To respond to your query or complaint.

		To resolve your complaint.
Special Category Data (where we have explicit consent)	• racial or ethnic origin • political opinions • religious or philosophical beliefs • trade union membership • genetic data • biometric data (where used for identification purposes) • data concerning health • data concerning a person's sex life • data concerning a person's sexual orientation.	To respond to enquiries about our funeral plan services. To make reasonable adjustments for someone who needs them. For our legal and regulatory record-keeping and compliance purposes.
Use of Artificial Intelligence (AI)	• Basic identifiers including name, surname, date of birth, age, gender • Contact details such as address, email address, telephone numbers • Nationality • Country of origin or domicile • Marital status of parents at birth and parents permanent place of living at your birth • Payment information i.e. debit / credit card details • Relationship status • Employment information including occupation, job role and description, employer • Partner's name, date of birth, address, email address and phone number • Guardian's names, addresses, dates of birth, email addresses and phone numbers • Financial assets including: • Properties owned, how they are owned and who with (including their full legal name and address if different to any previously mentioned), value of property and mortgage(s) remaining. • Bank and building society accounts, name(s) on account, value of account, how the account is held. • Information on and value of personal possessions. • Information and value of vehicles owned. • Information on and value of shares and investments owned. • Name, value and description of any partnerships or businesses owned (including agreements in place, their role in the business and anything else deemed relevant). • Information on and value of life insurance policies (including if these are written into trust and the beneficiaries). • Information on and value of pension policies (including if these are written into trust and the beneficiaries). • Information on and value of death in service benefit (including if these are written into trust and the beneficiaries).	To enhance our services, improve user experiences and streamline our operations To enhance content recommendations, fraud detection and data analysis

	• Details and value of any assets held overseas. • Health information in instances where you may lack capacity • Transcripts of phone calls • Contact information for nominated points of contact, co-executors, co-owners of the deceased person's jointly owned assets, guardians, trustees and beneficiaries including name, date of birth, address, email address, telephone numbers and relationship to the person who has died • Note: We take steps to ensure that special category data is identified and removed, including providing appropriate training to support this process.	
Social media (including customer reviews)	• Name • Username • Profile information • Comments • Messages • And any other information to choose to share publicly	To promote our products and services on our website, social media and other marketing materials
The prevention, detection, investigation or prosecution of crimes	• Names and contact information • Client accounts and records • Video recordings of public areas • Audio recordings of public areas • Video recordings of private or staff only areas • Audio recordings of private or staff only areas • Call recordings • Financial information eg for fraud prevention or detection • Location data	For our legal and regulatory record-keeping and compliance purposes.

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

Dignity With your consent, we and our Group Companies will contact you by SMS, WhatsApp, email, post, and phone about products or services which we think are relevant to you. You have a legal right to prevent your information being used for direct marketing purposes.

To allow charities to communicate with you:

We sometimes ask you if you are happy to receive marketing communications from the charities we work with (for example, they have referred you to our services or you have left the charity a gift in your will). If you agree and provide your consent, we send the charity your personal data so they can contact you directly. Where you change your mind and decide you would prefer not to be contacted by the charity, you should let them know (their communication should also contain an unsubscribe link).

Where you do not receive a prompt to ask you for your consent to share your personal data with the charity for their marketing communications, this means that Farewill have an agreement with the charity whereby we provide your personal data to them so they can contact you directly (unless you have indicated to us you do not want us to share your personal data for this reason).

To allow our charity partners to analyse and optimise their legacy campaigns and to update their supporter databases:

We will share some basic information relating to you (name, address, email address, date of birth, phone number) and gift type (if any), to allow our charity partners to assess and improve their legacy campaigns and update their supporter databases.

If you do not want your information to be used for these marketing purposes, you can opt out by calling our Customer Services Team on 0808 196 9678, or by emailing CEC.Enquiries@dignityuk.co.uk or you can write to us at: Dignity, 4-10 King Edwards Court, King Edwards Square, Sutton Coldfield, West Midlands, B73 6AP.

Lawful bases and data protection rights

Under the General Data Protection Regulation (GDPR), the UK GDPR, the Data Protection Act 2018, the Data Protection (Jersey) Law 2018, the Data Protection Authority (Jersey) 2018 Law and such other legislation as may be applicable from time to time, you have rights with regard to your personal data.

If you have provided consent for the processing of your data, you have the right to withdraw that consent at any time.

You have the right to lodge a complaint about the processing of your personal data either with us, with the Information Commissioner's Office or the relevant data protection supervisory authority either in the country/territory in which you are located and/or in the jurisdiction in which we are located and process your personal data. In the case of Jersey, the appropriate supervisory authority is the Jersey Office of the Information Commissioner. Which lawful basis we rely on may affect your data protection rights which are set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can find out more here.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can find out more here.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [You can find out more here.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can find out more here.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can find out more here.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can find out more here.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can find out more here.](#)
- **Rights related to automated decision making including profiling** - To develop and improve new products and services and identifying which may be of interest to you. To help ensure our decision controls within the application are fit for purpose. [You can find out more here.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- To improve our customer service and obtain feedback regarding our services

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Communication of funeral arrangements, where required

Our lawful bases for collecting or using personal information **for the prevention, detection, investigation or prosecution of crimes** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - In order to protect our premises, we rely on legitimate interest in order to operate CCTV.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to

anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

- We may send you marketing dependent upon the specific instructions that you have given us. We rely on a legitimate interest (when we have a business or commercial reason to use your information) to send marketing to you by post or over the phone.

Our lawful bases for collecting or using personal information for **research or archiving purposes**:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - In order to facilitate certain details for loved ones, or for example for archiving purposes.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
 - Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

- Information from the deceased set out in the will and in correspondence, notes and papers in their possession provided to us;
- Funeral comparison sites
- Information you provide during the administration;
- Information from third parties provide during the administration;
- Information from bankruptcy search providers;

- Information from register of births, deaths and marriages;
- Information from credit reference agencies;
- Information from genealogist agencies;
- Information from regulatory authorities;
- Information from CCTV footage or other recordings;
- Information from legal and/or statutory bodies or professionals (such as courts or solicitors)

How long we keep information

We will keep your personal data for as long as we need it, which for most data is usually for the time you are an active customer, plus a further 7 years. For CCTV, images are destroyed after 30 days. If you are a wills customer, for legal purposes this data can be held for up to 100 years.

We will keep your personal data for the following reasons:

- for the activities described above
- to meet our legal or regulatory obligations
- to handle any legal claims

If you would like more information on this, please contact us on the contact details at the start of this notice. For information on how to exercise your rights, please see the section above titled lawful bases and data protection rights.

Who we share information with

- Debt collection agencies
- Public authorities
- Other financial or fraud investigation authorities
- Insurance companies, brokers or other intermediaries
- Professional or legal advisors
- Emergency services
- Regulatory authorities
- External auditors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers
- Our trusted charity partners
- Professional consultants

Other third parties such as those who we use to contact you to address queries or use to market similar products or services (where we have consent) and customer relationship management systems.

Sharing information outside the UK

Your personal data may be transferred to or stored in locations outside the European Economic Area (EEA), Jersey and the UK.

We will only transfer your data when:

- we're required or permitted to by law or regulatory requirements.
- we're sharing data with a third party to support us with the management of your account.

When transferring data overseas, we make sure that suitable protection is always in place. This could be by:

- Ensuring that we transfer personal data to countries that the Information Commissioner (ICO) has confirmed provides the right levels of protection.
- Putting suitable clauses in our contracts so that organisations take the right steps to give personal data the same protection it has in the EEA, Jersey or the UK.

If you would like more information about protecting your data overseas, please visit <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/>

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us via the following methods:

- **Email:** complaint.resolutions@dignityuk.co.uk
- **Telephone:** 0800 783 7171
- **Post:** Dignity, 4-10 King Edwards Court, King Edwards Square, Sutton Coldfield, West Midlands, B73 6AP

For individuals in the UK, if you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the Information Commissioner.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

For individuals in Jersey, if you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the Jersey Office of the Information Commissioner.

The Jersey Office of the Information Commissioner address: Jersey Office of the Information Commissioner, 2nd Floor, 5 Castle Street, St. Helier, Jersey, JE2 3BT

Helpline number: +44 1534 716530

Email Address: enquiries@jerseyoic.org

Website: <https://jerseyoic.org/make-a-complaint>

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Simplicity Cremations is a trading name for Dignity Funerals Limited. Dignity Funerals Limited is registered in England No. 00041598. VAT No. 486 6081 14. Registered office is: 4 King Edwards Court, King Edwards Square, Sutton Coldfield B73 6AP. Dignity Funerals Limited is authorised and regulated by the Financial Conduct Authority under Firm Reference Number 967130.