

Privacy Notice – Durdle Door Holiday Park Customers

1. Who we are

Data Controller:

The data controller is the relevant Lulworth Estate company providing holiday accommodation, operating the holiday park, administering ownership and tenancy agreements or providing relevant services. References to 'The Lulworth Estate' refer collectively to the Lulworth Estate group of companies and associated entities.

Data Protection Contact:

The Lulworth Estate has not appointed a statutory Data Protection Officer. Data protection matters are managed through our Data Protection Contact at:

Email: gdpr@lulworth.com

If you have any questions regarding the processing of your personal data or wish to exercise your rights, please contact us using the above email address.

If you believe your personal data has been compromised or misused please contact us immediately using the details above.

Responsible Owner: Holiday Park General Manager

2. Purpose of this notice

This notice explains how we collect and use personal data relating to:

- Holiday accommodation guests.
- Camping and touring customers.
- Owners of caravans, lodges or homes located on the park.
- Family members, guests and authorised occupiers associated with bookings or ownership agreements.
- Visitors to the park where personal data is collected.

This notice applies to individuals associated with bookings, ownership and tenancy agreements, pitch licences and authorised occupancies where their personal data is processed by us.

3. What personal data we collect

We may collect:

- Name, postal address, email address and telephone number.
- Date of birth and nationality where required.
- Vehicle registration details.
- Booking and occupancy records.
- Pitch licence information
- Ownership and pitch licence records.
- Payment and transaction information.
- Identification documents where required.
- Utility account information and consumption records where applicable.
- Insurance information where required.
- Records relating to maintenance, rules, health and safety or compliance matters.
- Records relating to rule enforcement or compliance investigations
- Correspondence and enquiries.
- Complaint and incident records.
- Records concerning emergency incidents or welfare concerns
- Vehicle permits and access control records.
- Accessibility requirements.
- Marketing preferences.
- Emergency contact details where provided.
- CCTV footage and security records.
- Details of authorised family members and guests associated with caravan ownership.
- Information relating to guests included within a booking.
- Marketing consent records where applicable

4. CCTV Processing

We may process CCTV footage for:

- Site security
- Protection of residents, guests, visitors and staff.
- Crime prevention and detection.
- Investigation of incidents and complaints.
- Protection of assets.
- Health and Safety management.

CCTV recordings are accessed only by authorised personnel and retained only for as long as necessary.

Appropriate signage is displayed throughout the holiday park to inform residents, guests and visitors that CCTV monitoring is in operation.

5. Site Access and Security

To maintain the safety and security of residents, guests, visitors and property, we may process personal data relating to vehicle access, permits, occupancy verification, visitor registration and security incidents.

Such processing is undertaken for health and safety, security, fraud prevention and site management purposes

6. How we collect your data

We collect personal data from:

- You directly.
- Online booking platforms
- Booking agents and travel partners
- Family members or authorised occupants
- Holiday park management systems
- Utility providers where relevant
- Contractors and service providers
- Internal business systems and activities.

7. Why we use your data (lawful basis)

Purpose	Lawful Basis
Booking administration	Contract
Administration of caravan ownership agreements	Contract
Customer service and enquiries	Contract
Processing payments	Contract
Management of licences and annual fees.	Contract
Regulatory compliance	Legal obligation
Health and safety management	Legal obligation
Compliance with site licence requirements	Legal obligation
CCTV monitoring	Legitimate interests
Fraud prevention	Legitimate interests
Site security, access management and enforcement of park rules and licence conditions	Legitimate interests
Investigation of breaches of rules or incidents	Legitimate interests
Complaint handling	Legitimate interests

Marketing communications	Consent
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Where you own a caravan, lodge or holiday home located on the park we process personal data to:

- Manage ownership agreements
- Administer site fees, service charges and utilities
- Maintain ownership records.
- Control access to the park
- Communicate operational, compliance and safety information.
- Arrange maintenance and repairs
- Enforce park rules and licence conditions

The lawful basis for this processing are the performance of a contract, compliance with legal obligations and our legitimate interests in operating and managing the holiday park safely and efficiently.

8. Our legitimate interests

Where we rely on legitimate interests, these include:

- Operating and managing the holiday park.
 - Administration of ownership records.
 - Management of pitch and site licences.
 - Site security and safety.
 - Fraud prevention.
 - Investigation of accidents and complaints
 - Communication with authorised occupiers and family members.
 - Protection of park infrastructure and facilities.
 - Protecting company property.
 - Business administration.
 - Risk management.
 - Defending legal claims.
 - Ensuring a safe environment for residents, guests, visitors and employees.
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9. Special category data

We do not routinely process special category personal data.

However, we may process limited special category data where necessary, including information relating to accessibility requirements, health conditions, disabilities, emergency situations, accident investigations or welfare concerns.

Such processing will only occur where an appropriate condition under Article 9 UK GDPR applies, including:

- Article 9(2)(a) – Explicit consent.
- Article 9(2)(c) – Vital interests.
- Article 9(2)(f) – Establishment, exercise or defence of legal claims.
- Article 9(2)(g) – Substantial public interest where permitted by law.

Processing is limited to what is necessary and proportionate.

10. Who we share your data with

We may share personal data with:

- Holiday park management system providers.
- Payment service providers.
- Professional advisers, insurers and auditors.
- Regulatory bodies.
- Local authorities.
- Site licence regulators.
- Law enforcement agencies where required by law,
- Utility suppliers.
- Utility management providers.
- Waste management providers where required.
- Maintenance contractors.
- Insurers.
- IT service providers.
- Occupancy and booking service providers.
- Internal departments within the Lulworth Estate.
- Emergency services where necessary.

We may also share personal data with carefully selected service providers acting on our behalf where necessary to operate the holiday park, administer bookings, process payments, meet our legal obligations or protect our legitimate interests.

11. International transfers

We do not routinely transfer data outside the UK. Where personal data is transferred outside the United Kingdom, appropriate safeguards will be implemented in accordance with UK GDPR requirements.

12. How we protect your data

We use appropriate technical and organisational measures, including:

- Restricted access (role-based permissions).
- Regular review of access permissions to management systems.
- Access controls appropriate to customer, ownership and occupancy records.
- Secure IT systems and password protection.
- CCTV management controls.
- Staff confidentiality obligations.
- Locked storage for paper records.
- Staff training on data protection.
- Secure document retention and destruction procedures.
- Audit logging where appropriate.

13. How long we keep your data

Retention periods may be extended where required by law, regulatory obligations, insurance requirements, active complaints, legal proceedings or the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Holiday booking records	Duration of stay or occupancy + 6 years
Financial records	6 years
Payment records	6 years
Customer correspondence	Up to 6 years
Complaint records	Up to 6 years
Caravan ownership records	Ownership period plus 7 years following termination or transfer of ownership.
Pitch licence and fee records	7 years.
CCTV footage	Typically, 30–90 days unless required for investigation

14. Is providing your data mandatory?

Providing certain personal data is necessary for us to manage bookings, ownership agreements, pitch licences, payments, utilities, health and safety requirements and related services.

Failure to provide required information may prevent us from providing accommodation, administering ownership arrangements, processing payments or complying with legal obligations.

15. Your rights

Standard UK GDPR rights apply:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to object
- Right to data portability
- Rights regarding automated decision-making

Where processing is based on consent, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing undertaken before consent was withdrawn.

Requests relating to your data protection rights should be directed to: GDPR@lulworth.com

16. Complaints

We encourage people to contact us first if they have concerns regarding the processing of their personal data.

You also have the right to lodge a complaint with the ICO:

- Website: www.ico.org.uk
 - Helpline: 0303 123 1113
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17. Automated decision-making

We do not make decisions relating to guests, customers, occupiers or owners based solely on automated processing. Any decisions affecting bookings, ownership arrangements or access to services are subject to appropriate human review.

18. Changes to this notice

This notice may be updated periodically to reflect changes in legislation, regulatory guidance, holiday park operations, service providers or business practices.

19. Document control

- Version: 2.0
- Owner: Holiday Park General Manager
- Review cycle: Annual

