

Privacy Notice – Health and Safety (UK GDPR)

1. Who we are

Data Controller:

The data controller responsible for processing personal data in relation to health and safety activities will be the relevant Lulworth Estate company responsible for the site, activity, incident or investigation concerned.

References in this notice 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. Responsibility for data protection compliance is managed through our designated 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: Safety Risk and Compliance

2. Purpose of this notice

This privacy notice explains how The Lulworth Estate collects, uses, stores and protects personal data in connection with health and safety management, accident reporting, incident investigations, risk management and compliance with legal obligations.

3. What personal data we collect

We may collect:

- Name, address, contact details
- Date of birth (where relevant)
- Details of incidents or accidents
- Injury and health information (including photographs where necessary)
- Health and safety investigation records
- Risk assessment information relating to individuals where necessary
- Witness statements
- CCTV images and recordings where relevant to the investigation of incidents, accidents, security or health and safety concerns.

- Correspondence relating to health and safety concerns
- Regulatory reporting information

We only collect data that is **necessary and proportionate** for health and safety purposes.

4. CCTV Processing

We may process CCTV footage for the purposes of:

- Investigating accidents and incidents
- Protecting employees, contractors and visitors
- Managing health and safety risks
- Investigating security concerns
- Protecting company property and assets

Appropriate signage is displayed at locations where CCTV monitoring operates.

5. How we collect your data

We collect personal data directly from you or from:

- Accident and incident reports
 - Witness statements
 - First aid treatment records
 - Occupational health providers
 - Emergency services
 - Medical professionals
 - CCTV systems
 - Internal investigations
 - Regulatory reporting processes
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6. Why we use your data (and lawful basis)

Purpose	Lawful Basis
Recording accidents/incidents	Legal obligation
Investigating incidents	Legal obligation / Legitimate interests
Reporting to authorities	Legal obligation
Managing safety risks	Legitimate interests

Establishing, exercising or defending legal claims	Legitimate interests/Legal obligation and Article 9(2)(f) where applicable
Reviewing CCTV footage following incidents, accidents or safety concerns	Legitimate interests / Legal obligation

7. Regulatory reporting

Where required by law, personal data may be reported to regulatory authorities, including the Health and Safety Executive (HSE), local authorities, insurers or other competent authorities.

Such reporting is undertaken only where necessary to comply with legal obligations or protect health and safety.

8. Our Legitimate interests

Where we rely on legitimate interests, these include:

- Protecting the health, safety and welfare of employees, contractors and visitors.
 - Investigating incidents and near misses.
 - Managing safety risks.
 - Complying with internal health and safety management requirements.
 - Investigating complaints and concerns.
 - Preventing serious incidents and repeat concerns.
 - Preventing fraud and false claims.
 - Defending legal claims.
 - Protecting company assets.
 - Maintaining accurate health and safety records.
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9. Special category data (health data)

Where necessary, we process special category personal data including health information, injury records, occupational health information and medical information relevant to an incident or investigation.

Processing may take place under one or more of the following conditions:

- Article 9(2)(b) – Employment, social security and social protection law.
- Article 9(2)(f) – Establishment, exercise or defence of legal claims.
- Article 9(2)(h) – Occupational health and assessment of working capacity.

Processing is limited to information that is necessary and proportionate for health and safety purposes.

10. Who we share your data with

We may share your data with:

- Health and Safety Executive (HSE)
- Local authorities
- Emergency services
- Insurers including liability insurers
- Legal advisers
- Occupational health providers
- Employers of contractors where appropriate
- External investigators
- Claims handlers
- Health and safety consultants acting on our behalf
- External auditors
- Medical practitioners
- Courts and tribunals
- Regulatory bodies.

11. International transfers

We do not routinely transfer personal 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)
 - Secure IT systems and password protection
 - Enhanced access controls for health records and accident investigations
 - Locked storage for paper records
 - Restricted access to incident reporting systems
 - Staff training on data protection
 - Regular review of access permissions
 - Secure document retention and destruction procedures
 - Audit logging where appropriate
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13. How long we keep your data

Retention periods are based upon legal obligations, regulatory requirements, industry guidance, insurance requirements and the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Accident and incident reports	6 years
Child related incidents	Until the individual reaches age 21 or longer where safeguarding, insurance or legal requirements apply
Hazardous exposure records	Up to 40 years
Records relating to legal claims and their defence	Duration of claim plus limitation period.

14. Is providing your data mandatory?

Providing certain personal data may be required in order for us to comply with health and safety legislation, investigate incidents, manage risks and fulfil legal obligations.

Failure to provide relevant information may prevent a full investigation or our ability to comply with legal responsibilities.

15. Your rights

You have the right to:

- Right of access
- Right to rectification
- Right to erasure (where applicable)
- Right to restrict processing
- Right to object
- Right to data portability (where applicable)
- 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.

To exercise your rights, contact: gdpr@lulworth.com

16. Complaints

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

You have the right to complain to the ICO:

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

We do not make decisions that have legal or similarly significant effects based solely on automated processing. Any decisions affecting individuals are subject to appropriate human review.

18. Changes to this notice

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

19. Document control

- Version: 2.0
- Owner: Safety Risk and Compliance Manager
- Review Cycle: Annual