

Privacy Notice – Holiday Cottages and guest accommodation.

1. Who we are

Data Controller:

The data controller responsible for processing personal data will be the relevant Lulworth Estate company providing holiday accommodation or related services.

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: Director of Commercial Operations

2. Purpose of this notice

This notice explains how The Lulworth Estate collects, uses, stores and protects personal data relating to holiday cottage bookings, guest stays and associated services.

3. What personal data we collect

We may collect:

- Name, address, email address and phone number.
- Booking and stay information.
- Number and names of guests.
- Information required for accessibility or special assistance requests.
- Guest arrival and departure information.
- Vehicle registration details.

- Payment and transaction information.
 - Booking amendment records.
 - Communication and correspondence.
 - Customer preferences and special requests.
 - Accessibility requirements.
 - Complaint and incident records.
 - Marketing preferences.
 - Emergency contact details where provided.
 - CCTV footage and security records.
 - Website enquiry information.
 - Marketing consent where applicable.
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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 at locations where CCTV monitoring is in operation

5. How we collect your data

We may collect personal data via:

- You directly.
 - Online booking platforms.
 - Booking agents and travel partners.
 - Guest correspondence.
 - Website enquiries.
 - Estate reception and customer service interaction.
 - Internal business systems and activities.
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6. Guest Information

Where a booking is made on behalf of other guests, the person making the booking should ensure that those individuals are aware that their personal data may be provided to The Lulworth Estate for booking administration, accommodation management, health and safety and customer service purposes.

7. Why we use your data (lawful basis)

Purpose	Lawful Basis
Business administration and record keeping	Contract
Processing payments	Contract
Customer service and enquiries	Contract
Regulatory compliance	Legal obligation
Health and safety management	Legal obligation
Operating, administering and improving holiday accommodation services	Legitimate interests
Protecting property and assets	Legitimate interests
Fraud prevention	Legitimate interests
CCTV monitoring	Legitimate interests
Maintaining guest safety and security	Legitimate interests
Handling complaints and disputes	Legitimate interests
Marketing communications	Consent

8. Our legitimate interests

Where we rely on legitimate interests, these include:

- Managing and administering bookings
- Managing guest arrivals and departures
- Maintaining accommodation standards
- Responding to customer enquiries.
- Operating and improving holiday accommodation services.
- Protecting guests, staff and property
- Protecting property and assets.
- Fraud prevention.
- Investigating complaints, incidents and disputes
- Maintaining guest safety and security.
- Handling complaints and disputes.
- Business administration and record keeping.
- Business continuity and operational planning

When relying on legitimate interests we consider and balance our business interests against the rights and freedoms of guests.

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, disabilities, health conditions, allergies, emergency situations or incidents occurring during a stay.

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 proportion

10. Who we share your data with

We may share personal data with:

- Booking management system providers.
 - Payment service providers
 - Guest communication platforms
 - IT support providers.
 - Property maintenance contractors where necessary.
 - Insurance providers.
 - Professional and legal advisers.
 - Regulatory authorities.
 - Law enforcement agencies where required by law.
 - Emergency services where necessary
 - Other Lulworth Estate companies where necessary to coordinate accommodation or provide services
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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).
 - Access controls appropriate to booking and guest records.
 - Secure IT systems and password protection.
 - CCTV management controls
 - Staff confidentiality obligations.
 - Regular review of system permissions.
 - Monitoring of access to reservation systems where appropriate.
 - Locked storage for paper records.
 - Staff training on data protection
 - Secure document retention and destruction procedures
 - Audit logging where appropriate
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13. How long we keep your data

Retention periods may be extended where required by law, insurance requirements, ongoing disputes, regulatory investigations or the need to establish, exercise or defend legal claims.

Record Type	Typical Retention
Holiday booking records	Duration of stay or occupancy + 6 years
Payment records	7 years
Customer correspondence	Up to 6 years
Complaint records	Up to 6 years
CCTV footage	Typically, 30–90 days unless required for investigation
Accessibility requests	Duration of booking plus 1 year unless required for an ongoing complaint, legal claim or accessibility-related request.

14. Is providing your data mandatory?

Providing certain personal data is necessary to administer bookings, process payments, provide accommodation services, comply with legal obligations and ensure guest safety.

Failure to provide required information may prevent us from accepting a booking, providing accommodation 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 or bookings based solely on automated processing. Any decisions affecting bookings, accommodation services or customer requests are subject to appropriate human review.

18. Changes to this notice

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

19. Document control

- Version: 2.0
- Owner: Director of Commercial Operations
- Review Cycle: Annual