

Privacy Notice – Hospitality Customers

1. Who we are

Data Controller:

The data controller responsible for processing your personal data will be the relevant Lulworth Estate company providing restaurant, café, catering, takeaway, bar or hospitality 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. 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:

- Restaurant customers
 - Café customers
 - Bar customers
 - Takeaway customers
 - Catering customers
 - Group bookings
 - Hospitality event customer
-

3. What personal data we collect

We may collect:

- Name

- Contact details
 - Booking and reservation information
 - Party size information
 - Dietary requirements
 - Allergy information
 - Accessibility requirements
 - Payment and transaction information
 - Customer preferences
 - Complaint records
 - Incident records
 - Marketing preferences
 - CCTV footage
 - Correspondence and enquiries
 - Marketing consent records
-

4. CCTV Processing

We may process CCTV footage for customer and staff safety, crime prevention and detection, investigation of incidents, protection of company assets, health and safety management and safeguarding both employees and visitors.

Appropriate signage is displayed at locations where CCTV monitoring operates.

5. Reservations and Bookings

Where reservations are made, we may process personal data to:

- Manage bookings
- Confirm attendance
- Administer waiting lists
- Accommodate accessibility requirements
- Manage customer service enquiries
- Investigate complaints

Where a booking is made on behalf of other individuals, the person making the booking should ensure those individuals are aware their information may be provided to The Lulworth Estate.

6. How we collect your data

We collect personal data from:

- You directly
- Online reservation systems
- Telephone bookings
- Walk-in enquiries
- Customer feedback
- Payment systems
- Website enquiries
- Hospitality management systems

7. Why we use your data (lawful basis)

Purpose	Lawful Basis
Managing reservations	Contract
Providing food and beverage services	Contract
Processing payments	Contract
Health and safety compliance	Legal obligation
Food safety compliance	Legal obligation
Managing allergies and dietary requirements	Legal obligation and Article 9 where applicable
Customer service	Legitimate interests
Complaint management	Legitimate interests
Fraud prevention	Legitimate interests
CCTV monitoring	Legitimate interests
Marketing communications	Consent

8. Our legitimate interests

Where we rely on legitimate interests these include:

- Operating hospitality services
- Managing bookings and reservations
- Customer service
- Site security
- Fraud prevention
- Protecting company assets
- Managing complaints
- Improving services
- Business administration
- Defending legal claims

9. Special category data

We may process limited special category personal data including:

- Allergy information
- Dietary requirements revealing religious beliefs
- Health conditions relevant to customer safety
- Accessibility requirements

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:

- Reservation platform providers
 - Payment service providers
 - Catering service providers
 - IT service providers
 - Professional advisers
 - Insurers
 - Local authorities
 - Food safety regulators
 - Emergency services where necessary
 - Law enforcement agencies where required by law
-

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 reservation systems
 - Secure IT systems and password protection
 - Staff confidentiality obligations
 - Access controls appropriate to booking records
 - Staff training on data protection
 - 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
Reservation records	3 years
Payment records	7 years
Customer correspondence	Up to 6 years
Complaint records	Up to 6 years
Allergy and dietary records	Duration of booking unless required longer for legal or safety purposes
CCTV footage	Typically 30–90 days unless required for investigation
Reservation records	3 years

13. Is providing your data mandatory?

Providing certain personal data is necessary in order for us to process reservations and refunds, manage suppliers, process payments and comply with legal obligations.

Failure to provide required information may prevent us from providing reservations, delivering or accepting returns of goods or services or complying with legal obligations.

14. 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

15. 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
-

16. Automated decision-making

We do not make decisions relating to customers, sales, refunds or suppliers based solely on automated processing. Any decisions affecting business operations or services are subject to appropriate human review.

17. Changes to this notice

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

18. Document control

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

