

Privacy Notice – Retail Customers and Online shop customers

1. Who we are

Data Controller:

The data controller responsible for processing your personal data will be the relevant Lulworth Estate company operating the retail outlet, gift shop, online shop or associated retail service.

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:

- Retail customers
 - Gift shop customers
 - Online shop customers
 - Gift voucher purchasers and recipients
 - Product enquiry customers
 - Refund and returns customers
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3. What personal data we collect

We may collect:

- Name
 - Postal address
 - Delivery address
 - Email address
 - Telephone number
 - Order information
 - Product purchase history
 - Payment and transaction information
 - Refund and returns records
 - Gift voucher information
 - Customer correspondence
 - Marketing preferences
 - Website account details
 - Delivery and fulfilment records
 - CCTV footage
 - Fraud prevention information
 - Marketing consent records
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4. CCTV Processing

We may process CCTV footage for store security, crime prevention and detection, staff and visitor safety, investigation of incidents, protection of stock and company assets, fraud prevention and safeguarding both employees and visitors.

Appropriate signage is displayed at locations where CCTV monitoring operates.

5. Online Shopping

Where purchases are made through our website or online platforms, personal data may be processed to;

- Create and manage customer accounts
 - Process orders
 - Arrange delivery
 - Manage returns and refunds
 - Prevent fraud
 - Provide customer support
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6. How we collect your data

We collect personal data from:

- In-store purchases
- Online purchases
- Website accounts
- Customer enquiries
- Telephone orders
- Delivery providers
- Payment providers
- Returns and refund requests
- Internal business systems

7. Why we use your data (lawful basis)

Purpose	Lawful Basis
Processing purchases	Contract
Delivering orders	Contract
Customer support	Contract
Financial record keeping	Legal obligation
Product safety obligations	Legal obligation
Fraud prevention	Legitimate interests
Retail security	Legitimate interests
CCTV monitoring	Legitimate interests
Business administration	Legitimate interests
Marketing communications	Consent

8. Our legitimate interests

Where we rely on legitimate interests, these include:

- Operating retail services
 - Managing customer enquiries
 - Fraud prevention
 - Inventory and stock control
 - Protecting staff and visitors
 - Protecting company assets
 - Improving customer service
 - Managing complaints and disputes
 - Defending legal claims
 - Business administration
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9. Special category data

We do not routinely process special category personal data relating to retail activities.

In limited circumstances we may process information relating to disabilities, accessibility needs, complaints, accidents or legal matters where necessary. Such processing will only occur where an appropriate condition under Article 9 UK GDPR applies.

10. Who we share your data with

We may share personal data with:

- Payment service providers
 - Delivery and courier companies
 - Online retail platform providers
 - IT service providers
 - Professional advisers
 - Insurers
 - Regulatory authorities
 - Law enforcement agencies where required by law
 - Other Lulworth Estate companies where necessary to fulfil orders or provide services
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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:

- Secure payment processing
- Restricted access (role-based permissions)
- Secure IT systems and password protection
- Access controls for customer accounts
- Staff confidentiality obligations
- Regular review of permissions
- Secure data 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
Order records	7 years
Payment records	7 years
Refund records	7 years
Customer correspondence	Up to 6 years
Product enquiries	3 years
Gift voucher 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 in order for us to process purchases and refunds, manage suppliers, process payments and comply with legal obligations.

Failure to provide required information may prevent us from engaging in providing, delivering or accepting returns of goods or services 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

17. 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.

18. Changes to this notice

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

19. Document control

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