

Privacy Notice – Suppliers, Contractors and Business Contacts

1. Who we are

Data Controller:

The data controller responsible for processing your personal data will be the relevant Lulworth Estate company engaging with you as a supplier, contractor, consultant, adviser, service provider, business contact or trade account holder.

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: Finance Director

2. Purpose of this notice

This notice explains how The Lulworth Estate collects, uses, stores and protects personal data relating to:

- Suppliers
- Contractors
- Consultants
- Professional advisers
- Service providers
- Company representatives
- Trade account holders
- Directors, partners and sole traders
- Prospective suppliers
- Business contacts

3. What personal data we collect

We may collect:

- Names and contact details
- Business addresses
- Job titles
- Company information
- Bank account details
- Tax and VAT information
- Supplier account records
- Invoices and payment records
- Purchase order information
- Contract information
- Insurance information
- Professional qualifications and accreditations
- Health and safety records relating to contractor activities
- Vehicle registration details
- Site access records
- CCTV footage where applicable
- Correspondence and communications
- Complaint and dispute records
- Due diligence and verification information
- Records relating to supplier performance

4. CCTV Processing

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

Appropriate signage is displayed at locations where CCTV monitoring operates.

5. How we collect your data

We collect personal data from:

- You directly
- Supplier onboarding processes
- Contracts and quotations
- Purchase orders

- Credit reference providers where appropriate
- Publicly available business records
- Professional advisers
- Internal business systems
- Site access systems
- Health and safety processes

6. Why we use your data (lawful basis)

Purpose	Lawful Basis
Supplier onboarding and management	Contract
Purchasing goods and services	Contract
Processing payments	Contract
Maintaining accounting records	Legal obligation
Taxation and financial compliance	Legal obligation
Health and safety management	Legal obligation
Supplier due diligence	Legitimate interests
Business relationship management	Legitimate interests
Site access and security	Legitimate interests
Establishing, exercising or defending legal claims	Legitimate interests and legal obligation where applicable

7. Our legitimate interests

Where we rely on legitimate interests, these include:

- Effective procurement and supplier management
 - Business administration
 - Financial control
 - Supplier performance monitoring
 - Information security
 - Fraud prevention
 - Health and safety management
 - Protection of company assets
 - Verification of supplier capability
 - Maintaining accurate records
 - Legal compliance and risk management
 - Defending legal claims
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8. Special category data

We do not routinely process special category personal data relating to suppliers or business contacts.

In limited circumstances we may process information relating to:

- Health conditions
- Disabilities
- Accessibility requirements
- Occupational health matters
- Accident or incident investigations

Such processing will only occur where an appropriate condition under Article 9 UK GDPR applies.

9. Who we share your data with

We may share personal data with:

- Accountants and auditors
 - Banks and payment providers
 - Professional advisers
 - Insurers
 - Legal advisers
 - Regulatory authorities
 - HM Revenue & Customs
 - Health and safety advisers
 - IT service providers
 - Group companies within The Lulworth Estate
 - Law enforcement agencies where required by law
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10. 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

11. How we protect your data

We use appropriate technical and organisational measures including:

- Restricted access (role-based permissions)
- Secure IT systems and password protection
- Financial system access controls
- Staff confidentiality obligations
- Regular review of permissions
- Secure document retention and destruction procedures
- Audit logging where appropriate

12. 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
Supplier records	Duration of relationship + 7 years
Financial records	7 years
Contracts	Contract term plus 6 years
Due diligence records	6 years
Health and safety records	In accordance with legal requirements
CCTV footage	Typically 30–90 days unless required for investigation

13. Is providing your data mandatory?

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

Failure to provide required information may prevent us from engaging in business, delivering 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
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16. Automated decision-making

We do not make decisions relating to customers, businesses, suppliers or contractors 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 Finance
- Review cycle: Annual