

Privacy Notice – Property Management, Residential and Commercial Lettings

1. Who we are

Data Controller:

The data controller responsible for processing your personal data will be the relevant Lulworth Estate company acting as landlord, property manager or service provider in relation to the property 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 overseen through our designated Data Protection Contact.

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: Built Environment Director

2. Purpose of this notice

This notice explains how we use personal data relating to:

- Residential tenants
 - Commercial tenants
 - Prospective tenants
 - Guarantors
 - Occupiers
 - Property applicants
 - Former tenants and occupiers, where personal data is retained in accordance with legal, regulatory or contractual obligations.
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3. What personal data we collect

We may collect:

- Names and contact details
 - Addresses
 - Dates of birth
 - Tenancy information
 - Tenancy deposit information
 - Financial information
 - Bank details
 - Rent payment records
 - Credit reference information
 - Employment information
 - Right-to-rent documentation
 - Identification documents
 - Property inspection records
 - Records relating to tenancy breaches or enforcement action
 - Utility account information where relevant
 - Emergency contact details
 - Vehicle registration details
 - Maintenance records
 - Complaint records
 - CCTV footage where applicable
 - Correspondence records
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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 systems are in operation

5. How we collect your data

We collect data from:

- You directly .
- Tenant applications.
- Letting agents.
- Credit reference agencies.
- Guarantors.
- Employers and referees

- Local authorities.
 - Utility providers.
 - Contractors and maintenance providers.
 - Deposit protection schemes.
 - Reference providers.
 - Internal business systems and property management activities.
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6. Property Access

Personal data may be processed when arranging inspections, repairs, maintenance visits, compliance checks, contractor attendance, tenancy audits, property viewings and emergency access where necessary.

Records relating to access arrangements, communications and attendance may be maintained to support property management, health and safety, legal compliance and dispute resolution.

7. Tenancy Applications

Where individuals apply for a residential or commercial tenancy, we may undertake checks relating to identity, affordability, references, right-to-rent requirements and suitability for the property.

Such checks are conducted only where necessary and proportionate and in accordance with applicable legal requirements.

8. Contractors and maintenance

Where repairs, inspections or maintenance works are required, relevant personal data may be shared with contractors, tradespeople and service providers where necessary to arrange access, complete works, comply with health and safety obligations or manage the property.

Only information necessary for those purposes will be shared.

9. Why we use your data (lawful basis)

Purpose	Lawful Basis
Creating and managing tenancy agreements	Contract
Rent collection and processing	Contract

Property management	Contract
Maintenance, repairs and improvements	Contract
Compliance with landlord obligations	Legal Obligation
Right to Rent checks	Legal Obligation
Health and safety compliance	Legal Obligation
Establishing, exercising or defending legal rights and claims	Legal Obligation, Legitimate interest
Assessing applications	Legitimate Interests
Debt recovery	Legitimate Interests

10. Our legitimate interests

Where we rely on legitimate interests, these include:

- Effective property and tenancy management.
 - Business administration.
 - Information security.
 - Fraud prevention.
 - Management of tenancy disputes.
 - Administration of deposits.
 - Health and safety management.
 - Property maintenance and improvement.
 - Management of property access arrangements.
 - Protection of company assets.
 - Recovery of unpaid sums.
 - Legal compliance and risk management.
 - Defending legal claims.
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11. Special category data

We may occasionally process special category personal data where necessary to fulfil our obligations as landlord or property manager.

This may include information relating to:

- Disabilities
- Accessibility requirements
- Medical conditions requiring adjustments
- Vulnerability information
- Health and safety requirements

Such processing is undertaken only where an appropriate condition under Article 9 UK GDPR applies, including:

- Article 9(2)(a) – Explicit consent.
- Article 9(2)(b) – Employment, social security and social protection law where applicable.
- Article 9(2)(f) – Establishment, exercise or defence of legal claims.
- Article 9(2)(h) – Health or social care purposes.

Processing is limited to information that is necessary and proportionate.

12. Who we share your data with

We may share data with:

- Letting agents.
- Solicitors.
- Surveyors.
- Deposit protection schemes.
- Contractors.
- Tradespeople.
- Maintenance providers.
- Credit reference agencies.
- Mortgage lenders where necessary.
- Utility suppliers.
- Local authorities.
- Insurers.
- Debt recovery providers.
- Regulatory bodies.
- Legal advisors.
- Law enforcement agencies where required by law.

We may also share personal data with carefully selected service providers acting on our behalf where this is necessary to operate our business, administer tenancy agreements, provide maintenance or services, meet legal obligations or protect our legitimate interests.

13. 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.

14. How we protect your data

We use appropriate technical and organisational measures, including:

- Restricted access (role-based permissions)
- Access controls appropriate to tenancy and financial records
- Secure IT systems and password protection
- Locked storage for paper records
- Regular review of access permissions
- Staff training on data protection
- Secure sharing arrangements with agents and contractors
- Secure document retention and destruction procedures
- Audit logging where appropriate

15. How long we keep your data

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

Record Type	Typical Retention
Tenancy files	Tenancy end plus 6 years following termination of the tenancy
Rent records	7 years
Application records (unsuccessful)	12 months
Right-to-rent records	Tenancy end + 1 year
Property maintenance records	6 years
Complaint records	6 years
CCTV footage	Typically, 30–90 days unless required for investigation

16. Is providing your data mandatory?

Providing certain personal data is necessary in order to assess tenancy applications, enter into tenancy agreements, administer properties, process payments and comply with legal obligations.

Failure to provide required information may prevent us from offering a tenancy, managing the property effectively or complying with legal requirements.

17. 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

18. 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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19. Automated decision-making

We do not make decisions relating to tenants, applicants, occupiers or guarantors based solely on automated processing. Any decisions relating to tenancy applications, property management or related services are subject to appropriate human review.

20. Changes to this notice

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

21. Document control

- Version: 2.0
- Owner: Built Environment Director.
- Review Cycle: Annual