

Privacy Notice – Website Users.

1. Who we are

Data Controller:

The data controller responsible for processing personal data collected through The Lulworth Estate websites will be the relevant Lulworth Estate company operating the website, online service, booking platform or digital service 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 managed 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: Information Technology Department

2. Purpose of this notice

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

- Visit our websites.
 - Use online services.
 - Submit enquiries.
 - Complete online forms.
 - Create online accounts.
 - Make bookings or purchases.
 - Subscribe to newsletters.
 - Download information.
 - Use website features and applications.
 - Interact with website content.
 - Contact us through digital channels
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3. What personal data we collect

Our websites may use cookies, pixels, tags and similar technologies to:

- Ensure websites function correctly.
- Improve website performance.
- Remember user preferences.
- Analyse visitor behaviour.
- Measure website usage.
- Support security functions.
- Improve user experience.
- Deliver and measure marketing activity where permitted.

Further information regarding the cookies used on our websites may be provided through our Cookie Notice or Cookie Preferences Centre where applicable.

4. Website Analytics

We may use website analytics services to help us understand how visitors interact with our websites. Analytics information may include:

- Pages viewed.
- Navigation activity.
- Device information.
- Browser information.
- Approximate location information.
- Referring websites.
- Website performance information.

Where required by law, analytics technologies will only be used with appropriate consent

5. Online forms and enquiries

Where you complete a website form, submit an enquiry or request information, we will process the personal data you provide in order to respond to your request and administer the relevant service.

Information submitted through website forms may be shared with relevant departments within The Lulworth Estate where necessary to respond to your enquiry or provide the requested service.

6. Online accounts, bookings and purchases

Where our websites provide booking, accommodation, ticketing, retail, hospitality or account facilities, personal data may be processed in order to:

- Administer accounts.
- Manage bookings.
- Process purchases.
- Provide customer support.
- Process payments.
- Communicate with customers.
- Prevent and detect fraud.
- Maintain security of services.

Additional privacy notices may apply to specific services such as accommodation bookings, retail purchases, hospitality services, events, marketing activities and WiFi services

7. How we collect your data

We may collect personal data from:

- Website enquiry forms.
 - Newsletter sign-up forms.
 - Account registration forms.
 - Booking systems.
 - Online shops.
 - Customer support enquiries.
 - Cookies and similar technologies.
 - Website analytics tools.
 - Social media integrations.
 - Payment service providers.
 - Advertising and marketing services.
 - Customer interactions with our digital services.
 - Internal business systems.
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8. Why we use your data (lawful basis)

Purpose	Lawful Basis
Operating and maintaining our websites	Legitimate Interests
Responding to enquiries	Legitimate Interests
Managing online accounts	Contract

Processing bookings and purchases	Contract
Providing online services	Contract
Website security and monitoring	Legitimate Interests
Fraud prevention	Legitimate Interests
Managing cookies and preferences	Consent where required by law
Website analytics and performance monitoring	Consent where required by law, otherwise Legitimate Interests
Compliance with legal obligations	Legal Obligation
Establishing, exercising or defending legal claims	Legitimate Interests and Legal Obligation where applicable
Marketing communications	Consent, except where an alternative lawful basis and PECR exemption applies

9. Our legitimate interests

Where we rely on legitimate interests, these include:

- Operating and improving our websites.
- Maintaining the security of digital services.
- Preventing fraud and misuse.
- Protecting users and systems.
- Responding to enquiries.
- Understanding how visitors use our websites.
- Improving customer experience.
- Developing and enhancing digital services.
- Maintaining accurate records.
- Protecting business operations.
- Defending legal claims.
- Ensuring business continuity.

10. Website Security and Monitoring

To maintain the security, integrity and availability of our websites and online services, we may monitor website activity, user interactions, technical logs and security events.

Monitoring is undertaken only where necessary for:

- Information security.
- Fraud prevention.

- Detection of unauthorised access.
- Service administration.
- Troubleshooting.
- Protection of systems and users.
- Compliance with legal obligations.

We do not routinely monitor the content of private communications submitted through our websites except where necessary for the administration of services, investigation of incidents or compliance with legal obligations.

11. Special category data

We do not routinely collect or process special category personal data through our websites.

Where special category data is provided through enquiries, booking requests, accessibility requests, complaints, applications or other website interactions, we will only process such information where an appropriate condition under Article 9 UK GDPR applies and suitable safeguards are in place.

Processing is limited to what is necessary and proportionate

12. Who we share your data with

We may share personal data with:

- Website hosting providers.
- IT service providers.
- Cybersecurity providers.
- Website development partners.
- Analytics providers.
- Cookie management providers.
- CRM providers.
- Marketing platform providers.
- Booking platform providers.
- Payment service providers.
- Professional advisers.
- Legal advisers.
- Regulatory authorities.
- Law enforcement agencies where required by law.
- Other Lulworth Estate companies where necessary to provide services or administer enquiries.

14. 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.

15. How we protect your data

We use appropriate technical and organisational measures, including:

- Firewalls.
 - Network monitoring.
 - Encryption where appropriate.
 - Restricted access (role-based permissions).
 - Secure IT systems and password protection.
 - Security patch management.
 - Intrusion detection and monitoring.
 - Multifactor authentication where appropriate.
 - Staff training on data protection.
 - Regular review of user permissions.
 - Secure document retention and destruction procedures.
 - Audit logging where appropriate
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16. How long we keep your data

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

Record Type	Retention
Website enquiries	3 years
Contact form submissions	3 years
Website account records	Duration of account plus 2 years
Marketing preferences	Duration of preference plus 6 years
Marketing consent records	Duration of consent plus 6 years
Website security logs	12 months
Technical support records	3 years

17. Is providing your data mandatory?

Providing certain personal data may be necessary to access website services, create accounts, make bookings, submit enquiries, process purchases or receive communications.

Failure to provide required information may prevent us from providing the requested service or responding to your enquiry.

18. 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

You have the right to object to the processing of your personal data for direct marketing purposes at any time.

Where processing is based on consent, you may withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

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

19. 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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20. Automated decision-making

We do not make decisions producing legal or similarly significant effects based solely on automated processing.

We may use website analytics, security monitoring tools, audience measurement technologies and website functionality tools to improve services and protect our systems, but these activities do not result in solely automated decision-making with legal or similarly significant effects.

21. Changes to this notice

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

22. Document control

- Version: 2.0
- Owner: Information Technology Department
- Review Cycle: Annual