

Privacy Notice – Marketing and Social Media.

1. Who we are

Data Controller:

The data controller responsible for processing your personal data will be the relevant Lulworth Estate company providing services, managing communications or operating the relevant website, social media account or marketing activity.

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: Director of Visitor Experience

2. Purpose of this notice

This notice explains how The Lulworth Estate collects, uses, stores and protects personal data in connection with marketing activities, customer communications, website enquiries, social media engagement, competitions, promotional activities and customer relationship management.

3. What personal data we collect

We may collect:

- Name
- Email address
- Telephone number
- Postal address
- Social media usernames and profile information
- Subscriber engagement information
- Email interaction data
- Marketing preferences

- Marketing consent records
 - Website analytics data
 - Cookie identifiers
 - Audience segmentation information
 - IP addresses
 - Communications and correspondence
 - Competition entry information
 - Photography and video images where consent has been provided
 - Preferences relating to products services and activities
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4. Social Media

We operate accounts on various social media platforms including Facebook, Instagram, LinkedIn, X, YouTube and other platforms where applicable.

When individuals engage with our social media content, personal data may be processed by both The Lulworth Estate and the relevant social media provider.

Those providers may process personal data for their own purposes, including advertising, analytics, profiling and service improvement. Individuals should consult the privacy notices of the relevant social media platforms for further information.

5. Photography and Promotional Media

Photographs and video recordings may be used in marketing materials, social media content, promotional campaigns, publications, websites and historical records.

Where consent is required, individuals will be given the opportunity to provide or withhold consent and may withdraw consent at any time.

Where images are used under a lawful basis other than consent, appropriate safeguards will be applied.

6. How we collect your data

We collect data via:

- Website contact forms.
- Newsletter sign-up forms.
- Event registrations.
- Competition and giveaway entry.

- Customer surveys and feedback forms.
- Social media engagement, messages and comments.
- Publicly available social media content.
- Publicly available business information.
- Customer support enquiries.
- Website and online tracking.
- Online advertising services.
- Cookies and similar technologies.
- Email marketing activities.
- Third party sources.
- Mobile applications.
- In person activities.

7. Why we use your data (lawful basis)

Purpose	Lawful Basis
Responding to enquiries	Legitimate Interests
Sending marketing communications	Consent, except where an alternative lawful basis and a PECR exemption (such as soft opt-in) applies.
Managing social media accounts	Legitimate Interests
Website analytics and website performance monitoring	Consent where required by law, otherwise Legitimate Interests
Competition administration	Contract
Customer relationship management	Legitimate Interests
Promoting Estate activities	Legitimate Interests
Managing unsubscribes	Legal Obligation
Growing visitor engagement	Legitimate interests
Protecting brand reputation	Legitimate interests
Improving services	Legitimate interests

8. Our legitimate interests

Where we rely on legitimate interests, these include:

- Promoting Estate businesses and activities
- Understanding customer interests
- Improving services
- Understanding customer engagement
- Growing visitor engagement

- Managing communications
 - Protecting brand reputation
 - Developing and promoting Estate services
 - Measuring campaign effectiveness
 - Maintaining accurate marketing records
 - Managing customer preferences and suppressions
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9. Direct Marketing

Where permitted by law, we may send marketing communications regarding our services, events, attractions, accommodation or other activities.

Individuals may opt out of marketing communications at any time by using unsubscribe facilities included within communications or by contacting us at gdpr@lulworth.com.

We maintain suppression records to ensure marketing preferences are respected.

10. Competitions and Giveaways

Where individuals participate in competitions, prize draws or promotional campaigns, personal data will be processed for the administration of the promotion, selection of winners, prize fulfilment and compliance with legal obligations.

Information may be published where required by promotional rules or applicable law

11. Cookies and analytics

We do not routinely collect or process special category personal data for marketing purposes.

Where special category data is provided or collected in exceptional circumstances, we will only process such information where an appropriate condition under Article 9 UK GDPR applies and suitable safeguards are in place.

12. Special category data

Typically no special category data is collected or processed.

We may process sensitive data where required by law or in exceptional circumstances. Such processing is limited and legally justified.

13. Who we share your data with

We may share data with:

- Email marketing providers
 - Website hosting providers
 - IT service partners
 - CRM providers
 - Social media platforms
 - Marketing platform providers
 - Advertising partners
 - Design and communications agencies
 - Cookie and analytics providers
 - Search engine advertising providers
 - Audience management platforms
 - Customer survey providers
 - Law enforcement agencies where required by law.
 - Regulatory authorities.
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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)
 - Access controls for marketing platforms
 - Secure IT systems and password protection
 - Locked storage for paper records
 - Staff training on data protection
 - Regular reviews of user permissions
 - Secure document retention and destruction procedures
 - Audit logging where appropriate
 - Monitoring of authorised access to customer marketing databases
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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
Marketing contacts	Until unsubscribe + 2 years
Website enquiries	3 years
Competition records	1 year
Social media correspondence	3 years
Marketing consents	Duration of consent + 6 years

17. Is providing your data mandatory?

Providing personal data may be necessary to receive marketing communications, enter competitions, subscribe to newsletters, receive event information or participate in promotional activities.

Failure to provide requested information may limit our ability to provide these services.

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

Where marketing communications are sent on the basis of consent, you may 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

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

20. Automated decision-making

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

We may use audience segmentation, analytics or marketing performance tools to better understand customer engagement, but such activities do not result in solely automated decision-making with legal or significant effects.

21. Changes to this notice

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

22. Document control

- Version: 2.0
- Owner: Director of Visitor Experience.
- Review Cycle: Annual