



Data Protection Policy

About this policy

This Privacy Policy explains what happens to any personal data that you provide to us ("the Company"), or that we collect from you whilst you visit our websites, make a booking or opt-in to receive news, offers and updates. We update this Policy from time to time so please review this Policy regularly. Last updated May 2018.

The Data controller is ("the Company"): All companies collectively known as The Lulworth Estate including: Lulworth Castle Farms; Lulworth Heritage Ltd; Lulworth Landscapes Ltd; Lulworth Leisure; The Weld 1994 Settlement; The Weld Estate A Fund; The Weld Estate Third Fund; Weld Enterprises Ltd and any other businesses operated by James Weld, Sara Weld and / or Eleanor Weld.

Controller's representative: James Weld. Data protection contact: Sue Raywood.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information. We are required under the GDPR to notify you of the information contained in this privacy notice.

Data Protection Principles

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.



What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data. In running and maintaining our website and marketing activity we may collect and process the following data about you:

- your contact details, including your name, address, telephone number and personal e-mail address
- your date of birth/age
- your gender
- social media information
- photographs (supplied by you)
- documentation uploaded/supplied by you

How do we collect your personal information?

We collect information in two ways:

Information you give us

You may provide us with information by completing forms on our website or by contacting us via email, telephone or other means. For example, when you register or 'opt-in' to receive information or make an online transaction. When you opt-in you will be asked to specify the channels you would like to be contacted i.e. post, email, text, and phone. We also collect information when you voluntarily complete customer surveys, provide feedback or participate in competitions.

Information we collect from you

Information about your use of our websites including details of your visits, pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data. Like most websites, when you visit our website(s) we also collect information about usage via cookies, and we also track user and traffic patterns; however, we do not collect personal information via cookies. More information on our use of cookies is detailed within this policy.

Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We use the information that we collect from you to provide our services to you



or to comply with a legal obligation. We will only use this information if you have agreed for us to contact you in this way and 'opted-in'.

In addition to this we may use the information for one or more of the following purposes:

- To process your enquiry, reservation or booking.
- To provide information to you that you request from us relating to our products or services.
- To market products and services which we believe would be of interest to you, and for sending out our newsletter, update and special offers. As per the GDPR 2018 legislation, we will only send you this information if you have 'opted in' to receive these updates and we will only contact you via the channels that you have agreed. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to opt out (ie stop receiving marketing communications from us), please email gdpr@lulworth.com using the subject line UNSUBSCRIBE or click on the unsubscribe link on the footer of a promotional email
- To inform you of specific changes to our website, services or goods and products.
- If you have previously purchased goods or services from us we may provide to you details of similar goods or services, or other goods and services, that you may be interested in.
- Where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests.
- Any information collected is for use by the Lulworth Estate and its employees only. Your information will never be sold or given away to third parties.
- To better tailor your user experience and personalise your repeat visits to our website.

Third party links

On occasion we include links to third parties on our websites or in our communications. Where we provide a link it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

Who has access to your personal information?

Your personal information may be shared internally within the Company, including with members of staff, if access to your personal information is necessary for the performance of their roles and you have agreed for your information to be used in that way (i.e. opted-in).

The Company may also share your personal information with third-party service providers (and their designated agents), if required.



We may also need to share your personal information with a regulator or to otherwise comply with the law. We may share your personal information with third parties where it is necessary to administer the contract we have entered into with you, where we need to comply with a legal obligation, or where it is necessary for our legitimate interests (or those of a third party).

How does the Company protect your personal information?

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed, used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from Sue Raywood by emailing gdpr@lulworth.com

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes. To manage our mailing lists we use established, industry leading providers such as MailChimp. Details of their privacy policy can be found here <https://mailchimp.com/legal/privacy/>. For events we work with EventBrite. Details of their policy can be found here https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

For how long does the Company keep your personal information?

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements.

You are free to unsubscribe or opt-out from our database at any time. To do so, either click the 'unsubscribe' link at the bottom of an email or email us using the title UNSUBSCRIBE to gdpr@lulworth.com. You will be unsubscribed within 72 hours. Your email address will be held on a



confirmation list for six months but no other communications will be sent to you.

We want to ensure we have up to date and accurate personal information about you. You can ask us to correct or remove any information you think is wrong.

Other Websites

This privacy policy applies to the use of your information for marketing purposes. If you follow links to other websites you should read their privacy policies.

Children

Consistent with the Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request personally identifiable information from anyone under the age of 13 without requesting parental consent.

Changes to our privacy policy

We monitor and review our privacy policy regularly and will publish any updates on this webpage. The privacy policy was last updated on 14th May 2018.

Subscriptions, Tracking and Cookies

We offer the following free services, which require some type of voluntary submission of personal information by users:

Electronic newsletters

The Company offers a free news updates to users sent to users who voluntarily subscribe. Users may remove themselves from this mailing list by following the "Click here to unsubscribe link" provided in every newsletter.

Share

Site users can choose to electronically forward a link to a page to someone else by clicking "Send to a friend". The site user must provide their email address, as well as that of the recipient. This information is used only in the case of transmission errors and, of course, to let the recipient know who sent the email. The information is not used for any other purpose.

Usage tracking

The Company tracks user traffic patterns throughout all of its sites. However, the Company does not correlate this information with data about individual users. The Company does break down overall usage statistics according to a user's domain name, browser type, and MIME type by reading this information from the browser string (information contained in every user's browser).

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website



analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Cookies

To comply with EU legislation that was introduced in May 2012, this section documents how this website might collect information as you browse and use it to provide a tailored service to improve your online experience.

The Company may place a text file called a "cookie" in the browser files of your computer. The cookie itself does not contain Personal Information although it will enable The Company to relate your use of this site to information that you have specifically and knowingly provided. The only personal information a cookie can contain is information you supply yourself. A cookie can't read data off your hard disk or read cookie files created by other sites. The Company uses cookies to track user traffic patterns (as described above).

You do not need to have cookies turned on to use this site. You can set your browser not to accept cookies, but if you do, you may not be able to take advantage of the personalised features enjoyed by other visitors to our site such as adding properties to your favourite list.

Cookies for site functionality

Google Analytics

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

For information on the cookies used by Google Analytics, please visit <https://support.google.com/analytics/answer/6004245>

Cookies for relevant advertising



Google AdSense

We use cookies from Google AdSense, to present you with adverts that may be based on the content you visit the most on our websites. The cookies show us where you saw the advert; help us measure the effectiveness of our advertising campaigns; and limit the number of times you see an advert.

To control these Google Ads, please visit <https://adssettings.google.com/anonymous>

Your rights in connection with your personal information

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed of your personal information changes, The Company cannot be held responsible for any errors in your personal information in this regard unless you have notified the Company of the relevant change.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact Sue Raywood on gdpr@lulworth.com. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to



receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact gdpr@lulworth.com. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

Changes to this privacy notice

The Company reserves the right to update or amend this privacy notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information.

Contact

If you have any questions about this privacy notice or how we handle your personal information, please contact Sue Raywood, The Estate Office, Lulworth Castle, Wareham; BH20 5QS; gdpr@lulworth.com.

Your consent

By using this website and opting-in to receive communications, you consent to the collection and use of your personal information by the Company. If the Company decided to change its privacy policy, we will post those changes on this page so that you are always aware of what information is collected, how it is used, and under what circumstances it may be disclosed.