



GDPR Privacy Notice for Holiday Cottages

Data controller (“the Company”): All companies collectively known as The Lulworth Estate including:

Lulworth Castle Farms; Lulworth Heritage Ltd; Lulworth Landscapes Ltd; Lulworth Leisure; The Trustees of the Weld 1994 Settlement; The Trustees of the Weld Estate; 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

Holiday Cottage Manager: Karen Harper

Introduction

The Company collects and processes personal information, or personal data, relating to its clients to manage their private hire booking. This personal information may be held by the Company on paper or in electronic format.

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 both during and after your hire of Lulworth Holiday Cottages and associated services. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all current and former clients, and suppliers. It is non-contractual and does not form part of any contract for services.

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, i.e. where all identifying particulars have been removed. There are also "special categories" of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

The Company collects, uses and processes a range of personal information about you. This includes:

- your contact details, including your name, address, telephone number, personal e-mail address and car registration
- the details of your cottage rental agreement and any other associated service
- your bank or credit card details for purposes of paying cottage rental fee and any other associated service fees

How do we collect your personal information?

The Company may collect personal information from online forms which you have chosen to submit voluntarily and include an opt in box for future correspondence. We may collect details over the phone if you have called to enquire about our Cottages and should you wish to book a Cottage you will be asked to complete a booking form which acknowledged consent to the Terms and Conditions and has an opt in box for future correspondence.

Your personal information may be stored on hand written enquiry forms which are locked away and securely shredded after 3 weeks. Your booking form is countersigned, a scan copy saved in your personal stay file on our password protected private network and the original sent back to you with confirmation of your booking. Your details are entered into our bookings' management system which is password protected by ourselves and the Camp Manager software providers.

If you pay your hire fees over the phone a copy of the invoice and your credit card receipt is kept in the Lulworth Estate Office, a security alarmed building, until six months after your hire and is then securely shredded.

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 will use your personal information in one or more of the following circumstances:

- Where we need to contact you to discuss the details of your cottage stay
- If you have asked for information on ancillary services such as weddings or group activities we may pass your email address to the relevant company within the Lulworth Estate but never to a third party

We may also occasionally use your personal information where we need to protect your vital interests (or someone else's vital interests).

We need all the types of personal information listed under *"What types of personal information do we collect about you?"* primarily to enable us to perform our contract with you and to enable us to comply with our legal obligations. The purposes for which we are processing, or will process, your information is to enable us to register your cottage and contact you about it.

What if you fail to provide personal information?

If you fail to provide certain personal information when requested or required, we may not be able to confirm your cottage rental.

Why and how do we use your sensitive personal information?

We do not collect sensitive personal data (such as racial or ethnic origin, age, political opinions or sexual orientation). In order to tailor our services to you we may take note of some sensitive data if you freely offer this information ie young children that require age related equipment. As with all data, it is entirely up to you to decide whether or not you are happy to provide this information.

Change of purpose

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your personal information for the new purpose and we will provide you with any relevant further information. We may also issue a new privacy notice to you.

Who has access to your personal information?

Your personal information is accessible within the Company to employees of The Lulworth Estate for the management of your booking with us.

The Company may also share your personal information with third-party service providers with your permission (and their designated agents), including:

- Lulworth Leisure
- Lulworth Outdoors
- Weld Enterprises

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).

You are entitled to ask what personal information we hold about you and can do so by emailing gdpr@lulworth.com

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 or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, other third parties who have a business need to know in order to perform their job duties and responsibilities.

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 booking procedures we use an established, industry leading provider, currently Camp Manager. Details of their privacy policy can be found here <https://www.campmanager.com/Privacy-Policy/>

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 private contract with you.

The Company will generally hold your personal information for the duration of your contractual agreement with us and electronically for 6 years after as a record in case of arising issues.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

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 if your personal information changes, e.g. you change your home address, during your contractual relationship with the Company so that our records can be updated. 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 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.

Transferring personal information outside the European Economic Area

The Company will not transfer your personal information to countries outside the European Economic Area.

Automated decision making

Automated decision making occurs when an electronic system uses your personal information to make a decision without human intervention; we do not use these systems.

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. We will update the privacy notice when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

Contact

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