

PRIVACY POLICY

This is the Privacy Policy of Campspace B.V. based at Hendrik Figeeweg1, Hall 2, 2031 BJ Haarlem, the Netherlands ('Campspace', 'we', 'us'). Campspace [and its affiliate companies] respects your privacy and ensures that your Personal Data are handled with utmost care.

This Privacy Policy aims to explain in a simple and transparent way what Personal Data we gather about you and how we process it.

Undefined terms in this Privacy Policy have the same definition as in our Terms and Conditions <https://campspace.com/en/terms-and-conditions>.

By accessing, using and browsing our Website and Services you acknowledge and agree to have read, understand and agreed to this Privacy Policy. If you do not agree to any part of this Privacy Policy, then we cannot provide the Services to you, and you should stop accessing and/or using the Website and Services and deactivate your Account.

In this Privacy Policy 'Personal Data' shall refer to any information that tells us something about you or that we can link to you. Personal Data does not include data that has been made anonymous. The term 'processing' shall refer to any activity we can do with the Personal Data, such as collecting, adjusting, using, transferring or deleting.

Campspace is the controller and is therefore responsible for the processing of your Personal Data. Exceptions are outlined in this Privacy Policy.

Which personal data does Campspace process from whom?

Hosts

- Name of the business and/or the natural person;
- Accountname;
- (mobile) telephone number;
- e-mail address
- (billing) address ;
- addresses of the Listings;
- any business relevant information such as the registration number in the Chamber of Commerce;
- information with regard to invoicing and collecting payments;
- any generated content by the Host, such as descriptions, messages, photographs and comments with regard to the Camping Spots and Listings;
- information about your activities in connection with our Website or Services, such as: friend connections, references, interactions between you and other Users;
- data regarding to booked Camping Spots (instant bookings and bookings on request);
- IP address of your device, device-specific information and log information when you visit our Website;

- location information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Website or Services or specific features of the Website or Services). If you access the Website or Services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this);
- browser type when you visit our Website;
- cookies and similar techniques as described in our Cookie Policy;
- Personal Data deferred from your social media accounts.

Guests

- name;
- Accountname;
- (mobile) telephone number;
- e-mail address;
- ZIP code and country of origin and/or residence;
- any generated content by the Guest such as descriptions, messages, reviews, photographs and comments;
- information about your activities in connection with our Website or Services, such as: friend connections, references, interactions between you and other Users;
- travel- and booking history and related payments hereto (we will never process you bank account details);
- IP address of your device, device-specific information and log information when you visit our Website;
- location information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Website or Services or specific features of the Website or Services). If you access the Website or Services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this);
- browser type when you visit our Website;
- cookies and similar techniques as described in our Cookie Policy;
- Personal Data deferred from your social media accounts.

Third parties who have not created an Account on our Website

Campspace may process personal data of third parties, such as persons who are in contact with us or of whom personal data can be found in our records (i.e. persons who create an Account, have contact with us or visit our Website).

- name;
- (mobile) telephone number;
- e-mail address;
- IP address of your device, device-specific information and log information when you visit our Website;

- location information (e.g. IP address, zip code) and more specific information (e.g. GPS-based functionality on mobile devices used to access the Website or Services or specific features of the Website or Services). If you access the Website or Services through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this);
- browser type when you visit our Website;
- cookies and similar techniques as described in our Cookie Policy
- Personal Data deferred from your social media accounts.

Grounds and purposes for processing of your Personal Data

We only process your Personal Data based on one of more of the following legal grounds and for the following purposes:

1. with your consent;
 - To improve our Website and Services.
 - For marketing activities.
 - To link your Account to one of more of your social media accounts.
 - To share content on your social media accounts and/or to share content with your friends.
 - To send you our digital newsletter and other marketing updates.
 - To participate in contests, promotions or surveys.
 - To request our support.
 - To create Camping Spot Listings.
2. when it is necessary for the performance of a contract with you;
 - To invoice and collect payments; to provide the payment services on our Website.
 - To perform our Services.
 - To make a booking or to accept a booking.
 - To perform our obligations under the contract we have with you.
 - To request our support.
3. when it is necessary for our legitimate interests;
 - To improve our Website and Services.
 - To monitor our Website and Services, to detect and prevent fraud and other illegal or unwanted activities.
 - For marketing activities.
 - To generate statistics and anonymous data.
 - To resolve service disruptions as well as for security reasons.
4. when it is necessary for the compliance with our legal obligations;
 - To monitor our Website and Services, to detect and prevent fraud and other illegal or unwanted activities.
 - To comply with any of our legal and statutory obligations.

Third parties websites

Please note that our Website contains links to third parties websites, such as social media platforms and/or booking platforms. Campspace is not responsible and does not accept any liability with regard to these third parties websites. We suggest you read the applicable privacy policies of these third parties.

Children

Only people over 18 years can create an Account on our Website. Children need particular protection when processing their Personal Data because they may be less aware of the risks involved. We do not process any Personal Data of children below the age of 18. If you think we have processed any Personal Data of children below the age of 18, please contact us via the contact details below. We will after such notice, reasonably, end the processing of such data as soon as possible and delete all the processed Personal Data from our systems.

Sharing Personal Data with third parties

Service providers (processors)

We involve external service providers with tasks such as sales and marketing services, hosting and programming. All those service providers are processors of Personal Data on our behalf. We have chosen those service providers carefully and monitor them on a regular basis. All services providers are obligated to maintain confidentiality and to enter a data processing agreement with us, to ensure that those service providers handle Personal Data with the utmost care and to comply with all the applicable data protection laws.

Third parties (no processors or processors)

- we will share your Personal Data within our company such as with parent companies and/or our subsidiaries;
- third parties that perform (a) certain aspect(s) of your booking;
- when your request to book a Camping Spot is accepted by the Host or when you accept a Guest's request to book your Camping Spot, we will disclose your name and telephone number to the Host in case it is necessary for your booking;
- in some cases we might share your Personal Data with other Users of our Website or Services;
- social media platforms to which you have linked your Account;
- our business partners in order to show you relevant advertisements on our Website;
- third parties with who we have a collaboration for the promotion and marketing of Camping Spots and Listings in order to generate bookings or promote Campspace;
- courts, government institutions, regulators and other authorities where required by law or with your consent.

Principally, your Personal Data is transferred to other controllers only if required for the fulfilment of a contractual obligation, or if we or a third party, have a legitimate interest in the data transfer, or if you have

given your consent. Additionally, while this is unlikely, we may be required to disclose Personal Data by a court order or to comply with other legal or regulatory requirements.

If a third party qualifies as a processor it is obligated to maintain confidentially and to enter a data processing agreement with us, to ensure that those service providers handle Personal Data with the utmost care and to comply with all the applicable data protection laws.

Storage of Personal Data

We only store your Personal Data within the territory of European Economic Area (“EEA”).

Transfer of Personal Data outside the EEA

We may transfer your Personal Data to recipients located outside the EEA into so called third countries, such as the United States of America. In such cases, prior to the transfer appropriate safeguards will be adopted in order to ensure an appropriate level of data protection and/or we ask for your consent to such transfer. We aim to anonymize Personal Data as much as possible prior to the transfer of Personal Data outside the EEA.

Retention period

We will store your Personal Data as long it is necessary for the purpose, we initially required it, unless we are required by a legal obligation to store your Personal Data for a longer period. More specifically the retention periods are listed below. This list is not exhaustive.

- we will delete your Personal Data if your account has been inactive for 36 months
- we will delete your Personal Data within 7 days if you have withdrawn your consent
- we will delete your Personal Data within 7 days if you have deleted your Account

The above mentioned retention periods can be extended if statutory retention obligations apply or will apply.

Despite the retention periods, we will keep anonymous and/or statistical data that does not contain Personal Data for our own legitimate interests.

Security

We take all the appropriate technical and organizational measures that will protect the Personal Data from being destroyed, lost, modified or accessed without authorization. To ensure the security of your Personal Data, we have taken the following technical and organizational measures. This list is not exhaustive:

- Personal Data are stored within the EEA;

- wherever it is possible, two-factor authentication is enabled;
- we use encryption for the exchange of Personal Data;
- we make use of encrypted Security Shell (SSH) services;
- our systems are constantly checked for suspicious behavior via monitoring;
- we make use of firewalls and anti-virus software to protect our systems and services;
- if required by law, we will subject any new system to a data protection impact assessment;
- every new system we consider adopting must be tested in advance for the principles of privacy by design and privacy by default;
- Only authorized personnel are permitted to access Personal Data in the course of their work.

Our security measures are, pursuant to technological processes, constantly being improved.

Your rights

If your Personal Data is processed by us, you have the following privacy rights:

1. right to withdraw your consent;
You have the right to withdraw your consent at any time. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
2. right of data access;
You have the right to ask us for an overview of the Personal Data that we process of you.
3. right to rectification;
You have the right to obtain the rectification of inaccurate Personal Data;
4. right to erasure (right to be forgotten);
You have the right to request us to delete all the Personal Data we have processed about you when there are no legitimate grounds for retaining it.
5. right to restriction of processing;
You have the right to restrict the processing of your Personal Data when you dispute the accuracy of the Personal Data, the processing is unlawfully, we do not need the Personal Data any longer but you want to keep it for use in a legal claim and when you have objected to us processing your Personal Data for our own legitimate interests.
6. right to data portability;
You have the right to request us to transfer your Personal Data electronically to you in a commonly used and machine readable format.
7. right to object to processing of your Personal Data;
You have the right to object to the processing of your Personal Data if you do not agree with the way we process it.

8. right to lodge complaint with the Dutch Data Protection Authority;
You have the right to lodge a complaint with the Dutch Data Protection Authority.

In your account you can adjust your personal details. You can always contact us (via the contact details below) if you wish to exercise one of your rights. We aim to respond to your request as soon as possible, but in any case within four weeks of receiving your request. Circumstances may occur whereby we cannot give (full) effect to your request.

We only accept requests regarding your own Personal Data. To make sure we provide the relevant Personal Data to the right person, we may request additional information to make sure it is you.

Changes

We are entitled to amend our Privacy Policy at any time without giving prior notice. The most recent version of this Privacy Policy can be found on our Website via the following link: <https://campspace.com/en/privacy>. We will inform you via our Website in the event that an amendment will significantly affect your rights.

Contact us

Contact details with respect to requests and other questions you may have. Please send your requests, as well as other privacy-related questions you may have, to:

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2031 BJ Haarlem,
The Netherlands

Email : hello@campspace.com

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