

## **PRIVACY POLICY AND COOKIES OF THE WWW.CAMPINGS.COM SITE.**

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The privacy of Site users, including Customers, (“**Users**”) is important to CAMPINGS.COM. Users will find in the Site’s data protection policy (the “**Privacy Policy**”) the rules that CAMPINGS.COM applies when it processes information relating directly or indirectly to any User (the “**Personal Data**”). .

By accessing and using the Site, Users acknowledge that they are bound by the Privacy Policy, which may be modified or updated at any time without notice. Any modification or update will be posted on the Site. If the modifications to the Privacy Policy concern elements for which the consent of the Users had been required, CAMPINGS.COM will inform the Users in order to obtain their consent again.

The Privacy Policy forms a whole with the Terms and Conditions of the Site. The terms in capital letters have the definition given to them in the Terms and Conditions of the Site.

The Confidentiality Policy informs Users of the conditions of use of their Personal Data, by CAMPINGS.COM, when they visit the Site or when they place an Order.

### **PROCESSING OF YOUR PERSONAL DATA**

#### **ARTICLE 1.      CONDITIONS FOR THE PROCESSING OF PERSONAL DATA**

CAMPINGS.COM is required to collect and process the Personal Data of Site Users and of its Customers when they make a reservation for one of its Offers.

CAMPINGS.COM is responsible for processing Users' Personal Data and has appointed a data protection officer. CAMPINGS.COM therefore complies with the provisions of law n ° 78-17 of January 6, 1978 relating to data processing, files and freedoms known as "*Computing and Freedoms*" of the General Data Protection Regulation known as "RGPD" (Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to data processing, together the “**Applicable Regulations**”).

CAMPINGS.COM, undertakes in particular to:

- Respect and ensure transparency, loyalty and legality in the processing and use of personal data;
- Limit the processing of personal data to specific, explicit and legitimate purposes;
- Minimize the collection and storage of personal data with regard to the purpose of the processing;
- Guarantee the accuracy of personal data and allow their erasure or rectification;
- Limit the retention of personal data;
- Ensure the security, integrity and confidentiality of personal data.

#### **ARTICLE 2.      PERSONAL DATA COLLECTED BY CAMPINGS.COM**

Certain Personal Data is mandatory in order to be able to book a Stay.

The categories of Personal Data collected by CAMPINGS.COM are as follows:

- Customer or Customer contact data: telephone, postal address, e-mail address;
- Identification data of the Client (s), as well as of the other participants whose data will have been communicated to him / her by the Client (s): marital status, family situation;
- Bank details of the Customer (s): credit card number, holiday voucher or gift card;
- If the Client is a beneficiary and benefits from CAF family vacation assistance: beneficiary number;

- If the Customer is an employee of a social and economic committee partner of CAMPINGS.COM: name of the company and identifier, number or identifier CNAS or CGOS;
- If applicable, telephone conversation with a User who called CAMPINGS.COM, if the User has not objected.

This collection concerns the data of all travelers registered on the booking confirmation.

Users must provide CAMPINGS.COM in an exact, sincere and genuine manner with their Personal Data as well as those of the participants in the Stay.

### **ARTICLE 3. PURPOSE OF THE COLLECTION OF PERSONAL DATA**

The data collected by CAMPINGS.COM are used:

- As part of the processing, execution and monitoring of the Customer's order, Personal Data is collected and processed on the basis of the contract concluded between the Customer and CAMPINGS.COM, for the following reasons:
  - Creation and management, access and use of the Customer's account, if the Customer has created an account;
  - Processing of Customer requests and reservations;
  - Accounting and financial management of reservations (invoicing, payment);
  - Follow-up of the execution and proper execution of the order;
- As part of the management of prospects and Customers, Personal Data is collected and processed on the basis of the User's consent, for the following reasons:
  - commercial solicitation carried out by CAMPINGS.COM for similar products or services by sending newsletters, SMS, mail or via social networks;
  - collection of customer reviews;
- As part of activities related to the operation of the services offered by CAMPINGS.COM, Personal Data are collected and processed on the basis of the legitimate interest of CAMPINGS.COM, for the following objectives:
  - improvement of the services offered by CAMPINGS .COM;
  - detection of fraudulent activities or breaches of the security of the services provided by CAMPINGS.COM and possible prosecution;
  - analysis, statistics and reporting operations;
  - response to a request for legal communication.

### **ARTICLE 4. TRANSFER OF USERS 'PERSONAL DATA**

Personal Data collected by CAMPINGS.COM is communicated to CAMPINGS.COM service providers and Partners under the following conditions:

- data collected in the context of order processing and the execution of Stays reserved are transmitted to CAMPINGS.COM Partners to whom the reservations are transmitted;
- companies to which CAMPINGS.COM has entrusted the provision of services related to the services offered by CAMPINGS.COM such as processing bank cards, sending newsletters, these companies being

contractually bound to comply with the provisions of the Applicable Regulations in the same terms as CAMPINGS.COM.

CAMPINGS.COM may transmit Users' Personal Data to several recipients and in particular:

- to CAMPINGS.COM employees whose intervention is necessary for the performance of services or monitoring of customer relations (marketing and sales department);
- to the Partners for the organization of the Stay. As such, Personal Data may be transferred outside the European Union only in the event that the Partner is itself located outside the European Union;
- to CAF, for the inclusion of family vacation assistance when booking the stay;
- to Pledg, a partner of Campings.com, allowing Users to be offered an advance payment or deferred payment or in installments. In the latter two cases, Pledg and Campings.com are jointly responsible for the processing. The main lines of their agreement are provided in the Annex;
- to subcontractors appointed by CAMPINGS.COM, who cannot have the data for purposes other than those mentioned above:
  - Google Cloud Platform, which is the host of the Site and whose servers are located within the Union European;
  - Zendesk, which is the publisher of the assistance and customer support solution used by CAMPINGS.COM. As such, Personal Data may be transferred to countries outside the European Union, in particular the United States. In order to guarantee the protection of Personal Data, CAMPINGS.COM sets up standard contractual clauses of the European Commission;
  - SMILE, which manages customer support on behalf of CAMPINGS.COM. As such, Personal Data may be transferred to Tunisia. In order to guarantee the protection of Personal Data, CAMPINGS.COM sets up standard contractual clauses of the European Commission;
  - EMARSYS, which is the email delivery service for CAMPINGS.COM, located within the European Union;
  - Trust Pilot, which collects the opinions of Customers, located within the European Union;
  - Spot-Hit, which is the SMS sending service provider, and whose servers are located within the European Union;
  - CAMPINGS.COM payment providers, such as Paypal, if the Customer has an account with this company or Ayden, Verifone, whose servers are located within the European Union

Each of the stakeholders, responsible for processing the data on behalf of CAMPINGS.COM, presents sufficient guarantees to meet legislative and regulatory requirements.

CAMPINGS.COM undertakes not to communicate, assign or transfer Personal Data to third parties without the consent of the Users, except in the event that they should be communicated to the judicial and administrative authorities on legal requisitions.

#### **ARTICLE 5. USERS' RIGHTS OVER THEIR PERSONAL DATA In**

accordance with the Applicable Regulations, the Users, as well as the other participants of the Stay, may exercise the following rights over the Personal Data concerning them, under the conditions and limits provided for by the Applicable Regulations

- right of access, rectification and erasure of data;
- right to limit processing and to oppose processing, including in the event of commercial prospecting;

- right to data portability;
- right to withdraw consent at any time, when it was given to CAMPINGS.COM, it being specified that any prior processing of Personal Data will remain lawful;
- the customer's right to communicate his directives relating to the storage, erasure and communication of his Personal Data after his death;
- lodge a complaint with the National Commission for Computing and Liberties.

For any question relating to the protection of Personal Data or to exercise their rights, Users can write to the following postal address: CAMPINGS.COM - 18-20 rue du Faubourg du Temple 75541 PARIS CEDEX 11 France, or to the 'email address: [dpo@campings.com](mailto:dpo@campings.com) , data protection officer.

In accordance with the Applicable Regulations, CAMPINGS.COM will have one month to respond to any request, subject to a possible extension, and reserves the right to oppose any request considered abusive due to its repetitive nature.

Users are informed that they can also modify their data by logging into their customer account.

## **ARTICLE 6. PROTECTION, SECURITY AND CONSERVATION OF PERSONAL DATA**

CAMPINGS.COM undertakes to ensure the protection of Users' Personal Data by putting in place appropriate technical and organizational measures in order in particular to prevent them from being distorted or damaged. or that unauthorized third parties have access to it.

CAMPINGS.COM undertakes to ensure that this protection is provided by any person likely to carry out processing for the purposes described below on personal data.

In the event of a security breach accidentally or unlawfully resulting in the destruction, loss, alteration, unauthorized disclosure of transmitted personal data or unauthorized access to such data, CAMPINGS.COM will notify the data breach to all data controllers at the Commission Nationale de l'Informatique et des Libertés within 72 hours as well as to the person concerned by the processing, if there is a high risk for their personal data.

Unless legal provisions impose a specific retention period, CAMPINGS.COM keeps Users' Personal Data:

- up to 5 years after an Order;
- up to 3 years from the last contact since using the contact form;
- up to 3 years from the posting of the notice or until the notice is withdrawn from the Site;
- for the customer account, up to 2 years from its inactivity.

The data necessary for compliance with a legal obligation (proof, payment, etc.) are kept in accordance with the provisions in force (in particular those provided for by the Commercial Code, the Civil Code and the Consumer Code).

## **COOKIES POLICY**

### **ARTICLE 1. WHAT IS A COOKIE?**

A cookie is a file that can be saved on the hard drive of the User's terminal when he consults the Site. These small files may contain, for example, the browser language, the User's shopping cart and their preferences.

CAMPINGS.COM places cookies on the User's terminals in order to allow them to navigate in optimal conditions on the Site, to save their profile and to restore their preferences when they connect via their usual terminal, or to realize statistics.

### **ARTICLE 2. COOKIES USED BY CAMPINGS.COM**

CAMPINGS.COM uses cookies:

- navigation, which are necessary for the proper technical functioning of the Site because they make it possible to optimize the display of content from each terminal;
- functional, which are not essential for the proper functioning of the Site but optimize the experience on the Site by making it possible to identify Users, save their language and find their shopping cart;
- analytics and audience measurements, which allow users to follow their browsing for optimization purposes;
- advertising, which collect data on the performance and exposure of advertising campaigns and deliver advertising to Users.

The list of cookies is as follows:

Google Analytics <a href="#">Privacy policy</a>	Ga, Gid, 1P_JAR, CONSENT, NID	Allows to distinguish unique visitors to the site by assigning a unique identifier for each visitor. Cookies Group used to create statistics and know the conversion
Google Ads Privacy Policy		
Google Conversion Linker Privacy Policy		
Google Remarketing Privacy Policy		
Bing Privacy Policy		
Plausible Privacy Policy		
Wisepop Privacy Policy		
Advertise Me Privacy Policy		Authority to broadcast commercials
Criteo Privacy Policy		
Content Square Privacy Policy		
emarsys Privacy Policy		allows us to send you emails personalized

Facebook Pixel <a href="#">Privacy Policy</a>	Fbp	Used to provide more relevant ads on Facebook
Facebook Conversion Tracking <a href="#">Privacy Policy</a>		
Net Affiliate Privacy Policy		
Official Conversion Tracking Holidays Conversion Privacy policy		statistics and tracking Official Holidays
Remailme Privacy policy		Personalize commercials
Squadata Privacy Policy		Customize commercials
Tripadvisor Privacy Policy		
Trustpilot <a href="#">Privacy Policy</a>		Lets gather customer reviews
Yahoo! Privacy Policy		
Zendesk Privacy Policy		
Leboncoin Privacy Policy		
Orissa Digital Privacy Policy		Authority to broadcast commercials
R Advertising Policy of confidentiality		to distribute advertising messages
Management Trustedshops Confidentiality policy		Allows us to collect customer opinions
Toocamp Confidentiality policy		Statistics and monitoring of conversions Toocamp
Wonderpush Confidentiality policy		Allows you to send you personalized notifications and messages

Users can accept or refuse the deposit cookies on their terminal using the banner provided for this purpose when browsing the Site.

CAMPINGS.COM does not keep cookies making it possible to trace Users or obtain IP addresses beyond twelve (12) months after the first deposit in the Users' terminal. In any case, CAMPINGS.COM will again seek the consent of Users after a period of six (6) months.

Users can delete cookies at any time from their browser software and configure it to oppose their registration on their terminal.

CAMPINGS.COM invites Users to refer to the help file of the navigation software to establish the appropriate configuration. Browsing the Site without accepting cookies may be degraded.

### **ARTICLE 3. TRAFFIC DATA**

Traffic data is generated when the terminal is connected to the Internet and to the Site.

These data can be used for statistical purposes in order to analyze the number of visitors to the Site and to improve it by adapting it to their needs. Traffic data is never used by name by CAMPINGS.COM.

## **APPENDIX - MAIN LINES OF THE AGREEMENT CONCLUDED BETWEEN CAMPINGS.COM AND PLEDG**

Campings.com offers Users deferred payment or in installments.

To do this, Campings.com has entered into a partnership with the company Pledg, which has developed a solution allowing payments to be offered in installments or on a deferred basis.

In this context, Campings.com and Pledg carry out joint processing of Users' Personal Data. To this end, and in accordance with the Applicable Regulations, Campings.com and Pledg have entered into a joint liability agreement, the users of which will find an outline below.

Pledg and Campings.com collect the following Users' Personal Data: information relating to the identity of the User, the price of their stay, their bank details as well as the date and payment dates.

Personal Data is processed by Campings.com and Pledg in order to:

- manage the collection and collection of the price of the Order and their relations with Users (legal basis: execution of the contract); and
- comply with their legal and regulatory obligations (legal basis: legal obligations resulting in particular from the Commercial Code and the Monetary and Financial Code);
- Pledg can carry out filtering and scoring of Users to assess the credit risk of a User (legal basis: execution of the contract between the User and Pledg).

Campings.com and Pledg undertake to implement technical and organizational security measures to ensure the confidentiality of Personal Data and prevent them from being distorted, damaged or destroyed, or that an unauthorized third party access it.

Users have the following rights: the right to access, modify and request the deletion of Personal Data, the right to obtain communication in a structured and readable format (unless legally prevented). Users can also request the limitation of the processing of their Personal Data, or oppose processing, including in the event of profiling.

Users can lodge a complaint with the CNIL and define directives relating to their digital will.

As part of the joint processing implemented by Pledg and Campings.com, Campings.com is the point of contact for Users to obtain information about this processing and / or for Users to exercise their rights.

To this end, Users can write to Campings.com at the following postal address: CAMPINGS.COM - 18-20 rue du Faubourg du Temple 75541 PARIS CEDEX 11 France, or at the email address: [dpo@campings.com](mailto:dpo@campings.com).