

## CAMPER PRIVACY POLICY

At CAMPER, we believe, defend and promote the privacy of our customers, suppliers and friends so we are committed to transparency in our policies and actions regarding personal data. Therefore, we invite you to read our privacy policy and to suggest any improvements you deem appropriate for the best defence of your rights.

### Identity of the controller

RURALMED, S.L.U. (hereinafter Camper Group or simply CAMPER) Domicile: C/ Cuartel 91, 07300 Inca, Mallorca, Balearic Islands, Spain CIF: B57060725 Commercial Registry of Palma de Mallorca: Sheet PM 37464 Volume 1805 Folio 48 Website: <u>www.camper.com</u> You can direct your queries about Personal Data Protection to the following email: <u>customercare@camper.com</u> If you do not receive a satisfactory response, you can always contact our Data Protection Officer at the following email address: <u>dpo@camper.com</u>

Depending on the country where you reside, the joint controller of your data may be a subsidiary of the Camper Group, but in any case, always in co-responsibility with RURALMED, all this to better organize the policies of compliance with the General Data Protection Regulation and other applicable regulations. Each co-responsible company will be perfectly identified and you can address any of them.

#### Germany

VALLDEMOSSA GMBH Kasernenstraße 43-45, 40213- DÜSSELDORF- Deutschland HRB 40643

#### Australia

NISKALA PTY LTD Lot 83 SP 71569 known as Suite 209, 410 Elizabeth Street, Surry Hills NSW 2010 Sidney ABN 39098517

Austria BUNYOLA GMBH Donau-City-Straße 7, 1220 Wien, Österreich FN 354447 x

#### Belgium

POLLENSA Société Privée à Responsabilité Limitée Rue des Fripiers 37, 1000 Bruxelles, Belgique Company number: 0811 889 604

Canada

ESTELLENCS IMPORT INC. 2900-550 Burrard St. VANCOUVER BC V6C 0A3 CANADA BN: 850862913

France SOCIETE CELLINI S.A.S.U. 138 Boulevard Haussmann 75008 - Paris RCS PARIS B 602 040 412 KRS: 0000422839 Greece MANCOR SOCIETE A.E. 50, Vassilissis Sofias Street, Athens, Greece Registration Number: 5465501000

#### The Netherlands

LLUBI BV Leidsestraat 59, 1017NV Amsterdam, The Netherlands KvK-nummer 34243818

Ireland ARIANY LIMITED 38 Upper Mount Street, Dublin 2, Ireland Company Number: 415958

#### Italy

ALARO S.R.L. a Socio Unico 23 Via Arena, 20123 – Milan - Italia IT10703120153

Mexico

COSTITX S.A. de C.V. PERIFÉRICO SUR 4690 EDIFICIO PERISUR L307-G DELEGACIÓN COYOACAN C.P. 04500, MÉXICO D.F, MÉXICO. R.F.C: COS 030113782 Registro público de Comercio: 302506

Portugal BINIALI SOCIEDADE UNIPESSOAL, LDA Avenida Infante D. Henrique, n.º 26, 1149-096, Lisboa freguesia de Santa Maria Maior concelho de Lisboa, Pessoa Colectiva n.º 508618363



Switzerland ESPORLES GmbH Niederdorfstrasse 28, 8001, Zurich, Switzerland Firmennummer: CHE-394.680.515

United Kingdom – North Ireland FLORAL LTD. One Bartholomew Close, Barts Square, EC1A 7BL, London UK Company number: 03049846

Mexico COSTITX S.A de C.V. Periférico Sur 4690 Edificio Perisur L307-G Delegación Coyoacán C.P. 04500, México D.F, México R.F.C: COS 030113782 Registro público de Comercio: 302506 Turkey SANTANYİ AYAKKABI TİCARET LİMİTED ŞİRKETİ Asmalı Mescit Mahallesi Sofyalı Sokak No: 22 Kat: Beyoğlu/İstanbul Company number: 716797

USA CAMPER ATLANTIC CORP.

221 Bowery, 10002 NY. USA IRS: 134098119

Spain Biniaraix Manufacturing SLU C/ Cuartel 91, 07300, Inca, Mallorca, España B-57687295

## Purpose of processing

At CAMPER we collect personal data for different purposes. First, to manage your purchases both on the web and in stores and make your shopping experience as pleasant and correct as possible, adapting our website and commercial shipments to your real interests. But we also use them to attend to your queries, for your registration as a user in My Account, for your registration as a member of The Walking Society Community, to remind you of the products that are in your cart or to access your purchase history, to help you choose your product: model, size, colour; to manage your changes or returns or to keep you updated on news, discounts, promotions, draws or events. We invite you to read this Privacy Policy where you will find each of the purposes detailed.

#### Legitimation

At CAMPER we can use your data for different reasons: the main one is to execute the purchase contract that is formalized when making a purchase. In other cases, due to some legal obligation (issuance of invoices, taxes, whistleblower Channel etc.). And in others, either because of the legitimate interest in you having a pleasant shopping experience or so that we can address your doubts or queries, or because among other purposes, we keep you up to date with news, discounts, events or prize draws through our newsletter or any other means of communication, either because you have given us your express consent, or because of the legitimate interest of CAMPER.

### Do we share your data?

At CAMPER we only share your personal data with those companies that provide complementary services to manage the business relationship with you, for example, to process your purchases: transport companies, payment platforms, digital communications services companies, local distributors or with other companies in the Camper Group to manage your doubts or address your queries. We do not sell or trade your personal data and do not transfer it without your full knowledge and acceptance. Only your data may be transferred to partners who host websites and to third parties who assist us in the design and use of the website, the performance of the services or the analysis of the data collected who are required to maintain the confidentiality of the information and have sufficient technical measures to guarantee it. Please note that any of these providers may be outside the EEA (European Economic Area) in which case, we inform you that if we transfer your data we do so with all guarantees and security. To this end, we ensure that the level of legal protection of the countries of destination is adequate and accepted by the European authorities. Likewise, when the situation requires it, the Standard Contractual Clauses approved by the European Commission apply.

Apart from these cases, we will only disclose your data when required to do so by law or judicial or administrative authorities.

## Confidentiality and duty of secrecy regarding the processing of your data

The same confidentiality required of third-party companies, is what we demand in the CAMPER Group of the people who intervene in the processing of your personal data. Any CAMPER worker will observe at all times the secrecy regarding the



personal data that they know about in the development of our activity. The Duty of Secrecy constitutes an obligation for the CAMPER Group, the members of the management and management bodies, persons hired under Labour Law, and professionals who provide services contracted under Commercial Law. It also imposes an obligation on suppliers of goods and services and their employees, processors and their employees and on whom the processor subcontracts and their employees. The obligation of secrecy survives after the termination of the labour or commercial relationship established with the CAMPER Group, as well as after the expiration of the labour, commercial, etc., contracts that link the employees and/or professionals with the Data Processor and the suppliers that supply goods or provide services to the CAMPER Group.

#### Data security

The CAMPER Group has implemented in its workplaces and commercial premises, systems, communication infrastructures, etc., with the security measures that the personal data protection regulations require. It has also adopted logical, physical, organisational, contractual, etc., measures to prevent unauthorised access, destruction, modification, reproduction, disclosure, transmission or re-use of the data by third parties.

In spite of this, whenever you provide personal information on the network, there is a risk that third parties, whose control is beyond our reach, may intercept this information and use it. While CAMPER strives to protect your personal information and privacy, we cannot guarantee the total security of information you disclose over the network under your responsibility.

In the same way, we ask you to be responsible for the accuracy of the data provided for the proper functioning of our relationship. If you provide us with any personal information that wasn't yours (for example, a shipping address different from yours because you're not going to be at home to receive an order; or the details of the person you want to give a gift to using our E-Gift Card, you must inform them and be responsible for them).

#### Data on minors

The services provided by the CAMPER Group are intended for adults in accordance with Spanish law. The CAMPER Group assumes that the natural persons who provide the data using the different channels we have (email, web forms, etc.), are adults.

From CAMPER we address to parents and legal guardians so that they are aware that it is possible for their children to visit our website, so we ask them to indicate that in the event that any website asks them for any information and/or data of any kind, before asking for their authorization.

Because we are concerned about the safety of minors, when they try to submit their record, such record will be rejected and we will inform you that we do not accept minor records. We therefore advise parents and guardians of children to regularly check and control the use that children make of email and other online activities.

#### We respect your rights

The current regulations on the Protection of Personal Data offer you a range of rights that you can exercise whenever you deem it appropriate. You have the rights to access your personal data; to rectify them if they are outdated or incorrect; to object to certain processing; to limit or delete them if you no longer want us to process them; or to carry them if technically possible. Finally, you have the possibility to revoke your consent. You should be aware that there will be legal obligations that temporarily prevent us from complying with your requests of which we would inform you if the case should arise.

To exercise your rights, you can write to:

C/ Cuartel 91, 07300 Inca, Mallorca, Balearic Islands, Spain.

Or by email: <a href="mailto:customercare@camper.com">customercare@camper.com</a>

If you are not satisfied with your request at the above addresses, you can also contact our Data Protection Officer: <a href="mailto:dpo@camper.com">dpo@camper.com</a>



Likewise, you can always go to the Administrative Regulatory Body for Data Protection in your country by clicking on the following link: <u>https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\_en.htm</u>

At CAMPER you have at your disposal different channels of communication with us: physical (in our stores) and digital (on our website or any other means of customer service), through which and, by providing your data, we can interact to offer you the best possible service.

Below, we detail the means by which you can send us your data, the purposes for which we will process them, the legitimacy of the processing and any other information that is relevant to you.

#### Registration form and data for sending purchases through the e-shop

In the event that you have registered with CAMPER as a user to place an order, we inform you that CAMPER will use your data in order to identify you as such, keep you registered on our website and offer you the information on the tracking of your order, as well as to send you the receipt of the same and the corresponding invoice. In the same way, we may use your data for quality surveys or to offer you the necessary information with the services or products on which you have consulted us. We inform you that the legal basis for the lawfulness in the processing of data for these purposes is your consent and the execution of the contract of sale or the pre-contractual relationship, as well as legitimate interest in the event that you have made a purchase. You can cancel your account as a user by sending an email to <u>customercare@camper.com</u>.

CAMPER will retain your data for the duration of the business or contractual relationship and may maintain them once said relationship has ended due to legal obligations with the corresponding administrative or judicial bodies.

The personal information you provide to us may be disclosed to credit reference or fraud prevention agencies, which may keep a record of this information or if there are indications of fraud against you or us, this processing may have consequences such as blocking the operation or even the cancellation of your account as a user. In the same way and for the execution of the contract we may have to transfer them to banking entities, payment platforms or necessary auxiliary companies (logistics or transport, for example) as we have informed you above.

It is possible, however, that we have had access to some personal data of yours without you knowing, as your home address has been used by a third party to send some product or in cases where you have been given a gift through our E-Gift *Card* or gift card. In these cases, you should not worry because we will only use the data for that specific purpose. If your experience after that has been as positive as we expect, you will always be able to register as a user or customer to enjoy in the future the advantages of belonging to the family of CAMPER customers and followers.

#### Marketing and Commercial Shipments

In the event that you have signed up to **The Walking Society Community** or the **Clienteling** programme, you receive our newsletter or any other commercial, promotional or corporate information from any of the companies that are part of CAMPER, and you will also receive preferential treatment to find out about the new seasons, access to exclusive discounts, early access to promotions, access to our magazine, special raffles in collaboration with other companies (from the Group or not) such as stays in our CASA CAMPER hotels, or dinners or other types of discounts in our restaurants and cafeterias, as well as attendance at exclusive events in our shops. We inform you that CAMPER will use the data for the sole purpose of keeping you informed of its activity and so that you can benefit from our promotions, discounts, and be the first to know about new products or services or our new seasons. We inform you that CAMPER may send you information from any of the companies that make up CAMPER, if it is estimated that this information could be useful and as long as it is related to the products or services that we consider are of interest to you.

Normally we will send you this information by email to the email you have provided, but it could also be sent by SMS or any other similar communication system (WhatsApp, telegram, or social networks) offering you, at all times, the possibility of unsubscribing from these emails in an easy and fast way.

It is important that you know that this data processing, based on your browsing experience on our websites when you access a product you have shown interest in, or based on your purchase history, may involve an analysis of your profile as a user that will allow us to know your preferences and tastes to be able to offer you information that is useful and interesting, thereby improving our relationship with you.

We inform you that the legal basis for the lawfulness in the processing of data for this purpose is the express consent given or in the event that you have made purchases in shops or through the website, in the legitimate interest of Camper



to understand that it is beneficial for you to have information about news, promotions, events, raffles and discounts through our Newsletter and offer you a better experience as a user of our website. We inform you that CAMPER will keep your data for the duration of the informative subscription relationship and as long as you do not indicate otherwise.

#### Contact form and Customer Service.

You may have contacted us through the Contact Form on the website or through the customer service in its different modalities: telephone support, virtual chat, appointment service, or the services of "clienteling", TFU (trial follow up) or Notify me. The personal data you provide us with in the existing forms will be used to resolve the query raised in the form itself, to inform you of the arrival of your order, to offer you alternatives to the product of your interest if it is not available, or to attend to you, personally and at the time you have chosen, in your usual or nearest store. In all these cases, CAMPER has the legitimacy to process your data by express consent provided in the form itself or, where appropriate, in pre-contractual measures. The data will not be transferred to third parties, except to other companies of the CAMPER group in the event that their consultation requires such communication. In addition, we inform you that the personal data will remain in the CAMPER files for as long as it is necessary to respond to your request or as long as you do not unsubscribe from services such as "clienteling" and, where appropriate, for a maximum of one year as regards the consultation. We will always offer you the possibility to cancel your data in a simple way.

#### In-store data collection

In the event that you have made a purchase in a physical CAMPER store or in a store with which CAMPER has some kind of agreement, you may be asked for personal data such as your email, mobile phone or others such as your postal address and even if you are a WhatsApp user for certain treatments. In this sense, CAMPER will use your data to send you the electronic ticket, to process the guarantee of the item, as well as so that you can exercise your rights of product exchange or return where appropriate. The legal basis for the lawfulness in the processing of data for these purposes is compliance with the pre-contractual or contractual relationship. For other purposes, such as registering you for **The Walking Society** community, or registering for the **Clienteling** programme, which in both cases may include sending you newsletters or other commercial or marketing communications (see previous treatments) we will ask for your express consent or Camper will send them to you on the basis of its legitimate interest. In the same way, we inform you that you can object to the processing of the data or limit it to what is really of interest to you. You can do so by sending an email to customercare@camper.com.

CAMPER will retain your data for the duration of the pre-contractual or contractual relationship with you, being able to keep that data once the contractual relationship has ended to comply with legal obligations, or to provide them to the corresponding administrative or judicial bodies, in the event that the communication of the data is necessary in compliance with the provisions of the legislation.

# Data relating to clients, legal entities, self-employed persons and suppliers

In the event that you have provided your data as a contact person of a customer or supplier company or as an individual entrepreneur, either as a customer or as a supplier of any company that is part of the CAMPER Group, we inform you that CAMPER will use the data exclusively for the maintenance of the contractual or pre-contractual relationship and will not transfer them to third parties, except to the companies of the CAMPER Group, and only in the event that the service requires such communication and exclusively for that purpose. The data provided will be kept as long as the contractual relationship is maintained or for the years necessary to comply with legal obligations. In addition, we inform you that as a customer or supplier of any of the companies of the CAMPER Group, any company of the group may send you commercial or corporate information through the means you have provided us, including email, based on the legitimate interest regulated by the General Data Protection Regulation. In the same way, we inform you that you can object to the processing of data for the sending of information of interest by sending an email to <u>customercare@camper.com</u>.

#### Data relating to candidates for employment

In the event that you have contacted us for a job opportunity through the form on this website, or by any other type of communication (email), we inform you that, in accordance with the provisions of the data protection legislation, the personal data provided will be processed by CAMPER to manage your candidacy in current or future selection processes, relying on CAMPER in the application of pre-contractual measures provided for in art. 6.1.b) of the GDPR as well as in the express consent given when delivering or sending your CV with other data that are not strictly professional or so that we can transfer them to other companies of the Group where your professional profile could be better suited.



Your data will be kept as long as you do not revoke the consent given or request the cancellation/deletion of your data or the opposition to the processing, in order to be able to notify you in the event that in the future there was a candidacy adjusted to your profile and without prejudice to its conservation as long as the legal obligations that affect CAMPER persist, who may, periodically, request the review and update of the personal data contained in your curriculum vitae. Even if you have not requested the cancellation or deletion of your data, we understand that we must not have them in our possession for more than 24 months, so after this time, if you want to exercise your candidacy for a job, please send us your updated CV again.

Sometimes, CAMPER uses third parties for the selection of personnel, so it is possible that we may have to provide your data to these types of companies.

#### Claims

In the event that you have submitted a claim for any circumstance to any of the companies that make up the CAMPER Group, we inform you that CAMPER will use the data exclusively to resolve your claim. The legitimate basis for the processing is the contractual relationship formalized with us as well as compliance with current legislation on consumers and users. Camper will not assign them to third parties, except to CAMPER Group companies that may be involved and, solely and exclusively, for that purpose. The data provided will be kept for the time necessary to comply with legal obligations, until the subject of the complaint has been prescribed.

### Whistleblower Channel

CAMPER has implemented a Complaints Channel to comply with the so-called Whistleblower Protection Law (Law 2/2023 of 20 February).

The Complaints Channel is not intended for complaints related to defects or errors in the products, their shipments or deliveries, payments or refunds, or the exercise of the guarantee of the same, complaints that will be channelled by the customer service.

The processing of personal data of informants is governed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, Organic Law 3/2018 of 5 December on the Protection of Personal Data and the guarantee of digital rights and Organic Law 7/2021 of 26 May on the protection of personal data processed for the purposes of the prevention, detection, investigation and prosecution of criminal offences and the enforcement of criminal penalties and Title VI of the Law on the protection of the informant.

The personal data corresponding to the informants will be processed by CAMPER for the purpose of managing the knowledge and investigation of the reported irregularities, the basis for the processing being the fulfilment of a legal obligation and the public interest.

The data will be kept for as long as necessary. In any case, they will be deleted after three months, except when legally obliged to do so. The data will not be transferred to third parties, except to the Judicial Authorities, the Public Prosecutor's Office or the competent administrative authorities.

Informants may at any time exercise their rights of access, rectification, limitation of processing, suppression, opposition and portability, with respect to their personal data, by sending an e-mail to <u>dpo@camper.com</u>. They also have the right to lodge a complaint with the Competent Control Authority (www.aepd.es).

## General Terms and Conditions of Contract

In the event that you have made any purchase, you can access our General Terms and Conditions at <u>www.camper.com</u>

#### Recommendation of websites/web pages

The CAMPER Group, when recommending or linking any website/page, considers that it is of interest to the user. The CAMPER Group does not have a supervisory obligation with respect to the websites/pages it links to or recommends. They have been created by legal persons, individuals or entities not of a legal nature outside the CAMPER Group. The latter does not intervene in its management, nor does it finance them, nor does it make decisions on the contents incorporated, nor does it manage or participate in the services that the linked or recommended websites provide. The



CAMPER Group will cancel any link by refraining from recommending the website/page when it has reliable evidence that it and/or the services it provides are unlawful or injure property or rights of third parties eligible for compensation. CAMPER will not address any claim based on the content of a recommended or linked website.

#### Use of cookies

Click here for information on the use of cookies.

Likewise, when you visit our website, we collect the data known as "click trace" data (server address, domain name, etc.). This information combined with what you have provided allows us to better customize your visits.

## Validity and Modification of the Privacy Policy

The Privacy Policy established by the CAMPER Group is in force from the date of its publication on the corresponding website; it has been reviewed and adapted and the user can archive and/or reproduce it. The CAMPER Group is entitled to modify its Privacy Policy, adapt it to new rules, regulations or guidelines, making it known to the user through its website.