

Landal Privacy Policy

1. IMPORTANT INFORMATION

At Landal GreenParks we understand that privacy is important to you. In this Privacy Policy, we explain how we collect, use and disclose your personal data when you use our website or app. We also explain how you can contact us.

As the data controller, we are responsible for the personal data about you that we collect and use in accordance with this policy and the General Data Protection Regulation.

2. WHAT PERSONAL DATA DO WE COLLECT AND HOW?

When you use our website or app or contact our Contact Centre, we may collect the following types of personal data:

- name;
- contact details, such as address, telephone number and email address;
- nationality;
- date of birth;
- financial information, such as payment details and VAT number;
- username and password if you have created an account;
- information collected through cookies - see our cookie policy (see link at the bottom of this page);
- geolocation when using the app;
- communications with us (such as recordings or conversations with guest service representatives for the purposes of quality assurance and training or when using chat tools);
- searches you perform, transactions and other interactions between you and our online services and apps;
- searches and transactions performed via the website and app;
- details you provide us with about other persons, such as travelling companions;
- When you install our app or use our website, we automatically collect the following kinds of information from your device:
 - IP address;
 - type of device;
 - unique identification numbers of your device;
 - type of internet browser (such as Firefox, Safari, Chrome and Internet Explorer);
 - operating system;
 - how your device has interacted with our online services, including the pages visited, the links that were clicked on, the parks that were viewed and the functions that were used, in combination with the corresponding dates and times;

- details of websites that refer you or the exit pages, as well as the general geographical location (such as the country or city).

We only collect special categories of personal data insofar as necessary to comply with your special requirements during a stay (for instance, when you provide us with information about your health, including mobility issues, to ensure that we can comply with your wishes).

Generally speaking, we collect personal data that we receive directly from you. If you have booked through one of our booking partners, we receive your personal data from them. In addition, we may also receive your personal data from other guests within your group.

In addition to the foregoing, if you are the owner of a residence at one of our parks, we also collect the following personal data:

- the address of your holiday home;
- the deed of transfer of your holiday home;
- citizen service number (BSN); and
- financial information about the rental and occupancy of your holiday home.

3. HOW DO WE USE YOUR PERSONAL DATA AND WHY?

We process your personal data for various reasons in line with one or more of the following legal bases:

- If we need to process personal data to execute an agreement that we have entered into with you, or if we take steps to enter into an agreement with you;
- If we have your permission;
- If we are legally obligated to do so; or
- If this is necessary to look after our own legitimate interests or those of third parties and your interests and fundamental rights do not outweigh those interests.

We require an additional justification to process special categories of personal data. We may only process such personal data if we have obtained your express permission to do so, if you have disclosed the personal data yourself, if this takes place in connection with a legal procedure or if this is necessary for reasons of compelling public interest.

We may process your personal data for one or more of the purposes in the table below; the table also explains the legal bases and, where necessary, our legitimate interests.

Purpose for processing	Basis for processing	Legitimate interest (where applicable)
Processing and executing your booking, including payment and automated access to the accommodation	Contract Permission Legitimate interest	Registration and providing a good guest service

With regard to owners of holiday homes: Carrying out rental administration, including payout of returns and rental income	Contract Statutory obligation	
Managing your account with us, including searches, travel history, travel preferences and comparable information about your use of the website and app	Permission Legitimate interest	Registration and providing a good guest service
To invite you to write a review	Legitimate interest	Understanding how our company is perceived and improving our services
Sending service notifications, including booking updates	Contract Legitimate interest	Keeping our guests informed
Providing details or information that you requested	Permission	
Managing requests as part of our guest service, including complaints	Legitimate interest	Improving our service, staff training, registration and resolving problems
Using cookies to personalise our service to you, for instance in the event of recurring visits to our websites	Permission	
Performing marketing activities	Permission Legitimate interest	Finding out which of our services might be of interest to you and informing you about them
For statistical purposes	Legitimate interest	Evaluating the services we offer or the success of our services
In case of an emergency or an unexpected travel incident where we have to share your contact details with third parties to enable them to provide emergency assistance	Legitimate interest	Protecting our company and our guests
Complying with a statutory obligation or request from authorities	Statutory obligation	
Detecting and preventing criminal activities	Statutory obligation Legitimate interest	Protecting our company and our guests Assisting law enforcement and government institutions
Resolving issues relating to security, fraud or technical problems	Statutory obligation Contract Legitimate interest	Protecting our company and our guests Assisting law enforcement and government institutions

Protecting our rights, property and safety as well as those of our users, guests, employees, contractors, third parties or the general public	Statutory obligation Contract Legitimate interest	Protecting our company, our guests, third parties and the general public
Testing, developing and improving our services	Legitimate interest	Improving our company
Determining, exercising and defending our statutory rights	Legitimate interest	Protecting our company

Further explanation of the use of your geolocation when using the app

There are several reasons why we ask for permission to use your geolocation when using the app, namely:

- Digital key
 - We use your geolocation to search the area for digital locks that you can connect to via Bluetooth. This could be a lock for an accommodation or a lock for a facility at the park, such as the entrance gate or the swimming pool. We only ask for geolocation while using the app.
- Interactive map
 - We use your geolocation to specify where you are on the interactive map in the app. We only ask for geolocation while using the app.
- Automatic check-in of camping guests
 - We use your geolocation to automatically check you in when you arrive at your campsite pitch. Your geolocation gets linked to a geofence, which is a circular geographical region around the park that can be used by the operating system to perform certain actions. When the geofence is broken by the phone from which your geolocation is shared with us, you will be automatically checked in and receive a notification. When the geofence has been breached for the first time, it will be deleted and the geolocation will no longer be tracked. This also happens when you log out of the app or when the camping booking expires. Therefore, we do not actively follow you to “all locations”, even though we also ask for geolocation when the app is not being actively used.

4. WITH WHOM DO WE SHARE INFORMATION?

We *may* share your personal data with:

- present and future group companies
- our employees and contractors if necessary for providing our services to you
- operators of holiday parks booked by you and their service providers
- service providers acting as processors that offer services in the fields of IT, system administration, website hosting and support, marketing and property-related services
- providers of payment services
- companies dedicated to guest reviews and providers of marketing services
- the insurer, if you take out insurance with your booking
- professional advisors, including bank employees, lawyers, auditors, accountants and insurers who provide services to us

- government institutions, regulators and other authorities
- external booking or distribution platforms, travel organisations and booking partners
- debt collection agencies, in the event of a debt
- third parties to whom we sell or transfer parts of our business assets or our company or with whom we merge and companies that we acquire or with whom we merge
- third parties with whom we are allowed to share data with your permission

Landal and third parties are obligated to process your personal data in accordance with the General Data Protection Regulation. If third parties process your data under Landal's instruction, we do not allow them to use your data for their own purposes and we guarantee that they have taken appropriate security measures to protect your personal data.

5. HOW DO WE PROTECT YOUR PERSONAL DATA?

We take technical as well as organisational measures to secure the personal data that we process. We do so in accordance with the applicable statutory requirements and guidelines.

An example of a technical measure is that your personal data is transmitted via a secure connection if you use an online form on our website or app. Your data is also encrypted during the transmission. This means that your data is unreadable if it ends up in the wrong hands.

An example of an organisational measure is that your data can only be accessed by Landal employees who have been authorised accordingly. Furthermore, these employees only have access to your personal data insofar as necessary to perform their duties.

6. INTERNATIONAL TRANSFERS

In principle, we retain your personal data within the European Economic Area ('EEA'). However, it is possible that certain data that we collect may be processed at a destination outside the EEA. We only transfer your personal data to countries outside the EEA insofar as we have ascertained that adequate measures have been taken to protect your personal data in a manner consistent with and compliant with data protection legislation. We always verify that at least one of the following security measures has been implemented:

- an adequacy decision regarding the country in question has been made by the European Commission, or
- we make use of the European Commission's approved standard contractual clauses for transfer from the EEA and, if necessary, additional measures

Please contact us if you would like to know more about the transfer of personal data (see our contact details in section 11).

7. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We retain your personal data only for as long as necessary. To work out the applicable retention period, we consider the quantity, nature and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, any legal or statutory requirements and the relevant standards or guidelines of the industry. If your personal data is no longer required, we will remove or delete your personal data in a secure manner or anonymise it, so that the data can no longer be traced back to you.

8. YOUR RIGHTS

Under certain circumstances, you have:

- The **right to access** your personal data. This right enables you to receive a copy of the personal data that we retain about you to check whether we are lawfully processing your personal data.
- The **right to rectification** of the personal data that we retain about you. It is important that you inform us of any changes to your personal data, such as a change of address. In general, you can change your personal data yourself via the website or app. If your personal data nevertheless remains inaccurate or incomplete, you can contact us to have the data corrected or supplemented. Our contact details are listed below.
- The **right to erasure** of your personal data. This right enables you to ask us to delete your personal data if there is no longer a good reason to continue to process it. In the event of misconduct, non-payment or other unlawful acts, we may retain some of your data for internal use.
- The **right to object** to data processing in the event that we process your personal data on the basis of a legitimate interest or for direct marketing.
- The **right to restriction** of processing of your personal data. This right enables you to ask us to restrict the manner in which we process your personal data, for instance if you dispute the accuracy of the personal data that we retain about you.
- The **right to data portability**, which enables you to receive the personal data you have provided us with in a structured, commonly used and machine-readable format or to ask us to transfer such data directly to third parties.
- The **right to withdraw permission** in the event that we process your personal data on the basis of your permission.

Exercising your rights is free of charge, unless your request is unfounded or excessive. In that case, we may ask you to pay a reasonable fee or refuse your request. It may be necessary for us to ask for further information in order to confirm your identity before we can grant your request. This is a security measure to ensure that your personal data is not provided to persons who are not authorised to receive it.

Please contact us if you wish to exercise one of these rights (see our contact details in section 11). We aim to respond within one month. However, if your request is especially complex, we reserve the right to extend this period by two months, and we will notify you of this. You may not be entitled to information if we responded to a previous request and you submit a new request without a reasonable period of time having passed between the requests.

9. OTHER WEBSITES

Our website and app may contain links to other websites. This privacy policy only applies to our website. Therefore, if you make use of links to other websites, we advise you to read the data protection policies of those websites. We do not accept any responsibility or liability for their policies.

10. UPDATES TO OUR PRIVACY POLICY

We regularly update our privacy policy and post the amendments on our website. This policy was last modified in October 2023.

11. WHO CAN I CONTACT REGARDING DATA PROTECTION?

If you wish to exercise your rights or have questions about the protection of your personal data, please contact us by sending an email to gastenservice@landal.com.

You always have the right to file a complaint with the independent supervisory authority about our use of your personal data. However, before doing so, we kindly ask you to contact us and discuss your concerns with us first.