

# Privacy Policy

Welcome to our website. If you continue to browse and use this website you are agreeing to comply with and be bound by the following disclaimer, together with our terms and conditions of use.

## INTRODUCTION

Camplify Co (UK) Limited is committed to protecting your privacy. This privacy policy (together with our [Terms of Use and Acceptable Use Policy](#) , and any other documents referred to in here) sets out our privacy policy and explains how your personal information (meaning any information about you which is personally identifiable like your name, address, telephone number or e-mail address, generally referred to throughout this policy as **"personal information"** ) will be used. Please read this privacy policy carefully to understand our practices regarding your personal information.

Any reference to **"you"** or **"your"** , means you as a user of our website at [www.camplify.co.uk](http://www.camplify.co.uk) ( **"Website"** ). Any reference to **"we"** , **"us"** or **"our"** is to Camplify Co UK Limited and any contractors who provide services to us in relation to our Website. We are the controller and responsible for your personal data.

We have appointed a Data Protection Manager who is responsible for overseeing questions in relation to this Privacy and Cookie Policy. If you have any questions about this Privacy and Cookie Policy, including any requests to exercise your legal rights, please contact the Data Protection Manager using the details set out below.

## CONTACT DETAILS

Our full details are:

Full name of legal entity: **Camplify Co (UK) Ltd**

**Innovation House 39 Mark Road, Hemel Hempstead Industrial Estate,**

**Hemel Hempstead, HP2 7DN**

Name or title of Data Protection Manager: [ Joel Beencke ]

Email address: [ Joel@camplify.co.uk]

Postal address: Camplify Co (UK) Ltd

Innovation House 39 Mark Road, Hemel Hempstead Industrial Estate,

Hemel Hempstead, HP2 7DN

Telephone number: 0330 8081811

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

This privacy policy only applies to the collection of your personal information by us (regardless of where you visit it from) and the use of that personal information by us and those whom we authorise. It does not cover third party websites to which we provide links, nor does it cover advertisers. They may have their own privacy policies and/or terms and conditions of use and when you leave our Website, we encourage you to read the privacy notice of every website you visit.

By accessing and continuing to use our Website, you accept the terms of this privacy policy. Please note that we may update and amend the privacy policy from time to time and any changes will be posted on our Website. If you do not agree with any of our privacy policy then you should not use our Website .

This website is not intended for children and we do not knowingly collect data relating to children.

## WHAT INFORMATION DO WE HOLD ABOUT YOU AND HOW IS IT COLLECTED?

Personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect and process personal information about you from the forms on our Website.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data as well as driving licence sharing data for any purpose. Aggregated Data may be derived from your personal data but is **not** considered personal data in law as this data does not directly or indirectly reveal your identity.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

This includes information provided at the time of registering to use a service (for example, a, email address and password), posting material or requesting information or services

Name

Date of Birth;

Contact Information such as email addresses and telephone numbers;

Demographic information such as postcode, preferences and interests;

IP address (automatically collected);

Operating system (automatically collected);

A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

in each case, in accordance with this privacy policy.

- details of content, comments and reviews that you make on our Website;
- details of any transactions you carry out through our Website;

- information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use a service (for example, a user name, email address and password), posting material or requesting information or services;
- if you contact us, we may keep a record of that correspondence;
- we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them; and
- details of your visits to our Website including, but not limited to, registration details, plus registration details if accessing via another website (for example, if accessing via Facebook we may store your Facebook registration details), traffic data, location data, uploaded content, comments, reviews and actions and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.

In addition, in common with many other online services, we may use "cookies" or other devices to store and sometimes track information about you (see section entitled "Cookies" below).

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **HOW DO WE USE INFORMATION ABOUT YOU?**

We use information about you when the law allows us to and to help us provide you with a more personalised service which is tailored to suit your needs. We will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>	<b>Retention Period</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you	7 years
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	7 Years

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>	<p>7 years</p>
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<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>	<p>7 years</p>
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<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>	<p>7 years</p>
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To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)	7 years
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To make suggestions and recommendations to you about goods or services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)	7 Years
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**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

**Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

## **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the Camplify Co (UK) Limited group of companies for marketing purposes.

## **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by [contacting us](#).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you from us or a third party via email, telephone, post or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

**To unsubscribe from receiving any such communications, you can use the facility contained in any such communication or you can email us at the email address below or write to us by mail to the address below stating that you do not wish to receive further communications from us.**

## **WHERE DO WE STORE YOUR PERSONAL DATA?**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") so the processing of your personal data will involve a transfer of data outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring that we use certain service providers, we use specific contracts to ensure that your personal information is treated in accordance with this Privacy and Cookie Policy.

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## AMENDING YOUR INFORMATION

You may register your details for certain services and open a user account that you can then use to access and log on to use those services. You may change or update your user name and password or other details at any time via your account.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **WILL WE SHARE YOUR INFORMATION WITH THIRD PARTIES?**

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may pass your information to other parties, for the purposes set out above, as follows:

in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

if Camplify Co UK Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;

where relevant, your user name and information you voluntarily provide in your profile that you register with us will be published on areas of our Website where user submissions are displayed and this will be the identity by which you are known on those areas. Where other users wish to contact you, they will be able to identify you by your user name and any other information you may yourself disclose via our Website;

we may pass your personal information to our employees and agents and third parties to administer the services provided to you by us now or in the future;

some general statistical information about our Website user base, sales patterns, traffic volumes and related matters may be passed on to reputable third parties (including third party advertisers who wish to advertise on our website) but these details will not include information personally identifying you; and we may disclose your personal information to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach of the [Terms of Use and Acceptable Use Policy](#) and / or the breach of other terms and conditions otherwise relating to you or otherwise where required by law and we will co-operate with any law enforcement authorities or court order requesting or directing us to disclose the identity of or locate anyone breaching these [Terms of Use and Acceptable Use Policy](#) or otherwise for the prevention or detection of crime or the apprehension or prosecution of offenders.

We do not disclose information about identifiable individuals to any charities and organisations that we work with, but we may provide them with aggregate information about our users. We may also use such aggregate information to help charities reach the kind of audience they want to target using our Website.

We do not pass or sell your personal information to third persons for any other purpose than those set out above. Any marketing referred to in the section entitled "How do we use information about you?" is conducted by us or third parties based on your consent.

Always think carefully before disclosing your personal information or other information to other users of our Website or otherwise posting your personal information on our Website. It is important that you are aware that any of your personal information or other information which you disclose to another user may

then be disclosed on our Website by that user. We have no responsibility or control over the contents of communications made between users of our Website.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **SECURITY/HOW DO WE PROTECT YOUR INFORMATION?**

We endeavor to take all reasonable steps to protect your personal information and we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

If registered with our Website, we will store your password. To protect security, we do not have access to or visibility of any passwords on our system. Should you forget your password, we will send you an email to the email address you have registered with us and provide a link to reset your password with a new one.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **DATA RETENTION**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table above.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## COOKIES

Cookie Name	Description/purpose	Expiry
_camplify_com_au_session	Used on: <a href="http://www.camplify.co.uk">www.camplify.co.uk</a> Identifies a user session, including the session for a logged-in user. Enables all features that require a user account.	on browser close
pnctest	Used on: <a href="http://www.camplify.co.uk">www.camplify.co.uk</a> For maintaining a connection to the user while they are using our help live-chat (Freshchat)	01-08-2019 21:00:00

catAccCookies	Used on: <a href="http://www.camplify.co.uk">www.camplify.co.uk</a> Used to remember a user's choice about accepting cookies.	1 month
remember_spree_user_token	Used on: <a href="http://www.camplify.co.uk">www.camplify.co.uk</a> For maintaining a shopping basket on our online store section.	2 weeks

## **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

### **Request access to your personal data**

(commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

### **Request correction of your personal data**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

### **Request erasure of your personal data**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **Object to processing of your personal data**

This is applicable where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

### **Request restriction of processing your personal data**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Request transfer of your personal data**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

### **Right to withdraw consent**

This is applicable where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent

If you wish to exercise any of the rights set out above, please [contact us](#).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by email.

This privacy policy was last updated on 9 April 2018.

### **CONTACT DETAILS:**

You can email us with any questions, queries or complaints at [support@camplify.co.uk](mailto:support@camplify.co.uk) or you can write to us at Camplify, Innovation House, 39 Mark Road, Hemel Hempstead, Hertfordshire, HP2 7DN