

## Privacy notice in accordance with Article 13 GDPR

### Name and address of the data controller

The responsible body within the meaning of the General Data Protection Regulation (GDPR) and other data protection regulations is:

FreewayCamper GmbH

Thomas-Wimmer-Ring 14  
80538 München  
Deutschland

Telefon: +49 89 889 970 86  
E-Mail: [info@freeway-camper.com](mailto:info@freeway-camper.com)

### Name and address of the data protection officer

The data protection officer of the data controller is:

Jörg Hermann

Freibadstr. 30  
81543 München

Telefon: +49 89 200 033 580  
E-Mail: [info@jmh-datenschutz.de](mailto:info@jmh-datenschutz.de)

## General information on data processing

### Legal basis for processing personal data

In accordance with Article 13 GDPR, we will inform you of the legal basis for our data processing. If the legal basis is not specified in the privacy notice, the following applies: the legal basis for obtaining consent is Article 6(1)(a) in conjunction with Article 7 GDPR. The legal basis for processing in order to provide our services and fulfil contractual measures, as well as answering inquiries, is Article 6(1)(b) GDPR. The legal basis for processing in order to fulfil our legal obligations is Article 6(1)(c) GDPR. If the processing of your data is necessary to safeguard the legitimate interests of our company or a third party and if your interests, fundamental rights and fundamental freedoms as the data subject do not outweigh the first interest, Article 6(1)(f) GDPR serves as the legal basis for the

processing. In the event that vital interests of the data subject or another natural person require the processing of personal data, Article 6(1)(d) GDPR serves as the legal basis.

## Data deletion and storage period

We adhere to the principles of data minimisation in accordance with Article 5(1)(c) GDPR and storage limitation according to Article 5(1)(e) GDPR. We only store your personal data for as long as is necessary to achieve the purposes stated here, or as stipulated by the retention periods provided for by law. After the respective purpose no longer applies or after these retention periods have expired, the corresponding data will be deleted as quickly as possible.

## Note on data transfer to third countries

We also use tools from companies based in third countries on our website. If these tools are active, your personal data may be transmitted to the servers of the respective companies. The level of data protection in third countries does not usually correspond to EU data protection legislation. This means that there is a risk that your data will be passed on to authorities in these countries. We have no influence on these processing activities.

## External links

This website may contain links to third-party websites or to other websites under our responsibility. If you follow a link to any of the websites outside our control, please note that these websites have their own privacy notices. We do not assume any responsibility or liability for these external websites and their privacy notices. Before using these websites, please check whether you agree with their privacy policies.

You can recognise external links either by the fact that they are displayed in a colour which is slightly different from the rest of the text or that they are underlined. Your cursor will show you external links when you move it over such a link. Only when you click on an external link will your personal data be transferred to the destination of the link. The operator of the other website will then receive your IP address, the time at which you clicked on the link, the website you were on when you clicked on the link, and other information that you can find in the respective provider's privacy notice.

Please also note that individual links may result in data transfer outside the European Economic Area. This could give foreign authorities access to your data. You may not be entitled to any legal recourse against such data access. If you do not want your personal data to be transferred to the link destination or potentially even accessed by foreign authorities against your will, please do not click on any links.

## Rights of data subjects

As a data subject within the meaning of the GDPR, you have the option to assert various rights. The data subject rights arising from the GDPR are the right to information (Article 15), the right to rectification (Article 16), the right to deletion (Article 17), the right to restriction of processing (Article 18), the right to object (Article 21), the right to lodge a complaint with a supervisory authority and the right to data portability (Article 20).

**Right of revocation:**

Some data processing can only take place with your express consent. You have the option to revoke your consent at any time. However, the lawfulness of the data processing up to the point of revocation is not affected by this.

**Right of objection:**

If the processing is based on Article 6(1)(e) or (f) GDPR, you as the data subject can object to the processing of your personal data at any time for reasons arising from your particular situation. You are also entitled to this right in the case of profiling based on these provisions within the meaning of Article 4(4) GDPR. Unless we can prove a legitimate interest for the processing which overrides your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims, we will refrain from processing your data after the objection has been made.

If the processing of personal data serves the purpose of direct marketing, you also have the right to object at any time. The same applies to profiling associated with direct marketing. Here, too, we will no longer process personal data as soon as you raise an objection.

**Right to lodge a complaint with a supervisory authority:**

If you believe that the processing of your personal data violates the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the member state of your place of residence, without prejudice to any other administrative or judicial remedy, your place of work or the location of the alleged violation.

**Right to data portability:**

If your data is processed automatically based on consent or fulfilment of a contract, you have the right to receive this data in a structured, common and machine-readable format. You also have the right to request that the data be transferred and made available to another data controller, insofar as this is technically feasible.

**Right of access, rectification and erasure:**

You have the right to obtain information about the processing of your personal data with regard to the purpose, categories and recipients of the data processing, as well as the duration of storage. If you have any questions on this topic or on other topics regarding personal data, you can of course contact us using the contact options provided in the legal notice.

**Right to restriction of processing:**

You may assert your right to the restriction of processing of your personal data at any time. To do this, you must meet one of the following requirements:

- You contest the accuracy of the personal data. While the accuracy of the data is being verified, you have the right to demand that its processing is restricted.
- If processing is unlawful, you can request the restriction of the use of the data as an alternative to deletion.
- If we no longer need your personal data for the purposes of processing, but you need the data to assert, exercise or defend legal claims, you can request the restriction of processing as an alternative to deletion.
- If you object to the processing in accordance with Article 21(1) GDPR, we will weigh up your interests against ours. Until this weighing up is completed, you have the right to request the restriction of processing.

The effect of restricting processing is that, apart from storage, the personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of substantial public interest of the Union or a member state.

## Provision of the website (web host)

Our website is hosted by:

### **Amazon Web Services EMEA SARL**

38 Avenue John F. Kennedy  
1855 Luxembourg

Luxembourg

When you access our website, we automatically collect and store information in so-called server log files. Your browser automatically transmits this information to our server or our hosting company's server.

These are:

- IP address of the website visitor's end device
- device used
- host name of the accessing computer
- visitor's operating system
- browser type and version
- name of the retrieved file
- time of server request
- amount of data
- information on whether the retrieval of the data was successful

This data is not merged with other data sources.

Instead of operating this website on our own server, we may also commission an external service provider (hosting company) to operate it on their own server, which we have named above in this case. The personal data collected by this website will be stored on the hosting company's servers. In addition to the data mentioned above, the web host also stores for us, for example, contact requests, contact details, names, website access data, meta and communication data, contract data and other data generated via a website.

The legal basis for processing this data is Article 6(1)(f) GDPR . Our legitimate interest is the technically error-free presentation and optimisation of this website. If the website is called up in order to enter into contract negotiations with us or to conclude a contract, this serves as a further legal basis (Article 6(1)(b) GDPR). In the event that we have commissioned a hosting company, a order processing contract will have been agreed with this service provider.

## Use of Local Storage Items, Session Storage Items and Cookies

Our website uses local storage items, session storage items and/or cookies. Local storage is a mechanism that enables data to be stored within the browser on your end device. This data usually includes user preferences, such as the "day" or "night" mode of a website, and is retained until you

manually delete the data. Session storage is very similar to Local storage, whereas the storage duration only lasts during the current session, so until the current tab is closed. The session storage objects are then deleted from your end device. Cookies are information that a web server (server that provides web content) stores on your end device in order to be able to identify this end device. They are either temporarily deleted for the duration of a session (session cookies) and after your visit to a website or permanently (permanent cookies) on your end device until you delete them yourself or they are automatically deleted by your web browser.

These objects can also be stored on your end device by third-party companies when you visit our site (third-party requests). This allows us, as the operator, and you, as a visitor to this website, to make use of certain third-party services installed on this website. Examples are the processing payment services or displaying videos on a website.

These mechanisms have a variety of uses. They can improve the functionality of a website, control shopping cart functions, increase the security and comfort of website use and carry out analyses regarding visitor flows and behaviour. Depending on their individual functions, they must be classified in terms of data protection legislation. Are they necessary for the operation of the website and intended to provide certain features (shopping cart feature) or serve to optimize the website (e.g. cookies to measure visitor behaviour), then their use is based on Article 6(1)(f) GDPR. As a website operator, we have a legitimate interest in storing local storage items, session storage items and cookies in order to ensure the technically error-free and optimized provision of our services. In all other cases, local storage items, session storage items and cookies are only stored with your express consent (Article 6(1)(a) GDPR).

If local storage items, session storage items and cookies are used by third-party companies or for analysis purposes, we will inform you about this separately in this privacy notice. When required, your consent will be requested and can be revoked at any time.

## Use of external services

We use external services on our website. External services are services provided by third parties that are used on our website. This can be done for a variety of reasons, such as embedding videos or website security. When using these services, personal data is also passed on to the respective providers of these external services. If we have no legitimate interest in using these services, we will obtain your revocable consent as a visitor to our website before using them (Article 6(1)(a) GDPR).

## Affiliate network

As part of one or more affiliate partner programmes, this website contains adverts and links to our advertising partners' websites, through which we can earn money via reimbursement of advertising costs, for example if you make a purchase from this advertising partner. Our advertising partners use cookies or comparable recognition technologies (e.g. device fingerprinting) to trace the origin of orders. This enables our advertising partners to recognise that you have clicked on the corresponding link on our website.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## AWIN

Our website uses the service AWIN. The provider of this service is AWIN AG, Eichhornstraße 3, 10785 Berlin, Germany.

Further information can be found in the provider's privacy policy at the following URL: <https://www.awin.com/at/datenschutzerklarung>.

## Analytics

We process website visitors' personal data in order to analyse user behaviour. Evaluation of this data enables us to compile information on how visitors use individual components of our website. This allows us to increase the user-friendliness of our website. The analysis tools may be used, for example, to create user profiles for the display of targeted or interest-based advertising messages, to recognise our website visitors the next time they visit our website, to measure their click/scroll behaviour and downloads, to create heat maps, to recognise page views, to measure the length of visits to the website or bounce rates, as well as to trace the origin of website visitors (city, country, the website visitors have come from). The analysis tools help us to improve our market research and marketing activities.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Google Analytics

Our website uses the service Google Analytics. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Hotjar

Our website uses the service Hotjar. The provider of this service is Hotjar Ltd., Dragonara Business Centre 5th Floor, Dragonara Road Paceville St. Julian's STJ 3141, Malta.

Further information can be found in the provider's privacy policy at the following URL: <https://www.hotjar.com/legal/policies/privacy/>.

## LinkedIn Insight Tag

Our website uses the service LinkedIn Insight Tag. The provider of this service is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

The use of this service may result in data transfer to a third country (USA).

Further information can be found in the provider's privacy policy at the following URL: <https://www.linkedin.com/legal/privacy-policy>.

## Microsoft Advertising Web Analytics

Our website uses the service Microsoft Advertising Web Analytics. The provider of this service is Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://privacy.microsoft.com/de-de/privacystatement>.

## Microsoft Clarity

Our website uses the service Microsoft Clarity. The provider of this service is Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://privacy.microsoft.com/de-de/privacystatement>.

## Content delivery network (CDN)

We use a content delivery network (CDN) to optimise the performance and availability of our website. For this purpose, the service provider who makes this network available will process your IP address and information about when you visited our website. All further information on data processing by this service provider can be found in the company's privacy notice.

This processing is based on our legitimate interest (Article 6(1)(f) GDPR).

Our legitimate interest in using a content delivery network is to be able to display our website as quickly, securely and reliably as possible.

## Bootstrap CDN

Our website uses the service Bootstrap CDN. The provider of this service is Prospect One Ltd., Królewska 65A/1, PL-30-081 Krakau, Poland.

The use of this service may result in data transfer to a third country (USA).

Further information can be found in the provider's privacy policy at the following URL: <https://www.jsdelivr.com/terms/privacy-policy-jsdelivr-net>.

## Google Static

Our website uses the service Google Static. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## unpkg

Our website uses the service unpkg. The provider of this service is unpkg, 1999 Harrison Street Suite 1150, Oakland, California, 94612, United States, USA.

The use of this service may result in data transfer to a third country (USA).

## Content management system

A content management system enables the creation, editing, organisation and presentation of digital content. We use a content management system to create content for our website. This enables us to design a more attractive website.

This processing is based on our legitimate interest (Article 6(1)(f) GDPR).

Our legitimate interest is in the technically error-free display and optimisation of the website.

## CraftCMS

Our website uses the service CraftCMS. The provider of this service is Pixel & Tonic, Inc., 320 SW Century Drive Ste 405 #136, Bend, OR 97702 USA, USA.

As this service is hosted locally on the web server, no data is transferred to third parties.

## Hosting

Hosting is the provision of web space and the files on it by a web hosting service.

This involves the transfer and storage of personal data on the web hosting service's servers. In particular, the IP addresses, meta data and communication data of the users as well as data about the website visitor accesses are processed. When a website visitor accesses the page, a connection to the web hosting service's servers is established. This results in the processing of personal data of the website visitor.

This processing is based on our legitimate interest (Article 6(1)(f) GDPR).

Our legitimate interest is to be able to display our website and make it available on the Internet.

## Amazon Web Services

Our website uses the service Amazon Web Services. The provider of this service is Amazon Web Services EMEA S.à r.l., 38 Avenue John F. Kennedy L-1855, Luxembourg.



The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://aws.amazon.com/de/privacy/>.

## Map service

We use a map service on this website. In order for the map to be used and displayed on the website, the map must be loaded from the provider's server. This results in your IP address being transmitted to the provider's server. Depending on the provider, cookies and other technologies, including fonts, are loaded. More information on this can be found in the provider's privacy policy.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Google Maps

Our website uses the service Google Maps. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Marketing

Our website uses tools that offer services related to campaigns, web analytics and personalisation. This enables a central and comprehensive collection of all data, which in turn is necessary for the optimisation and planning of digital campaigns. Our advertising partners may use these services on our website to profile your interests and show you relevant adverts on other websites.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Acceleration Partners

Our website uses the service Acceleration Partners. The provider of this service is Acceleration Partners Ltd, 6 Liberty Square, PMB 96813, Boston, MA 02109, USA.

The use of this service may result in data transfer to a third country (USA).

Further information can be found in the provider's privacy policy at the following URL: <https://www.accelerationpartners.com/privacy-policy/>.

## Interface software

Business processes run faster, more cheaply and with fewer errors if they are automated using software via interfaces. This allows them to be efficiently integrated into the company's processes via its own website or social networks. We use interface software on our website to link different applications and to transfer personal data securely from one application to another.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Google APIs

Our website uses the service Google APIs. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Google Tag Manager

Our website uses the service Google Tag Manager. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Social media

We use social media plugins to connect our website with our social media channels. The integration of the plugins is intended to make it easier for visitors to our website to follow our channels on social networks and to share, like or comment on content. Some social media plugins enable the user behaviour of website visitors to be analysed with regard to their behaviour on social networks. The use of plugins is intended to raise our profile and increase the number of followers on our channels.

The plugins also process personal data and transfer data to these social networks. This transmission occurs as soon as the website is accessed. Processed data includes, for example: Name, address, email address, telephone number, access time, device information, IP address.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Facebook

Our website uses the service Facebook. The provider of this service is Meta Plattform Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Dublin, D02x525,, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://www.facebook.com/privacy/policy>.

## Facebook Connect

Our website uses the service Facebook Connect. The provider of this service is Meta Plattform Ireland Limited (Marketplace), 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://de-de.facebook.com/policy.php>.

## LinkedIn

Our website uses the service LinkedIn. The provider of this service is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

The use of this service may result in data transfer to a third country (USA).

Further information can be found in the provider's privacy policy at the following URL: <https://www.linkedin.com/legal/privacy-policy>.

## Appointment booking

You have the option to make appointments with us directly on our website. If you enter the requested data and the desired date in the mask provided, our system will suggest available dates. We will use the data you enter (name, email address and optionally telephone number) to plan and carry out the appointment and, where applicable, to follow up with you afterwards.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Planyo

Our website uses the service Planyo. The provider of this service is Xtreme GmbH, Via Cantonale, 6633 Lavertezzo, Switzerland.

The use of this service may result in data transfer to a third country (Switzerland). The European Commission has confirmed an adequate level of data protection for the country by adequacy decision.

Further information can be found in the provider's privacy policy at the following URL: <https://www.planyo.ch/privacy.php>.

## Video/Music service

We integrate audio files and videos into our website. These are retrieved from the server of our provider, the so-called audio or video platform. In order to be able to play an audio file or a video, your end device establishes a connection with the audio or video platform and transmits personal data to it. This includes in particular your IP address and any location data or information about your browser and end device.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## YouTube

Our website uses the service YouTube. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Web fonts

This site uses so-called web fonts for the uniform display of fonts, which are provided by an external provider and loaded by the browser when the website is accessed. When web fonts are loaded, the web font provider becomes aware that our website has been accessed from your IP address, as your browser establishes a direct connection to the web font provider.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Google Fonts

Our website uses the service Google Fonts. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Advertising

Our website uses tools that facilitate or enable the placement of advertising, as well as evaluating its success. For this purpose, personal data is processed, in particular the IP address, access times and device information.

Processing only occurs if you expressly give consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent Art. 6(1)(a) GDPR. Without your consent, data processing in the manner described above will not take place. If you revoke your consent (e.g. via the consent banner or other options provided on this website), we will stop this data processing. The lawfulness of the processing carried out until the revocation remains unaffected.

## Google Ads

Our website uses the service Google Ads. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Google AdSense

Our website uses the service Google AdSense. The provider of this service is Google Ireland Limited (GV), Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## Google Double Click

Our website uses the service Google Double Click. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of this service may result in data transfer to a third country (USA). The provider of this service is certified according to the EU-U.S. Data Privacy Framework and therefore provides an adequate level of data protection.

Further information can be found in the provider's privacy policy at the following URL: <https://policies.google.com/privacy>.

## LinkedIn Ads

Our website uses the service LinkedIn Ads. The provider of this service is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

The use of this service may result in data transfer to a third country (USA).

Further information can be found in the provider's privacy policy at the following URL: <https://www.linkedin.com/legal/privacy-policy>.

## Contact by telephone and email

We have provided a telephone number and email address on our website in accordance with legal requirements. Data transmitted in this way is automatically stored by us in order to process the corresponding enquiries or to be able to contact the person making the enquiry. We will not pass this data on to third parties without your consent.

If contact is made by telephone or via our email address for pre-contractual or contractual purposes, the legal basis for the processing of personal data is Article 6(1)(b) GDPR. For all other contact you make, the legal basis for our processing of your personal data is our legitimate interest in accordance with Article 6(1)(f) GDPR.

## DATA PROTECTION INFORMATION FOR CUSTOMERS, CONTRACTUAL PARTNERS AND INTERESTED PARTIES

Information on data protection regarding our processing of customer and prospective customer data in accordance with Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR).

Dear customer, dear interested party, dear contractual partner,

In accordance with the provisions of Articles 13, 14 and 21 of the General Data Protection Regulation (GDPR), we hereby inform you about the processing of your personal data and your rights under data protection law in this regard. Which data is processed in detail and how it is used depends largely on the requested or agreed services. In order to ensure that you are fully informed about the processing of your personal data in the context of the fulfilment of a contract or the implementation of pre-contractual measures, please take note of the following information.

### 1. PURPOSES AND LEGAL BASES OF PROCESSING

#### 1.1 Contractual relationship pursuant to Art. 6 para. 1 lit. b GDPR

We process the personal data voluntarily provided to us (first name and surname, email address, mobile phone number) in accordance with Article 6(1)(b) GDPR for the contractual processing of ticket orders, to carry out the transport and to open a customer account or as part of pre-contractual measures.

We store the mobile phone number provided voluntarily to contact you in the event of special incidents, late returns and unusual activities. The following additional data may be required for the necessary payment processing: To pay for a booked journey by credit card, FreewayCamper requires your full name, email address and credit card details.

In order to carry out administrative activities (IT services, customer service, accounting, etc.) and to efficiently organize the internal administration of our company, the necessary data will be forwarded to FWC - FreewayCamper GmbH. In this respect, we process the necessary data for the following purposes in accordance with Art. 6 para. 1 lit. b GDPR:

The data stored for the processing of the contract and for the execution of the booking will be passed on to the local rental stations/the owners of the campers and other third parties (e.g. service providers for IT, camper delivery and collection, customer service e-mail and newsletter dispatch and payment processing) to the extent only necessary in the context of registration and for the processing of ticket sales. In justified cases (e.g. damage to the camper), we reserve the right to pass on customer data to the respective operator of the rental station/owner of the camper. The data passed on may only be used by our service providers to fulfil their task and not for other purposes. Insofar as there is order processing, the processing is carried out in compliance with the regulations for order processing in accordance with Art. 28 GDPR.

### **1.2 Legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR**

In addition to processing ticket orders, FWC - FreewayCamper GmbH also uses your data for advertising purposes and for market and opinion research in order to inform you about offers and news tailored to your interests by post or by newsletter. For this purpose, we carry out advertising scoring for interest-based advertising on the basis of a legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR. You can object to the use of your data for advertising purposes, market and opinion research and advertising scoring at any time by sending a message to FreewayCamper GmbH, Thomas-Wimmer-Ring 14, 80538 Munich or to [info@freeway-camper.com](mailto:info@freeway-camper.com) with the title "Privacy Policy".

### **1.3 Fulfilment of legal obligations pursuant to Art. 6 para. 1 lit. c GDPR**

If necessary and legally permissible, we process your data beyond the actual contractual purposes for the fulfilment of legal obligations in accordance with Art. 6 para. 1 lit. c GDPR.

## **2. CATEGORIES OF PERSONAL DATA**

We only process data that is related to the establishment of the contract or pre-contractual measures. This may be general data about you or persons in your company (name, address, contact details, etc.) as well as any other data that you provide to us in the context of establishing the contract.

## **3. SOURCES OF THE DATA**

We process personal data that we receive from you in the course of contacting you or establishing a contractual relationship or in the course of pre-contractual measures.

## **4. RECIPIENTS OF THE DATA**

We only pass on your personal data within our company to those areas and persons who need this data to fulfil contractual and legal obligations or to implement our legitimate interest.

As part of payment processing, your data may be passed on to the following payment service providers. The credit card number or other bank details are not stored by FreewayCamper and are forwarded directly to the payment service providers:

Payments are processed by our partner Unzer GmbH, Schöneberger Str. 21 a, 10963 Berlin. For the prevention and detection of fraud, we transmit your IP address to our partner Unzer GmbH. Your IP address will be stored by Unzer GmbH. All data is transmitted in encrypted form.

The Paypal payment method is processed by PayPal (Europe) S.à r.l. & Cie, S.C.A., 5th floor, 22-24 Boulevard Royal, L-2449 Luxembourg. You can find more information about PayPal's data protection in PayPal's privacy policy.

This website uses an online booking service provided by Xtreme GmbH, Via Cantonale, CH-6633 Lavertezzo, Switzerland, which can be reached at [www.planyo.com](http://www.planyo.com), called Planyo, uses so-called "cookies", which are text files that are stored on your computer to make it easier to use the online booking service. The information generated by the cookies about your use of this website (including your IP address) is transferred to one of Planyo's servers within the EU and Switzerland and stored there. Planyo will use this information to make it easier for you to use the online booking service on subsequent visits by saving search queries and parameters already made. Planyo may also transfer this information to third parties if this is required by law or if third parties process this data on behalf of Planyo. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of the data collected about you by Planyo in the manner and for the purposes described above.

Otherwise, data will only be passed on to recipients outside the company if this is permitted or required by law, if the transfer is necessary for the processing and thus fulfilment of the contract or, at your request, for the implementation of pre-contractual measures, if we have your consent or if we are authorised to provide information. Under these conditions, recipients of personal data may be, for example

- External tax consultant
- Public bodies and institutions (e.g. public prosecutor's office, police, supervisory authorities, tax office) if there is a legal or official obligation,
- Other data recipients for whom you have given us your consent to transfer data: Newsletter service Mailchimp of Rocket Science Group LLC.

## 5. TRANSFER TO A THIRD COUNTRY

Personal data will only be transferred to countries outside the EEA (European Economic Area) or to an international organization if this is necessary for the processing and thus fulfilment of the contract or, at your request, for the implementation of pre-contractual measures, if the transfer is required by law or if you have given us your consent. The recipients in these cases may include Rocket Science Group LLC. The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

## 6. DURATION OF DATA STORAGE

Where necessary, we process and store your personal data for the duration of our business relationship or for the fulfilment of contractual purposes. This also includes the initiation and fulfilment of a contract.



In addition, we are subject to various retention and documentation obligations arising from the German Commercial Code (HGB) and the German Fiscal Code (AO), among others. The retention and documentation periods stipulated there are two to ten years.

Finally, the storage period also depends on the statutory limitation periods, which, for example, according to §§ 195 ff. of the German Civil Code (BGB), are generally three years, but in certain cases can be up to thirty years.

## 7. YOUR RIGHTS

Every data subject has the right of access under Art. 15 GDPR, the right to rectification under Art. 16 GDPR, the right to erasure under Art. 17 GDPR, the right to restriction of processing under Art. 18 GDPR, the right to notification under Art. 19 GDPR and the right to data portability under Art. 20 GDPR.

In addition, you have the right to lodge a complaint with a data protection supervisory authority in accordance with Art. 77 GDPR if you believe that your personal data is being processed unlawfully. The right to lodge a complaint is without prejudice to any other administrative or judicial remedy.

If the processing of data is based on your consent, you are entitled to withdraw your consent to the use of your personal data at any time in accordance with Art. 7 GDPR. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected. Please also note that we may have to retain certain data for a certain period of time in order to fulfil legal requirements (see section 8 of this data protection information).

### **Right to object**

**Insofar as your personal data is processed in accordance with Art. 6 para. 1 lit. f GDPR to protect legitimate interests, you have the right to object to the processing of this data at any time in accordance with Art. 21 GDPR for reasons arising from your particular situation. We will then no longer process this personal data unless we can demonstrate compelling legitimate grounds for the processing. These must outweigh your interests, rights and freedoms, or the processing must serve the assertion, exercise or defence of legal claims.**

**In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to processing for the purpose of such advertising. This also applies to profiling insofar as it is associated with this direct advertising. If you object to processing for the purpose of direct marketing, we will no longer process your personal data for these purposes.**

To exercise your rights, you can contact us using the contact details provided above.

## 8. NECESSITY OF THE PROVISION OF PERSONAL DATA

The provision of personal data for the decision on the conclusion of a contract, the fulfilment of a contract or for the implementation of pre-contractual measures is voluntary. However, we can only make a decision within the framework of contractual measures if you provide personal data that is necessary for the conclusion of the contract, the fulfilment of the contract or pre-contractual measures.

## 9. AUTOMATED DECISION-MAKING

In principle, we do not use fully automated decision-making in accordance with Art. 22 GDPR to establish, fulfil or implement the business relationship or for pre-contractual measures. Should we use these procedures in individual cases, we will inform you of this separately or obtain your consent if this is required