

## **Online Privacy Policy**

Thank you for using this website, which is owned by Escape Campervans, Inc. (“Escape Campervans,” “we,” “us,” or “our”).

### **Effective Date**

May 18, 2018

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy [here](#).

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### **Scope of This Policy**

This privacy policy (this “Policy”) will inform you as to how we look after your personal information when you visit our Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. This Policy applies only to information collected through [www.escapecampervans.com](http://www.escapecampervans.com) (this “Site”). [It [also applies] [does not apply] to information collected through other channels, such as over the phone or in person.]

This Policy does not apply to third-party platforms or to other platforms owned by Escape Campervans.

## **Links to Other Sites**

This Site may provide links to other websites operated by third parties, including in some cases our third-party vendors. Escape Campervans does not control these websites and is not responsible for their data practices. These other sites may send their own cookies to your device, may independently collect data or solicit personal data or personally identifiable information, and may or may not have their own published privacy policies. Any information you provide to third parties on their websites is covered under their privacy and data collection policies and is not covered by this Policy. Please review the privacy policy posted on any site you visit before using the site or providing any personal information. The use of such other websites is at your own risk.

## **Your Consent**

Please take a few minutes to review this Policy before using this Site, since it sets out the legal grounds for our collection, use and disclosure of your information, including, where relevant, your consent.

## **This Policy is Part of Our Terms of Use**

This Policy is part of the Terms of Use that govern your use of this Site. A link to our Terms of Use is provided at the bottom of each page of this Site.

## **Types of Information We Collect**

Escape Campervans collects personal information about you, i.e. information that can be used to identify you as an individual.

- (a) *Information You Manually Provide.* Escape Campervans collects the information you manually provide (using your keyboard, mouse, or touchpad) when you use this Site. For example, we collect the information you provide when you sign up for our newsletter, create an account, make a reservation, ask us a question, or otherwise interact with this Site. Some of the information you manually provide may be personal information, such as contact information (e.g. where you live and how to contact you) and/or identity information (e.g. your name, nationality, gender, driving license number (or equivalent), or other information contained in identity-related documentation).
- (b) *Information From Contracts and Transactions with You.* Escape Campervans collects details about payments to and from your accounts and other details of products and services you purchased from us. Details about the products and services provided to you by Escape Campervans are also collected.

- (c) *Information from your browser or device.* Escape Campervans collects information that is sent to us automatically by your web browser or mobile device. This information typically includes your IP address, the name of your operating system, the name and version of your browser, the date and time of your visit, and the pages you visit. The information we receive may depend on your browser or device settings. We may combine the information we receive from your web browser and/or device with other information in an attempt to identify you or we may combine it with information that does identify you.
- (d) *Information Collected by Cookies and Other Technologies.* A “cookie” is a small file placed on your device when you visit a site that can be understood by the site that issued the cookie. We use cookies and other technologies, including device identifiers, to collect information and support certain features of this Site. For example, we may use these technologies to:
- (i) collect information about the ways visitors use this Site—which pages they visit, which links they use, and how long they stay on each page;
  - (ii) support the features and functionality of this Site—for example, to save you the trouble of reentering information already in our database or to prompt the settings you established on previous visits;
  - (iii) personalize your experience when you use this Site; and
  - (iv) improve our marketing efforts, including through use of targeted advertising.

The information we collect using cookies and similar technologies may be personally identifiable and we may combine it with other information in an attempt to identify you or we may combine it with information that does identify you.

### **How You Can Control What Data Is Collected Through Cookies**

The information we collect may depend on your browser settings. Most web browsers automatically accept cookies, but you can usually alter the setting of your browser to prevent that; however, doing so may mean that you are unable to use all of the functionality of this Site.

If you do not wish to receive cookies, please refer to the help section of your Internet browser (Chrome, Safari, Firefox, Internet Explorer, etc.) to learn how to either block all cookies or receive a warning before a cookie is stored on your computer.

### **Information About Third-Party Cookies and Interest-Based Advertising**

In addition to the cookies Escape Campervans delivers to your computer or mobile device through this Site, certain third parties may deliver cookies to you for a variety of reasons. For example, we may use Google Analytics, a web analytics tool that helps us understand how visitors engage with our Sites. To learn more about Google Analytics, [click here](#). Other third parties may deliver cookies to your computer or mobile device for the purpose of tracking your

online behaviors over time and across nonaffiliated websites and/or delivering targeted advertisements either on this Site or on other websites.

You have choices about the collection of information by third parties on our Sites. For example, if you don't want information about your visit to this Site sent to Google Analytics, you may download an Opt-out Browser Add-on by [clicking here](#). Please note that the Add-on does not prevent information from being sent to Escape Campervans.

In addition, if you would like to opt out of having participating entities collect your online behavior for advertising purposes when you are browsing our websites, [click here](#) for a "Website Opt Out." You will be directed to an industry-developed website that allows you to choose whether each listed entity may collect and use data for interest-based advertising purposes. It may be that some of the third parties that collect interest-based information on this Site do not participate in the Website Opt Out, in which case the best way to avoid third-party tracking of your online behaviors may be through your browser settings and deletion of cookies.

The Website Opt Out described above works only on websites. To opt out of having participating entities track your behaviors for advertising purposes when you are using a mobile app, download and use the Digital Advertising Alliance's "App Choices" app. As with the Website Opt Out, the "Mobile App Opt Out" prevents tracking only by participating entities.

Please note that the Website Opt Out and Mobile App Opt Out are device specific and the Website Opt Out is browser specific. If you wish to opt-out from having interest-based information collected by participating entities across all devices and browsers, you need take the steps outlined above from each device and browser.

*Do Not Track Mechanisms.* Your browser may deliver a "Do-Not-Track ('DNT') signal" to this Site. Because of the changing state of technology and indecision within the technology and marketing industries regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals.

*Previously Expressed Preferences.* You may change previously expressed preferences regarding how we use information you provide on or through this Site. For example, if you have provided your contact information and receive periodic commercial emails from us, you may decide to stop receiving those emails by clicking the "unsubscribe" link in an email's footer. You may be able to change other preferences through an account you create on this Site. Otherwise, please contact us using the information provided below.

## **How and Why We Use Information Collected Through This Site**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you ("Performance of a contract");

- Where it is necessary for our legitimate interests (i.e. we have a business or commercial reason for using your information) and your interests and your fundamental rights do not override those interests (“Legitimate interests”);
- Where we need to comply with a legal or regulatory obligation (“Legal obligation”); or
- Where you consent (“Consent”).

<b>What we use your personal information for</b>	<b>Our reasons</b>	<b>Our legitimate interests</b>
To provide and manage our products, services and Site (including any online account with us).	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Providing high quality customer service.</li> </ul>
To process transactions and carry out obligations arising from any contract entered into between you and us.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
To create, process and deliver the accounts you hold with us or the products or services you receive from us.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
To communicate with you and respond to your inquiries, including responding to complaints and attempting to resolve them.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Providing high quality customer service.</li> </ul>
<p>To send you promotional and marketing materials, newsletters or other related communications (including making suggestions and recommendations to you about services that may be of interest to you).</p> <p>To conduct research and analysis to improve the quality of our marketing and the experience of and relationships with our</p>	<ul style="list-style-type: none"> <li>• Your consent</li> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Developing products and services, and what we charge for them.</li> <li>• Defining types of customers for new products or services.</li> <li>• Seeking your consent when we need it to contact you.</li> </ul>

customers.		
To comply with our legal and regulatory obligations (including verifying your identity and driving license for road safety purposes) and to exercise our legal rights.	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
To exercise our rights in agreements and contracts to which we are a party.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> </ul>	
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Developing and improving the network security, efficiency and technical specification of our IT systems and infrastructure.</li> </ul>
To administer auditing, billing and reconciliation activities and other internal and payment-related functions.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
To develop, manage and improve our products, services and the Site (including conducting research and analysis) and to test new products, services, and features of the Site.	<ul style="list-style-type: none"> <li>• Performance of a contract</li> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Providing our customers with high quality products, services and Site features.</li> <li>• Keeping our products, services and Site features updated and relevant.</li> </ul>
To run our business in an efficient and proper way, including in respect of our financial position, business capability, audit, strategic planning and communications.	<ul style="list-style-type: none"> <li>• Legitimate interests</li> <li>• Legal obligation</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with regulations that apply to us.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

### **Change of Purpose**

We will only use your personal information for the uses and purposes set out above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original uses and purposes. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

### **Failure to Provide Personal Information**

Where we need to collect personal information by law or under the terms of a contract we have with you, and you fail to provide that information 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 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.

## **Marketing**

In relation to marketing communications, we may provide you with an “opt in” or “opt-out” mechanism depending on where in the world you are located. An “opt-in” mechanism will provide you the opportunity to positively indicate that you would like or do not object to our sending you such further communications and we will not send you any unless you have “opted-in”. An “opt-out” mechanism will provide you the opportunity to indicate that you do not want us to send you such further communications, and if you “opt-out” we will not send you any.

We will get your express consent before we share your personal information with any external third party for marketing purposes.

## **How to Access, Update or Correct Your Information**

If you have created a profile on this Site, you may be able to access, update or correct your information through your account settings. Otherwise, you may need our help. Please contact us using the information provided below. We will respond to you within a reasonable time and, in any case, within the time limits established by applicable law. We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information you discover. In some cases, however, we may limit or deny your request if the law permits or requires us to do so or if we are unable to verify your identity. If you seek deletion of information that you provided when you were a minor, please contact us using the information provided below.

## **Steps We Take to Safeguard your Information**

We understand the importance of appropriately safeguarding information you provide to us in the course of business operations. We will protect the confidentiality of this information, limit access to this information to those with a business need, and not disclose this information unless required or permitted by law.

We maintain reasonable administrative, physical and technological measures to protect the confidentiality and security of personal information you submit on or through this Site.

Unfortunately, no website, server or database is completely secure or “hacker proof.” We therefore cannot guarantee that your personal information will not be disclosed, misused or lost by accident or by the unauthorized acts of others. Further, we cannot control dissemination of personal information you post on or through this Site using any social networking tools we may provide, and you should have no expectation of privacy in such information.

## **Retention of Information**

It may not always be possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information for as long as your information is necessary for the purposes for which it was collected. For example, we may retain your personal information if it is reasonably necessary to comply with any legal obligations, meet any regulatory requirements, resolve any disputes or litigation, or as otherwise needed to enforce this Policy and prevent fraud and abuse. If requested by a law enforcement authority, we may also retain your personal information for a period of time.

To determine the appropriate retention period for the information we collect from you, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **Additional information for users in the European Economic Area only**

Escape Campervans, Inc is the controller and responsible for this Site.

Our full details are:

Full name of legal entity: Escape Campervans, Inc

Email address: customerservice@escapecampervans.com

Postal address: 4858 Century Blvd. Inglewood, CA. 90304

Telephone number: 310-672-9909

You have the right to make a complaint at any time to the relevant data protection supervisory authority in the EU member state in which you reside. We would, however, appreciate the chance to deal with your concerns before you approach your supervisory authority so please contact us in the first instance.

References to 'personal data' mean any information relating to an identified or identifiable individual.

## **Legal Rights**

Under certain circumstances, you have rights under EU data protection laws in relation to your personal information.

- **Right to withdraw consent at any time:** This applies 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.

- **Request access to your personal data:** This enables you to receive a copy of the personal data we hold about you and to check that it is accurate and that we are processing it lawfully.
- **Object to processing of your personal data:** This enables you to object to processing of your personal data where we are relying on a legitimate interest 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. We will provide you with appropriate choices to opt-in or opt-out as set out above in our Policy.
- **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. 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.
- **Request transfer of your personal data:** This enables you to request the transfer of your personal data to you or to a third party. 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.
- **Request restriction of processing:** 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.
- **Make a complaint:** You have the right to make a complaint at any time to the relevant data protection supervisory authority in the EU member state in which you reside.

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.

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.

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.

### **Where We Store Your Personal Information**

We are based outside the European Economic Area (“EEA”) and so the data that we collect from you will be transferred to, and stored at, a destination outside the EEA. Furthermore, many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Where we transfer personal data to a destination outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

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

### **Other Privacy Rights in Other Jurisdictions**

You may have rights in relation to your personal information under applicable data privacy laws in other jurisdictions. If you wish to exercise any such rights, please contact our customer support at [customerservice@escapecampervans.com](mailto:customerservice@escapecampervans.com).

### **How We Share Information With Others**

Except as described here or in any of our other applicable privacy policies, we will not provide any of your personal information to any third parties without your specific consent. We may share non-personal (anonymized) information, such as aggregate data and usage information with third parties. We may share your personal information to the following categories of recipient:

- (a) *With Third-Party Vendors.* Escape Campervans shares information collected through this Site with third-party vendors who act on our behalf. For example, we may use third-party vendors to design and operate this Site; to conduct surveys; and to help us with our promotional efforts. These third-party vendors may need information about you to perform their obligations. They are required by contract to keep your information confidential and to use it only to provide services on our behalf; however, as described below, we may allow them to use aggregate or de-identified data for their own purposes or to market the products and services of their other clients.
- (b) *With Third-Party Social Media Platforms.* We may provide functionality on this Site that allows you to automatically post information to a third-party social media platform (such as Facebook, Twitter, or Pinterest). If you choose to take advantage of this functionality, people with access to your profile on the third-party platform will be able to see your post. Thus, you should have no expectation of privacy in those actions. Further, if you choose to link your profile on this Site with an account on a third-party social media platform, we may share the information in your profile with that third-party platform. We may also use third-party social media platforms to offer you interest-based ads. To offer such ads, we may convert your email address into a unique value which can be matched by our partner company with a user on their platform. Such platform vendors may gain insights about individuals who respond to the ads we serve.
- (c) *[With Other, Carefully Selected Business Partners.* From time to time, we may share your information with selected third parties for their own marketing purposes. For example, we may partner with third parties to sponsor contests or other promotions, and we may share with these third parties the information you submit to us to participate in the contest or take advantage of the promotion. Before doing so, however, we may offer you the opportunity to “opt out” or “opt in,” as required by applicable law.
- (d) *As Part of a Business Transfer.* Your information may be transferred to successor organization if, for example, we transfer the ownership or operation of this Site to another organization if we merge with or are acquired by another organization, or if we liquidate our assets. If such a transfer occurs, the successor organization’s use of your information will still be subject to this Policy and the privacy preferences you have expressed to us.
- (e) *To Comply With Laws and Protection of Our Rights and the Rights of Others.* We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the

security of this Site; to enforce or apply our online Terms of Use or other agreements; or to protect our own rights or property or the rights, property or safety of our users or others.

- (f) *As Described in a Privacy Notice or Click-Through Agreement.* We reserve the right to disclose your information as described in any privacy notice posted on this Site, or as described in any click-through agreement to which you have agreed.

*Aggregate or De-Identified Information.* We use information collected through this Site to create a compiled, aggregate view of usage patterns. We may share aggregate information with third parties so we and they can better understand our user base. We may also share with third parties information about how particular individuals use this Site, but only on a de-identified basis (“Individualized Data”). Individualized Data reflects the usage patterns of a particular Site user, as opposed to Site users collectively. We may provide basic demographic information (gender and age) in conjunction with providing Individualized Data. Third parties typically use this information for analytical purposes and to market their own products and services.

### **Children Under the Age of Thirteen**

This Site is not intended for children or minors under the age of thirteen years without the permission of a parent or guardian. If you believe that a child has submitted personal information on or through this Site without the consent and supervision of a parent or guardian, please contact us using the information provided below so that we can take appropriate action.

### **This Policy May Change**

We are continually improving and adding to the features and functionality of this Site and the services we offer through this Site. As a result of these changes (or changes in the law), we may need to update or revise this Policy. Accordingly, we reserve the right to update or modify this Policy at any time, providing any notice required under applicable law by posting the revised version of this Policy behind the link marked “Privacy Policy” at the bottom of each page of this Site. To the extent permissible under applicable law, your continued use of this Site after we have posted the revised Policy constitutes your agreement to be bound by the revised Policy. However, we will honor the terms that were in effect when we gathered data from you.

For your convenience, whenever this Policy is changed, we will update the “effective date” at the top of this page. Be sure you check the effective date to see if this Policy has been revised since your last visit.

You may access the current version of this Policy at any time by clicking the link marked “Privacy Policy” at the bottom of each page of this Site.

### **Contact Us**

If you have any questions regarding this Policy, the practice of or your dealings with our Site, or if you would like to exercise any rights you may have in relation to your personal information, please contact us at:

Escape Campervans, Inc.  
4858 W. Century Blvd.  
Inglewood, California 90304

US Phone: 877-270-8267  
International Phone: 310-672-9909

Email: [customerservice@escapecampervans.com](mailto:customerservice@escapecampervans.com)