

SOC-NAT Privacy Policy

This Privacy Policy aims to inform you in a clear, simple, and complete manner about how **Homair Vacances SAS** and all its subsidiaries, including specifically the company **SOC-NAT** (hereinafter collectively referred to as "We", "Us", or "Our"), collect, use, store, share, and protect the personal data you provide to us or that we collect when you use our websites, mobile applications, or during your interactions with us (hereinafter the "Services").

Our primary commitment is to ensure the protection of your Personal Data and to respect the trust you place in us. We process your data in strict compliance with current laws and regulations, including **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data** (the "GDPR"), as well as **Law No. 78-17 of 6 January 1978**, as amended, known as the "**Data Protection Act**".

This Policy is an integral part of our General Terms and Conditions of Sale. By using our Services, you acknowledge that you have read and accepted the terms of this Policy.

1. KEY DEFINITIONS

For a perfect understanding of the terms used in this Policy, the following definitions are provided:

- **Personal Data:** Any information that directly or indirectly identifies a natural person (e.g., name, registration number, telephone number, photograph, date of birth, municipality of residence, fingerprint...).
- **Recipient:** A person authorized to obtain communication of data recorded in a file or processing due to their functions.
- **Data Controller:** The controller of personal data processing is, unless expressly designated by legislative or regulatory provisions relating to this processing, the person, public authority, service, or body that determines its purposes and means. In practice and in general, this is the legal entity embodied by its legal representative.

(Source: CNIL - <https://www.cnil.fr/fr/glossaire>)

2. IDENTITY OF THE DATA CONTROLLER

ECG is a group of companies that includes a number of subsidiaries, of which **Homair Vacances SAS** assumes the role of data controller with regard to your Personal Data for all campsite holiday booking sites in Southern Europe, operated under various trade names.

The brand websites are published and operated by **Homair Vacances SAS**, a simplified joint-stock company with a capital of 329,072,345 euros, registered with the R.C.S. of Aix-en-Provence under No. 484 881 917, SIRET No. 484 881 917 00013, whose head office is located at Immeuble Le Derby, 570 avenue du Club Hippique, CS 20405, 13097 AIX EN PROVENCE CEDEX 02, represented by its General Manager, Mr. Sébastien MANCEAU.

For any questions relating to this Policy or to exercise your rights, we have appointed a Data Protection Officer (DPO) for the entire group. You can contact them at:

- Email address: dpo@homair.com

- Postal address: Délégué à la Protection des Données, Homair Vacances, 570 Avenue du Club Hippique, 13097 Aix-en-Provence cedex 02, France.

3. COLLECTION OF YOUR PERSONAL DATA

We collect your Personal Data on different occasions and by different means.

3.1. Sources of Collection

Direct collection from you: We collect the majority of information directly from you, including information necessary to create an account and use essential services like booking, for which you must provide mandatory information. This data is collected to fulfill our legal obligations and to provide the services you request. But also additional data, as you have the choice to provide complementary information to enrich your profile. You may also provide other information by filling out surveys, participating in forums, or promotions. The purpose of collecting this optional data is to improve and personalize your experience on the site.

Automatic collection during your browsing: When you use certain features of the site, we may collect information about your approximate or precise location (via your IP address or your mobile device's GPS). This is to comply with our legal obligations, to offer you a better user experience, to be able to provide you with all requested services, and to improve functionalities. The majority of mobile devices allow you to control or disable the use of location services in applications from the device's settings menu.

We use **cookies** or other similar technologies, such as web beacons, pixels, and mobile equipment identifiers. We may also allow our business partners to use these tracking technologies on the site or subscribe to the services of third parties to track your behavior on our behalf. The cookies used include:

- cookies necessary for the use of our services
- audience measurement analysis cookies
- cookies to measure your satisfaction
- social network and advertising cookies

We invite you to read paragraph 9 "Cookie Policy" which details the types of cookies used on our site and the solutions to accept/refuse these cookies.

Indirect collection: We may receive information about you from third parties, such as partner travel agencies, works councils, or social network platforms if you interact with our pages. If you link, associate, or connect your Homair Vacances account to a Service provided by a third party (e.g., Google, Facebook), the service provided by the third party may send us information. This information varies and is controlled by the third-party service or depends on the permissions you have given to that service via the relevant privacy settings. To the extent permitted by applicable law, we may receive additional information about you, such as demographic data from third-party service providers and/or partners, and combine it with the information we have about you.

3.2. Details of the Data Collected

We ensure that we only collect data that is strictly necessary for the purposes for which it is processed. The categories of data we collect are as follows:

- **Identification data:** Title, surname, first name, date of birth.
- **Contact details:** Postal address (billing and residence), e-mail address, telephone number (landline and/or mobile).
- **Booking and stay information:**
 - History of your bookings (destination, dates, type of accommodation, amount).
 - Information about stay participants (surname, first name, date of birth of all companions, including minors).
 - License plate number of your vehicle.
 - Preferences and optional services subscribed to (e.g., sheet rental, final cleaning).
 - Information you provide to us for specific requests (e.g., need for a pitch accessible to people with reduced mobility).
- **Economic and financial data:**
 - Payment methods (your full bank card details are processed by our secure payment providers and are not stored by us).
 - Transaction information (date, amount, payment status).
 - Data relating to the management of unpaid invoices.
- **Connection and navigation data:**
 - IP address, connection logs.
 - Type of terminal and browser used.
 - Pages viewed, date and time of consultation.
 - Navigation path.
- **Data relating to the commercial relationship:**
 - History of your communications with our services (customer service, booking service).
 - Your reviews and comments left on our sites or on partner platforms.
 - Your marketing communication preferences.

3.3. Data Relating to Minors

Our booking services are not intended for minors under 18 years of age. We collect data on minor children only when provided by the holder of parental authority as part of a holiday booking. Consent for the processing of data of a minor under 15 years of age must be given by the holder of parental authority.

4. PURPOSES AND LEGAL BASES FOR PROCESSING

Each processing of your Personal Data is based on a specific purpose (an objective) and a legal basis that justifies its lawfulness.

Purpose of Processing	Examples of Use	Legal Basis for Processing
Management of the contractual relationship and bookings	Creation and management of your customer account, processing your booking, managing payments, sending travel documents, managing your stay on the campsite.	Performance of a contract

Provision of customer service	Responding to your requests for information, managing your complaints, monitoring your satisfaction.	Performance of a contract and Legitimate interest
Marketing and commercial prospecting operations	Sending newsletters, promotional offers by e-mail, SMS or post, organizing competitions, carrying out targeted advertising.	Consent (for electronic prospecting) and Legitimate interest (for postal prospecting or for existing customers on similar products)
Improvement of our services and user experience	Carrying out satisfaction surveys, analyzing audience and navigation on our sites, testing new functionalities.	Legitimate interest
Management of accounting and legal obligations	Issuing invoices, conserving accounting documents, managing tourist tax, responding to requests from authorities.	Legal obligation
Prevention of fraud and unpaid invoices	Securing online transactions, analyzing fraud risks, debt collection.	Legitimate interest
Management of disputes	Management of pre-litigation and litigation, constitution of evidence for the defense of our rights.	Legitimate interest

5. RETENTION PERIOD OF YOUR DATA

Your personal data is used by our internal services for administrative and commercial management. The retention period is determined by the purpose of their collection, in compliance with our legal obligations and the recommendations of the CNIL (French Data Protection Authority).

A customer is considered "active" when they perform an action such as a booking or logging into their account. For a prospect, an active contact may be opening a newsletter or a request for information.

5.1 General Retention Periods

For Customers (persons who have made at least one booking):

- In active database (for customer management and marketing): 3 years from your last active contact.
- In intermediate archiving (restricted access):
 - Billing data: 10 years from the close of the financial year, in accordance with Article L. 123-22 of the French Commercial Code.
 - Data for litigation management: Kept for the duration of the applicable legal prescription (generally 5 years).

For Prospects (persons who have never made a booking):

- In active database: 3 years from your last active contact.

Navigation Data (Cookies):

- 13 months maximum from their deposit on your device.

At the end of these periods, the data is either deleted or irreversibly anonymized.

5.2 Summary of Data Retention Periods

This table details the period during which your personal data is kept according to the purpose of its processing.

Purpose of Processing	Retention Period
Purchase and management of bookings	Duration of the contractual relationship.
On-site stay management (access, services, etc.)	Duration of the stay.
Legal and accounting obligations (invoices, etc.)	10 years from the booking.
Data sharing within the Homair Group (customer knowledge)	3 years from the last activity.
Service improvement, loyalty program, complaints management	3 years from the last activity.
Customer knowledge and statistical analysis	3 years from the last activity.
Commercial prospecting operations (newsletters, offers)	3 years from the last activity, or until you withdraw your consent.
Website security and improvement (navigation, fraud prevention)	13 months from collection.
Payment security (fraud risk analysis)	90 days for analysis, then 2 years in archiving for system improvement.
Management of pre-litigation and litigation	Duration of the applicable legal prescription (civil, commercial, etc.).
Protection of vital interests (in case of serious events: disasters, etc.)	For the duration of the event.
Management of legal requests (access, deletion, etc.)	For the duration set by applicable legislation.

6. RECIPIENTS OF YOUR DATA

Your Personal Data is treated with complete confidentiality. It is neither sold nor rented. When you have given your consent, we may share information about you, as described at the time of your consent:

6.1 Group and Personnel

Our employees in the booking, marketing, accounting, IT departments, and the reception staff on the campsites only have access to the data strictly necessary for the exercise of their missions.

The collected data, including your personal data, may be shared within our group of companies, enjoying common ownership or joint control. The sharing of this data is necessary for the performance of the holiday contract that binds us and to list our clientele. We share your data with a limited number of authorized persons and services, in order to offer you the best possible experience in our campsites.

6.2 Subcontractors and Service Providers

We use providers, subcontractors, suppliers, and technical, commercial, and payment partners, who are not part of the Group, and who may process your Personal Data on our behalf and according to our instructions, or as data controllers, to help us provide and carry out the services within the framework of the purposes mentioned above. This includes:

- Our IT hosting providers.
- Our secure payment solution providers.
- Our providers for routing marketing e-mails and SMS.
- Our marketing agencies for managing advertising campaigns.
- Online review companies to collect your satisfaction.

Our service providers are based in Europe. These service providers have limited access to your information in the context of performing these tasks on our behalf and have a contractual obligation to protect it and use it only for the purposes for which it was disclosed and in accordance with this Personal Data Protection Charter.

6.3 Social Network Sites

We may use various social networks such as Facebook, Tiktok, X, YouTube, and Instagram to promote our products and services. Where applicable law permits, we may share some of your limited personal information, such as your e-mail address, with these platforms. This approach aims to generate potential customers, increase traffic to our websites, and offer you relevant marketing offers that might interest you.

It is important to note that the social networks with which we share your personal data operate as independent platforms and are neither controlled nor monitored by our company. For any questions relating to the processing of your data by these platforms, we invite you to consult their privacy policies directly and contact the provider concerned. You retain control of your data and can object to this sharing.

To do this, you can configure the privacy settings directly on your social network accounts. In addition, you can at any time ask us to stop processing your data for direct marketing purposes by contacting us by e-mail at dpo@homair.com.

6.4 Administrative and Judicial Authorities

We may have to communicate your data to the competent authorities (tax administration, police, gendarmerie) to comply with our legal obligations, to respect a legal procedure and respond to claims made against Homair Vacances, to respond to requests in the context of a judicial investigation or in connection with alleged or suspected illegal activity, or any other activity that may expose us, you, or our users to legal liability, for the purpose of executing and applying our General Terms and Conditions of Rental, or to protect the rights, property, or personal safety of Homair Vacances, its employees, its customers, or the public.

6.5 Collection and Payment of Tourist Tax

In jurisdictions where Homair Vacances allows the Collection and Payment of Tourist Tax, as described in the "Taxes" section of the General Terms and Conditions of Rental, customers, within the limits authorized by applicable law, expressly authorize us, without prior notice, to disclose data and other information relating to Customers and their transactions, bookings, and Tourist Taxes to the relevant tax authorities, including but not limited to, the Customer's name, transaction dates and amounts, tax identification number(s), the amount of taxes collected (or due) by Customers from campsites, and contact details.

7. DATA TRANSFERS OUTSIDE THE EUROPEAN UNION

We prioritize the storage and processing of your Personal Data within the European Economic Area (EEA). However, it is possible that, marginally, your data may be transferred to providers located in countries outside the EEA.

In such a case, we ensure that these transfers are governed by appropriate safeguards, in accordance with regulations, in particular by signing the Standard Contractual Clauses of the European Commission or by using providers located in a country recognized as offering an adequate level of protection by the European Commission.

8. SECURITY AND YOUR RIGHTS OVER YOUR DATA

The security of your Personal Data is our priority. We implement appropriate technical and organizational measures to ensure a level of security adapted to the risk and to protect your data against any destruction, loss, alteration, unauthorized disclosure, or unauthorized access.

We require all our subcontractors to present sufficient guarantees regarding security and confidentiality and to process your data only for the purposes we have determined.

In accordance with current regulations, you have several rights concerning your Personal Data.

- **Right of access:** The right to obtain confirmation that your data is indeed being processed by us, and if so, to access this data and obtain a copy of it.
- **Right to rectification:** The right to request the correction of information concerning you that may be inaccurate or incomplete.
- **Right to erasure** ("right to be forgotten"): The right to ask us to delete your Personal Data, subject to our legal retention obligations.
- **Right to limitation of processing:** The right to request the temporary freezing of the use of your data in certain circumstances (for example, if you contest the accuracy of the data).

- **Right to object:** The right to object at any time to the processing of your data for commercial prospecting purposes. You may also object, for legitimate reasons, to other types of processing.
- **Right to portability:** The right to receive the data you have provided to us in a structured, commonly used, and machine-readable format, and to transmit it to another data controller.
- **Right to withdraw your consent:** For processing based on your consent, you have the right to withdraw it at any time, without this affecting the lawfulness of the processing carried out before this withdrawal.

To exercise these rights, you can contact our DPO at the contact details mentioned in paragraph 2 "Identity of the Data Controller". For security reasons, proof of identity may be requested to verify your identity. We undertake to respond to you within one month.

If you believe, after contacting us, that your rights are not being respected, you can file a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

9. POLICY ON COOKIES AND OTHER TRACKERS

We use cookies and other tracking technologies to distinguish you from other users of our sites. This helps us to offer you a quality, personalized, and secure browsing experience, while allowing us to continuously improve our Services.

9.1. What is a cookie?

Cookies are small text files containing data, created when you visit a website, and stored on your computer, tablet, or smartphone. They contain a unique identification number and allow our site to remember your actions and preferences (such as language, font size, and other display settings) for a given period, so you do not have to enter them each time you visit these sites or browse from one page to another. Cookies do not contain any personal information that can identify you directly and cannot be used to run programs or introduce viruses to your device.

- **Session and persistent cookies:** Session cookies are temporary and expire as soon as you close your browser. Persistent cookies remain on your device for a longer period, defined by the cookie itself, allowing a site to recognize you on a subsequent visit.
- **Internal and third-party cookies:** Cookies set directly by our sites are called "internal cookies". We also use services provided by third-party companies (advertising partners, social networks, analysis tools) which may also set their own cookies during your browsing. These are "third-party cookies".
- **Similar technologies:** We use other technologies that work similarly, such as "web beacons" (or "pixel tags") which are small transparent images allowing us to measure the effectiveness of an advertising campaign or an e-mail.

9.2. Our use of cookies by category

We regularly review the cookies we use to limit them to what is strictly necessary, respecting your privacy and ensuring you an optimal experience. Here are the different types of cookies we use:

- **Strictly necessary cookies:** These cookies are essential for the proper functioning of the site and cannot be deactivated. They are generally activated in response to actions you perform, such as setting your privacy preferences, logging into your

customer account, or filling out booking forms. You can configure your browser to block them, but some parts of the site will no longer work. These cookies do not store any personal information.

- **Performance and analysis cookies:** These cookies allow us to count visits and traffic sources in order to measure and improve the performance of our site. They help us identify the most and least popular pages and see how visitors navigate the site. All information collected by these cookies is aggregated and therefore anonymous. If you refuse these cookies, we will not be able to know when you visited our site, which will prevent us from monitoring its performance. We use Google Analytics for tracking and reporting website traffic. This information can be used to better understand our customers and improve the functioning of our site. Homair Vacances uses Google Analytics first-party cookies in conjunction with DoubleClick third-party cookies to provide additional information on demographic data and interests in our Google Analytics reports. To view the privacy policy, [click here](#). To deactivate Google Analytics cookies, [click here](#).
- **Functional cookies:** These cookies allow for improving the functionality and personalization of your experience on our site. They may be set by us or by third-party providers whose services we have integrated into our pages (for example, live chat services or video players). If you do not accept them, some of these functionalities may not work correctly.
- **Targeting/Advertising cookies:** These cookies may be placed on our site by our advertising partners. They may be used by these companies to build a profile of your interests and offer you relevant advertisements on other sites. They do not store personal information directly but are based on the unique identification of your browser and your device. If you do not allow these cookies, you will be exposed to less targeted advertising. For example, we use Google advertising platforms. Cookies set by DoubleClick track browsing habits and activity and allow us to measure ad performance. Please see [this link](#) to learn how to refuse personalized ads. For their privacy policy, [click here](#). To refuse cookies, [click here](#). Learn more about how Google processes your information via [this link](#).
- **Social media cookies:** These cookies are set by a series of social media services that we have integrated into our site to allow you to share our content with your friends and networks ("Share" buttons from Facebook, Twitter, etc.). They are capable of tracking your browser on other sites and building a profile of your interests. This may impact the content and messages you see on other websites you visit. Meta Ads cookies (Facebook, Instagram) may be activated when you visit our site. For their privacy policy, [click here](#). To refuse cookies, [click here](#). We also embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may install cookies on your computer when you click on the YouTube video player, but YouTube will not store personally identifiable information via cookies for playback of embedded videos using privacy-enhanced mode. For their privacy policy, [click here](#). To refuse cookies, [click here](#).

9.3. How to manage your cookie choices?

You have full control over the use of cookies and can manage your preferences at any time.

- **Via our consent management tool:** During your first visit to our site, an information banner allows you to accept, refuse, or customize the deposit of cookies. You can

change your choices at any time by clicking on the "Cookie Management" or "Privacy Preferences" link generally located in the footer of our site.

- **Via your browser settings:** Most browsers allow you to manage your cookie preferences. You can configure your browser to refuse cookies or to alert you when cookies are sent. The configuration of each browser is different:
 - For [Internet Explorer](#)
 - For [Firefox](#)
 - For [Safari](#)
 - For [Google Chrome](#)
 - For [Opera](#)

10. MODIFICATION OF THIS POLICY

We reserve the right to modify this Policy at any time in order to adapt it to legislative, regulatory, or technological developments. In the event of a substantial modification, we will inform you by e-mail or by a visible display on our websites at least thirty (30) days before they come into effect.

For any questions relating to this Policy or to exercise your rights, we have appointed a Data Protection Officer (DPO) for the entire group. You can contact them at:

- Email address: dpo@homair.com
- Postal address: Délégué à la Protection des Données, Homair Vacances, 570 Avenue du Club Hippique, 13097 Aix-en-Provence cedex 02, France.

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