Privacy Policy – Campr

Last updated: 9 November 2026

1. Introduction and data controller

This policy explains how Campr collects, uses and protects personal data when you use campr.no, the app and our services for renting motorhomes and caravans between private individuals and businesses.

The data controller is **Campr AS**, company reg. no. 927 026 910, Rådhusgata 23, 0158 Oslo, Norway. Privacy questions can be sent to **post@campr.no**.

You must be at least 18 years old to create an account with Campr.

This policy applies to all users: **owners** (who rent out vehicles), **renters** (who rent) and visitors to the website. It has been prepared in accordance with the General Data Protection Regulation (GDPR), the Norwegian Personal Data Act and section 3-15 of the Norwegian Electronic Communications Act on cookies.

2. What personal data we collect

Data you provide to us

- **Account and profile:** name, email, phone number, address, date of birth, profile picture and password (encrypted).
- **Identity and background check:** Norwegian users are verified with BankID, which gives us name, date of birth and national identity number. Foreign users are verified with Shufti Pro, which checks an ID document (passport or national ID card) against a photo of your face (selfie). We also register driving licence class and validity, and results of background checks on creditworthiness, driving history and vehicle ownership. The results are never published, but may affect your access to the service.
- **Vehicles (owners):** registration number, photos, description, equipment, weight and payload, pick-up location and insurance information.
- **Bookings:** rental period, prices, add-on services, communication with the other party and reviews.
- **Payment and payout:** reservation of a deposit (NOK 15,000, 10 days before the rental starts), deduction of fees and bank account number for payouts to owners. You pay by card via Stripe or with Vipps. Card data and Vipps login are processed by the payment provider, not by Campr.
- **Damage and extra costs:** damage reports, photos and check-in/check-out reports, mileage, road tolls, ferries, deductibles and correspondence.
- **Content you upload:** photos and texts in listings and profiles.
- **Customer service:** enquiries via email, chat, phone and social media, registered in our help desk in HubSpot.

Data we collect automatically

- IP address, device and browser type, login time and usage patterns on the website.
- Cookies and similar technologies (see section 7).

Data from others

- Identity confirmation from BankID and Shufti Pro, results from external registers for background checks, payment status from Stripe and Vipps, information from Gjensidige in damage cases, and vehicle data from the Norwegian Public Roads Administration (based on registration number).

3. Purposes and legal basis

We only process personal data when we have a legal basis under Article 6 GDPR.

Purpose	Data	Legal basis
Creating and operating user accounts	Account and profile	Contract (Art. 6(1)(b))
Arranging and carrying out rentals	Vehicles, bookings, contact details	Contract (Art. 6(1)(b))
Identity verification (BankID) and background checks on creditworthiness, driving history and ownership	National identity number, driving licence, results from external registers	Legitimate interest in preventing fraud and damage (Art. 6(1)(f)), cf. section 12 of the Personal Data Act on national identity numbers
Payment, deposit, fees and payouts	Payment and account information	Contract (Art. 6(1)(b))
Bookkeeping and accounting	Transactions, invoices	Legal obligation (Art. 6(1)(c)), Norwegian Bookkeeping Act
Insurance, damage settlement, extra costs and disputes	Damage data, check-in/check-out, contracts, correspondence	Contract and legitimate interest in establishing or defending legal claims (Art. 6(1)(b) and (f))
Customer service	Enquiries	Contract and legitimate interest (Art. 6(1)(b) and (f))
Security and abuse prevention	IP, login data	Legitimate interest (Art. 6(1)(f))
Use of listing photos and texts in Campr's marketing	Content you upload	Contract (terms of use) and legitimate interest (Art. 6(1)(b) and (f))
Service improvement and statistics	Usage data (anonymised where possible)	Legitimate interest, or consent for cookies (Art. 6(1)(f) and (a))

Purpose	Data	Legal basis
Newsletters and email marketing	Name, email	Consent (Art. 6(1)(a)) or existing customer relationship (section 15 of the Norwegian Marketing Control Act)
Targeted advertising (e.g. Meta)	Cookies, hashed email	Consent (Art. 6(1)(a))

Facial recognition for foreign users. When Shufti Pro compares a selfie with an ID document, biometric data is processed. This is a special category of personal data (Art. 9 GDPR), and we only do this with your explicit consent (Art. 9(2)(a)). If you do not wish to consent, you can contact us about alternative verification.

We make no automated decisions with legal effect for you without human review. If a booking or account is rejected after the background check, you can ask to be told why and request a manual review.

4. Sharing of personal data

We never sell personal data. We only share it when necessary to deliver the service, or when required by law.

With other users. When a booking is confirmed, the owner and renter can see each other's name, profile picture, phone number and the information needed for handover. Before confirmation, only first name, profile picture and reviews are shown. Reviews you write are visible to other users.

With data processors. Suppliers who process data on our behalf have a data processing agreement with us:

Supplier	Service
Stripe	Card payments, deposits, fee deductions and payouts
Vipps MobilePay	Payment with Vipps
BankID	Identity verification of Norwegian users
Shufti Pro	Identity verification of foreign users (ID document and selfie)
HubSpot	Website hosting, CRM, newsletters and customer service help desk
Meta (Facebook and Instagram)	Advertising, measurement and customer dialogue on social media

With independent controllers. Gjensidige is the insurer for Campr's group insurance and receives information about the rental, the vehicle and the parties in the event of damage or an incident. Stripe, Vipps MobilePay and BankID are independently responsible for their own statutory checks, including under anti-money laundering rules.

Social media. If you visit or interact with Campr's pages on Facebook and Instagram, Campr and Meta are joint controllers for page statistics (Page Insights). Meta also processes data under its own privacy policy.

With authorities. The police, the Norwegian Tax Administration, the Norwegian Public Roads Administration or other authorities when we are obliged to, for example for speeding fines, road tolls, parking charges or investigations.

In a business transfer. In the event of a merger, acquisition or sale of the business, data may be transferred to the new owner, who must then comply with this policy.

5. Transfers outside the EU/EEA

We mainly store data within the EU/EEA. HubSpot stores our data in its EU data centre, but certain sub-processors and support may provide access from the US. Stripe and Meta may also process data in the US. Shufti Pro processes data in the United Kingdom, which the EU has recognised as providing an adequate level of protection. Such transfers only take place on a valid basis: the EU–US Data Privacy Framework where the supplier is certified, or the European Commission's Standard Contractual Clauses (SCCs) with the necessary supplementary measures. You can request a copy of the transfer basis by contacting us.

6. Retention

We keep data for as long as needed for the purpose, and then delete or anonymise it.

Data	Retention period
User account and profile	Until the account is deleted, or 24 months after last activity
Bookings and contracts	3 years after the rental ends (general limitation period)
Accounting and transaction data	5 years after the end of the financial year (Bookkeeping Act)
Damage cases and disputes	Until the case is closed and the time limit for legal claims has expired
Background check	Result (approved/not approved) while the account is active; underlying data deleted within 30 days
Customer service enquiries	24 months after the case is closed

Data	Retention period
Newsletter	Until you unsubscribe
Security logs	Up to 12 months

[Check retention periods against actual practice in the systems.]

7. Cookies and marketing

We use cookies to make the website work and – with your consent – for analytics and marketing.

- **Necessary:** login, booking flow, security and storing your consent choices. No consent required.
- **Analytics:** measures visits and usage, for example HubSpot. Requires consent.
- **Marketing:** the Meta pixel to measure campaigns and show relevant ads on Facebook and Instagram. Requires consent.

Newsletters and email. We send newsletters with tips, offers and news only when you have consented, or about similar services when you are already a customer. Every email has an unsubscribe link. Service messages about bookings, payment and security are always sent, as they are part of the contract.

8. Security

We protect data with encrypted transmission (HTTPS), encrypted passwords, access control based on need, two-factor login for employees and logging of access. In the event of a personal data breach that may pose a risk to you, we notify the Norwegian Data Protection Authority within 72 hours and you without undue delay where required by law.

9. Your rights

You have the right to:

- **access** the data we hold about you, and receive a copy
- **rectification** of incorrect or incomplete data
- **erasure** of data, unless we must keep it by law or for a legal claim
- **restrict** processing in certain cases
- **data portability** – receive data you have given us in a machine-readable format
- **object** to processing based on legitimate interest, and always to direct marketing
- **withdraw consent** at any time, without affecting earlier processing

Send requests to **post@campr.no**. We respond within 30 days and may ask you to confirm your identity. You can also delete your account yourself at any time. If you have active or future bookings, these must be completed or cancelled first. Data we must keep by law, such

as accounting data, is deleted when the retention period expires.

If you believe we process data in breach of the rules, you can complain to the Norwegian Data Protection Authority (Datatilsynet). We appreciate it if you contact us first.

10. Changes and contact

We may update this policy when the service or the rules change. The date at the top shows the latest version, and we will notify you by email or in the app of material changes.

Contact: Campr AS, company reg. no. 927 026 910, Rådhusgata 23, 0158 Oslo, Norway, post@campr.no, +47 404 00 690.