

# INFORMATION REGARDING COOKIES COLLECTED ON THIRD PARTY'S WEBSITES

## 1. Introduction

Please read the following carefully to understand our use of your personal data and how we collect data from our partners' websites which is the source through which we are receiving your data ("**Third Party's Website**"), so that you may better understand the use of Cookies during your navigation and be aware that your privacy is protected and respected at all.

This Cookies Policy provides you with information about the cookies and other similar technologies (hereinafter, collectively referred also to as "**Cookies**") that are set by us as "Data Controller" on the Third Party Website, so that you may better understand the use of Cookies during your navigation and provide your consent thereto.

Please note that this Policy supplements Bravonext SA Cookie Policy available at the following link: <https://www.lastminute.com/terms/cookies-lastminute-group.html>.

## 2. Who is the controller of your data?

Depending on what entity manages the website or domain from which the Cookies are set and processed, the following types of Cookies may exist:

- **First party Cookies:** these are sent to your Device from a website or domain managed by the website owner and from which the service you requested is provided.
- **Third party Cookies:** these are sent to your Device from a website or domain other than the one being visited by you, and are managed by a separate entity that processes data obtained through Cookies.

When we place cookies on a Third Party's Websites those cookies are considered as a "**Third party cookie**", to describe cookies that are set by us as "**Data Controller**" that is distinct from the data controller that operates the website visited by you.

When this policy mentions "Company", "we," "us," "our" or "Data Controller", it refers to:

Bravonext SA, a Swiss company belonging to the lastminute.com group, with registered office at Vicolo de' Calvi 2, 6830 Chiasso (CH) VAT No.:CHE-115.704.228, which is the Data Controller

responsible for processing of Users' personal data under this Cookie Policy (hereinafter, referred to as the "Company", "we", "us", "our" or "Data Controller").

We, being an entity located in Switzerland, are subject to Swiss law regarding the protection of personal data. For that reason, we undertake to comply with the obligations imposed by the Swiss Federal Act on Data Protection of 19 June 1992 (FADP). In the same vein, we inform our Users and/or Customers that the Decision of the Commission of 26 July 2000 in accordance with Directive 95/46/CE of the European Parliament and the Council relating to the adequate level of protection for personal data in Switzerland declared that, in Switzerland, the laws guarantee an adequate level of protection in accordance with Directive 95/46/CE.

### 3. What are cookies and other tracking technologies ?

“**Cookies**” are small text files which are stored by us on your computer, hard drive, smartphone or tablet (hereinafter referred to as, “Device”) when you browse across the web, including the Third Party’s Website. These Cookies hold a modest amount of data specific to you and allows a server to deliver a page tailored to you on your Device.

On the Third Party’s Website we can also use other similar technologies referred to as “tags” (such as, “tracking pixels”, or “script”), “HTML5 local storage”, “web beacons” or “plugins” as well as “software development kits” (SDKs) and fingerprinting techniques, which are in particular technologies that store or access information on the user’s device in order to identify it so that a visits to a website can be analyzed. These similar technologies may also be used together with Cookies to enable information to be stored on, or transmitted to and from, the Device you use to access the Third Party’s Website. Furthermore, by implementing the Cookies and the other similar technologies described above, if you visit the Third party Website and then return to that website or visit any other website where we place our Cookies, these can read and recognize your visits. This allows us to operate our business or improve the way we provide marketing information to the Third Party’s Website or to other websites where we place our Cookies.

### 4. Authorization for the use of cookies

In accordance with the notice of Cookie usage appearing on the Third Party’s Website’s you are able to accept or deny your consent to our Cookies. If you accept them, you consent to the use

of Cookies described herein, except to the extent that you have set your preferences through the Third Party's cookie setting area or you have modified your browser settings to disable their use.

## 5. What categories of your data do we collect and use?

When you visit the Third Party's Website we may collect through Cookies the following categories of personal data:

- Information about your visits to the Third Party's Website and its use, such as the date and time that you visited, the duration of your visit, the website navigation paths of your visit and your interactions with the Third Party's Website as well as the services provided by us that you have requested through it. Please note that where legally possible we may associate this information with those collected by us on our website or in other websites where we place our Cookies.
- Information about the Device and browser you are using, parameters relative to the operating system and the computer environment used by you, your IP address, as well as uniform resource identifiers for requests made, the time of request, the method used to submit the request to the server, the size of the archive obtained as a response, the numerical code indicating the status of the response given by the server (correct, error, etc.).
- Information related to your interactions with our ads and/or those of our partners served on the Third Party's Website, such as those viewed, or clicked on, the type of ad and whether you purchased the product or service advertised.
- Information related to your interests and preferences gathered, with your previous consent, on the Third Party's website, analyzing your surfing behavior in order to aggregate it with other patterns of users who exhibit similar interests. However, our ads are designed to process information in such a manner that the information cannot be directly attributed to a specific, identifiable individual without the use of additional information (such as your name, address, or email address).

Some of this information (including, for example, unique identifiers) may identify a particular computer or device and is considered a "personal data" in some jurisdictions, including the European Union.

## 6. Types of cookies used by us on the Third Party's Website

**Depending on the duration** of the Cookie, through the Third Party's Website we may place:

- **Session Cookies:** these are designed to receive and store data while you access the Third Party's Website and allow the websites to recognise and link the actions of a user during a browsing session. These Cookies do not remain stored on your Device when you exit the browser session on the Third Party's Website.
- **Persistent Cookies:** these types of Cookies can allow the preferences or actions of the user across a site (or across different websites) to be remembered. They remain stored on your Device and can be accessed and processed after you exit the Third Party's Website. They may be used for a variety of purposes including remembering users' preferences and choices when using a site or to target advertising. The Cookie remains on the hard drive until it expires. The maximum duration of our persistent Cookies is 1 year, after this the browser deletes the Cookie from the hard drive.

**According to their purpose**, Cookies served by us can be grouped as follows:

- **Technical cookies:** these cookies are strictly necessary for executing the service provided by us on the Third Party's Website and are essential for performing the task you require. They are not used for other purposes.
- **Measurement cookies:** these cookies are used to collect information about your use of the content of the Third Party's Website, and combination with previously collected information, to measure, understand, and report on your usage of the services provided on the Third Party's Website. This does not include personalisation, i.e. the collection of information about your use of these services to subsequently personalise content and/or advertising for you in other contexts over time.
- **Vendor's Ad selection, delivery, reporting:** this purpose is related to the collection and processing of information through cookies and other tracking technologies placed by us on Third Party's Website, and combination with previously collected information, to select and deliver personalized advertisements for you, and to measure the delivery and effectiveness of such advertisements. This includes using previously collected information about your interests to select ads, processing data about what advertisements were shown, how often they were shown, when and where they were shown, and whether you took any action related to the advertisement, including for example clicking an ad or making a purchase. This might include personalisation, which is the collection and processing of information about your interests to subsequently

personalise advertising and/or content for you in other contexts, such as websites or apps, over time. We, however, use non directly identifiable information (not including, for example, your name, address, email address or telephone number). These Cookies are “third party cookies” managed by us.

## 7. Why do we collect your data?

### **Why?**

A. To create and maintain the contractual relation established for the provision of the Service requested us by you in the Third Party Website in all its phases and by way of any possible integration and modification.

### **On which legal basis?**

To provide a requested service

### **Why?**

B. To meet the legal, regulatory and compliance requirements and to respond to requests by government or law enforcement authorities conducting an investigation

### **On which legal basis?**

To comply with the law

### **Why?**

C. To carry out aggregative statistical analyses so that we can see how the Third Party's Website is used.

### **On which legal basis?**

Where you give your consent (i.e. through the Cookie banner or by your browser's settings)

### **Why?**

D. To tailor and personalise online marketing notifications and advertising for you (i.e. Web Push Notifications) based on the information on your use of the Third Party's Website and your browsing on other sites collected through Cookies.

### **On which legal basis?**

Where you give your consent (i.e. through the Cookie banner or by your browser's settings)

### **Why?**

E. *n.a.*

### **Why?**

F. n.a.

## 8. How long do we retain your data?

We retain your personal data for as long as is required to achieve the purposes and fulfil the activities as set out in this Cookies Policy, otherwise communicated to you or for as long as is permitted by applicable law. Further information about the retention period is available here:

### **Data collected via tag**

Technical cookies

### **Retention period**

Max 3 years

### **Starting date**

From the date of browsing on our websites

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### **Data collected via tag**

Non-technical cookies

### **Retention period**

Max 1 year

### **Starting date**

From the date of browsing on our websites

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## 9. Cookies management

### **9.1 How do I disable/enable Cookies?**

By modifying your browser settings, you can opt to disable Cookies or receive a notification before accepting them. You can also erase all Cookies installed in your browser's Cookie folder. Keep in mind that each browser has a different procedure for managing and configuring Cookies. Here's how you manage Cookies in the various major browsers:

- [MICROSOFT WINDOWS EXPLORER](#)

- [GOOGLE CHROME](#)
- [MOZILLA FIREFOX](#)
- [APPLE SAFARI](#)

If you use another browser, please read its help menu for more information.

If you would like information about managing Cookies on your tablet or smartphone, please read the related documentation or help archives online.

### **9.2 How are third party Cookies enabled/disabled?**

We suggest that you consult the Third Party's Website for more information on managing any third party Cookies that are installed. However, we invite you to visit the following website <http://www.youronlinechoices.com/> where you can find useful information about the use of Cookies as well as the measures you can take to protect your privacy on the internet.

### **9.3 How do I disable Web Push Notifications?**

You can disable Web Push Notifications through your browser:

**Chrome:**

<https://support.google.com/chrome/answer/3220216?co=GENIE.Platform%3DDesktop&hl>

**Firefox:** <https://support.mozilla.org/en-US/kb/push-notifications-firefox>

**Microsoft Edge:**

<https://support.microsoft.com/en-us/help/10761/windows-10-change-notification-action-settings>

**Apple Safari:** <https://support.apple.com/en-gb/guide/safari/sfri40734/mac>

## **10. Contact details of the data controller and your data protection rights**

The contact details of the Data Controller of the data processing described hereinabove are:

BravoNext, S.A., Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland.

You can check further information on how BravoNext, S.A. processes personal data and information on the rights granted by the GDPR, by reading the Privacy Policy available at <https://www.lastminute.com/en/info/privacy/bravonext.html>.

# 11. Contact details of our data protection officer (DPO)

Our Data Protection Officer (or "DPO") is available at:

- [dpo.en@lastminutegroup.com](mailto:dpo.en@lastminutegroup.com)
- by post mail: Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland.