

INFORMATION REGARDING COOKIES

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1. Introduction

This Cookies Policy provides you with information about the cookies and other similar technologies (hereinafter, collectively referred also to as “Cookies”) that are used on our website (“Website”) and our mobile application (“App”), hereinafter also “Properties”, so that you may better understand the use of Cookies during your navigation and provide your consent thereto.

2. Who is the controller of your data?

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

BravoNext, S.A., a Swiss company belonging to the lastminute.com group, listed in the Ticino business register under no. CHE - 115.704.228 and with registered office at Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland, which is the controller for the processing of Users' and/or Customers' personal data under this Cookies Policy.

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 25 September 2020 (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 similar technologies?

Cookies are small text files which are stored on your computer, hard drive, smartphone or tablet (hereinafter referred to as, "Device"). 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 our Properties 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 visits to a website or App can be analysed.

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 our Properties.

Furthermore, by implementing the cookies and other similar technologies described above, if you return to our Properties, this can read and recognise such technologies, which primarily are used to operate or improve the way our Website or App works as well as to provide business and marketing information to the Website owner.

4. Authorisation for the use of Cookies on our Website or App

In accordance with the notice of Cookie usage appearing on our Website's homepage (or before starting to use our Apps) and our Cookie Policy you agree that, if you click the button "Accept all" or "Allow all" of our Cookie banner, you consent to the use of Cookies described herein, except to the extent that you have set your preferences through the "Review settings" 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 Website and use our Comparison Service or when you access our Apps (you as a "User") the following categories of personal data are collected:

- Information about your visits to and use of the Website and/or of our services, such as information about the Device and browser you are using, your IP address or domain names connected to the Websites, uniform resource identifiers for requests made, 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.) and other parameters relative to the operating system and the computer environment used, the date and time that you visited, the duration of your visit, the referral source and website navigation paths of your visit and your interactions on the Website including the services and offers you are interested in. We may also collect an hashed version of your email address (hashed email) and temporarily share with [selected partners](#), either as joint controllers or as our data processors. Hashing an email involves using an algorithm (such as SHA256) to convert that email address into a 32 character code that is unique to a given email address through a process of pseudonymization. External partners use this information to create an online identification code in order to recognise you on your devices when browsing. This code does not contain any personal data that directly identifies you. The collection of hashed email addresses helps us to improve the security of user data by using encryption methods, understand how users interact with our Website and provide tailored content and personalised ads. This code may be shared with our advertisers and other third party companies in order to enable the delivery of content or advertising based on your interests throughout your online experience (e.g., on the web, via email, through connected devices, within apps, etc.). These third parties may in turn use this code to link demographic or interest-related information that you have provided in the course of your interactions with them.

Please note that we may associate this information with your account.

- **Location data:** subject to the User's consent, and only for the duration of the browsing session on the website, we may access the User's location via the connection IP address used by the User to browse our Properties. If the App is used, subject to the specific authorisation that the User gives the operating system of their device, we may access the location data provided by the device's GPS. The methods of processing personal data carried out by the device's operating system can be consulted in the device's settings. If the User wishes to revoke the authorisation or modify the information that their device's operating system is authorised to share with our App, they must access the device's Settings.

Please see the following clause of this Policy for further information on the purposes for which we collect and use this information.

6. Types of Cookies used on our Website

6.1. Types of Cookies according to the managing entity

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

- **First party Cookies:** these are sent to your Device from a website or domain managed by us 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 that is not managed by us, but by a separate entity that processes data obtained through Cookies.

6.2. Types of Cookies according to the length of time you stay connected:

Depending on the amount of time you remain active on your Device, these are the following types of Cookies:

- **Session Cookies:** these are designed to receive and store data while you access the Website. These Cookies do not remain stored on your Device when you exit the browser session or the Website.
- **Persistent Cookies:** these types of Cookies remain stored on your Device and can be accessed and processed after you exit the Website as well as when you navigate on it for a pre-determined period of time. The Cookie remains on the hard drive until it reaches its expiration date. The maximum time we use persistent Cookies on our Website is 1 year. At this point the browser would purge the Cookie from the hard drive.

6.3. Types of Cookies and other similar technologies according to their purpose

Cookies and other similar technologies (collectively “Cookies”) can be grouped as follows:

- **Technical Cookies:** these Cookies are strictly necessary for the operation of our Website or our App and are essential for browsing and allow the use of various features. Without them, for example, you cannot use the search and comparison tools, maintain your currency preference, log.in and use your personal account or book services. We use these cookies also to measure traffic statistics and the performance of different versions of the same website (commonly called "A/B tests") to detect navigation problems and organize the content, as well for security purposes.
- **Personalisation, advertising and retargeting Cookies:** subject to the User's consent, these Cookies are used by us or by third parties who use cookies and other similar tracking technologies on our Properties, to collect and process information related to the use by the User and/or the Customer of our services and content, or interaction with ads, in order to:
 - i) improve the browsing experience by displaying personalised content and features (such as displaying the nearest airport);
 - ii) display personalised ads.

When the User uses the services and features available on our Properties or clicks on an ad, we and third parties, separately and also in combination with previously collected information, may carry out profiling activities on the User and/or the Customer and their interests, to display the aforementioned personalised features, content and/or ads on our Properties or on other websites, which we believe may be useful or of interest to the User. To this end, we may also use the services provided by third parties on our behalf to collect data and/or offer ads during the visits of the User and/or the Customer to our Properties, in order to display content or ads relating to goods and services that we believe may be useful or of interest to them. This could include personalisation, i.e. collecting and processing information related to the interests of the User and/or the Customer in order to personalise, at a later date, ads and/or content for the User and/or the Customer in other contexts, such as on other websites or apps. The information collected does not include directly identifying the user (it does not include, by way of example, the name, address, email address or phone number of the User and/or the Customer).

We emphasise that 'third-party cookies' are not managed by us and, due to their operation, are not accessible by us. We are also not responsible for their management and their purpose. However, these companies use information that is not directly identified (which does not include, by way of example, the name, address, email address or phone number of the User and/or the Customer). Article 7 of this Cookies Policy contains more information on who the aforementioned third parties are, on their methods and purposes of processing, and on the opt-out mechanism.

We may also collect your hashed email and temporarily share with [selected partners](#) in order to enable the delivery of personalised features, content and/or advertisement based on your interests throughout your online experience, on our Properties or on third-party websites, including social networks (e.g. Facebook, Instagram). In the dedicated section of the Website with the list of our [selected partners](#) you can find the link to their privacy policy and opt-out mechanism.

- **Measurement Cookies:** These Cookies are used by us and third parties to collect information on the use by the User and/or the Customer of the content of our Website or the App and its combination with previously collected information, to measure, understand and report on the use of the services and measure the User's interaction with ads, such as which ads were displayed, how often they were displayed, when and where they were displayed and whether the User and/or Customer took any action related to the ad, including clicking on an ad or making a purchase. This does not include personalisation, i.e. collecting information on the use of this service by the User and/or the Customer, in order to later personalise the content and/or ads for the aforementioned User and/or Customer in other contexts. For the same purposes, we may also collect your Hashed Email and temporarily share with [selected partners](#) in order to understand how you interact with our Website. In the dedicated section of the Website with the list of our [selected partners](#) you can find the link to their privacy policy and opt-out mechanism.
- **Social Network Cookies:** these Cookies allow you to share our Website content and your "Like" on social networks like Facebook, Twitter and YouTube, etc. They also allow you to interact with each distinct platform's contents. The way these Cookies are used and the information gathered is governed by the privacy policy of each social platform, which you can find on the list below in Article 7 of our Cookie Policy.
- **Data transfer to third countries:** these Cookies allow the transfer of your personal data to third countries that do not ensure an adequate level of protection of the rights and freedoms of natural persons with regard to the processing of personal data, included to countries that are not covered by an adequacy decision and where certain extra-EU national programmes may enable public authorities to have access to your personal data. To this aim, here you can find more information on the transfer of data to third countries not covered by an adequacy decision.

Purpose of the transfer: third parties based in third countries may collect personal data via cookies or other tracking technologies when you visit our Website, in order to target you with personalized advertising.

Type of data transferred: information about your visits to and use of the Website and/or of our services, such as information about the Device and browser you are using, your IP address or domain names connected to the Websites, uniform resource identifiers for requests made, , 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.) and other parameters related to the operating system and the computer environment used, the date and time that you visited, the duration of your visit, the referral source and website navigation paths of your visit and your interactions on the Website including the services and offers you are interested in.

Identity or the categories of recipients: the data may be transferred to Ad-tech providers and other actors who place their cookies or other technologies on our Properties, who are based in third countries and which operate in the provision of ad-targeting options. The list of these actors may be found at Article 7 of this Cookie policy.

Risk of the transfer:

- with reference to the transfer to the **USA**

This transfer doesn't ensure an adequate level of data protection recognized by Switzerland. Data transfer to this country requires the use of transfer tools.

The legal ground is your explicit consent. Once Switzerland approves the Data Privacy Framework with the USA, the legal basis will be the framework if the partner is certified under it. If the partner is not certified, the legal ground will remain your explicit consent.

- with reference to the transfer to **Australia**: this transfer doesn't ensure an adequate level of data protection recognized by the EU. Data transfer to this country requires the use of transfer tools. This country has a data protection law and an independent data protection authority accredited at the international conference of data protection and privacy commissioners (www.oaic.gov.au);

Legal ground for the transfer: your explicit consent, where conferred (art. 49 GDPR paragraph 1 lett a);

- with reference to the transfer to **Singapore**: notwithstanding the existence of general legislation on data protection or specific provisions, the transfer to this country doesn't ensure an adequate level of data protection recognized by the EU. Data transfer to this country requires the use of transfer tools (<https://www.pdpc.gov.sg/>);

Legal ground for the transfer: your explicit consent, where conferred (art. 49 GDPR paragraph 1 lett a);

- with reference to the transfer to **Thailand**: notwithstanding the existence of general legislation on data protection or specific provisions, the transfer to this country doesn't ensure an adequate level of data protection recognized by the EU. Data transfer to this country requires the use of transfer tools (Authority for the protection of Personal Data Information Commission, Government House, Bangkok 10300 Thailand);

Legal ground for the transfer: your explicit consent, where conferred (art. 49 GDPR paragraph 1 lett a);

- with reference to the transfer to the **United Arab Emirates**: the transfer to this country doesn't ensure an adequate level of data protection recognized by the EU. Data transfer to this country requires the use of transfer tools;

Legal ground for the transfer: your explicit consent, where conferred (art. 49 GDPR paragraph 1 lett a).

- with reference to the transfer to **Mexico**: this transfer doesn't ensure an adequate level of data protection recognized by the EU. Data transfer to this country requires the use of transfer tools. This country has a data protection law and an independent data protection authority accredited at the international conference of data protection and privacy commissioners (<https://micrositios.inai.org.mx/gobiernoabierto/en>);

Legal ground for the transfer: your explicit consent, where conferred (art. 49 GDPR paragraph 1 lett a).

7. List of Cookies used on this Website

To see the list of Cookies used on this Website, click here <https://www.lastminute.com/info/list-cookies.html>.

The information contained in the above list has been provided by the other companies which generate them. These companies have their own privacy policies in which they set forth both their own declarations as well as applicable disabling systems.

The lastminute.com group is not responsible for the contents and accuracy of third party cookie policies contained in our Cookie Policy.

8. Why do we collect your data?

Why?

- A. To create and maintain the contractual relation established for the provision of the Service requested by you 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 anonymous, aggregative statistical analyses so that we can see how our Website, products and services are being used and how our business is performing.

On which legal basis?

On the “strictly necessary” exemption (where applicable, i.e. improving the operations and the day by day administration of our Website or applications) or where you give your consent through the Cookie banner or by your browser's settings or, where allowed, on the basis of legitimate interest.

Why?

D. To tailor and personalise services, content, ads and online marketing notifications (push notifications on the web), based on information collected through Cookies installed by us or third parties and related to the use that the User and/or the Customer makes of our Website, products and services and related to browsing by the User and/or the Customer on other sites.

On which legal basis?

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

Why?

E. To allow the User and/or Customer to share the content of our website and 'Likes' (where available) on social networks such as Facebook, Twitter, Google+, YouTube, etc. and allow interaction with the content of each individual platform.

On what legal bases?

Where the User and/or the Customer gives their consent (i.e. through the Cookie banner or browser settings).

On which legal basis?

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

Why?

F. To transfer personal data to countries that do not ensure an adequate level of protection of the rights and freedoms of natural persons with regard to the processing of personal data, included to countries that are not covered by an adequacy decision and where certain extra-EU national programmes may enable public authorities to have access to personal data.

On which legal basis?

Where you give your consent (i.e. through the Cookie banner)

9. 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 Website or App

Data collected via tag

Non-technical Cookies

Retention period

Max 1 year

Starting date

From the date of consent

10. Cookies management

You must keep in mind that if your Device does not have Cookies enabled, your experience on the Website may be limited, thereby impeding the navigation and use of our services.

10.1 How do I disable/enable Cookies?

There are a number of ways to manage 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.

10.2 How are third party Cookies enabled/disabled?

We do not install third party Cookies. They are installed by our partners or other third parties when you visit our Website. Therefore, we suggest that you consult our partners' Websites 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. We also collaborate with advertising and marketing companies that are members of the Network Advertising Initiative (NAI) and/or the Interactive Advertising Bureau (IAB). These organisations provide tools to opt-out of behavioural advertising. To check if NAI members have placed cookies on your device and manage preferences, visit www.networkadvertising.org. Please note that opting out doesn't eliminate all ads but stops networks from showing personalised ones based on your browsing habits.

10.3 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>

11. 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., a Swiss company belonging to the lastminute.com group, listed in the Ticino business register under no. CHE - 115.704.228 and with registered office at 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://res.cloudinary.com/lastminute-contenthub/image/upload/v1/DAM/Legal/Whitelabels/Vibra/EN/privacy-policy.pdf>.

12. Contact details of our data protection officer (DPO)

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

- dpo.en@lastminutegroup.com
- Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland.