

# Privacy Policy

Last updated **November 2019**

We recognise the importance of protecting your privacy and your rights with regards to data protection. The Internet is a very powerful medium when it comes to transmitting personal information; for that reason, we and all other companies belonging to the lastminute.com group ("Im group") undertake the serious task of respecting the current laws regarding the protection of personal data and the security of the same, with the aim of guaranteeing secure, controlled and confidential navigation for its users and customers who visit and/or use the Website and/or use our Comparison Service (you as a "User") or then purchase or register on our services, download our app and/or give us their consent for a specific purpose (you as a "Customer").

This Privacy Policy describes how we collect, use, process, and disclose your personal data in conjunction with your access to and use of our Website and services and, specifically:

- 1. Who is the controller of your data?**
- 2. What categories of your data do we collect and use?**
- 3. Why and how do we collect your data?**
- 4. Who sees, receives and uses your data and where?**
- 5. How long do we retain your data?**
- 6. What are your data protection rights and how can you exercise them?**
- 7. Contact details of the data controller**
- 8. Contact details of our data protection officer**
- 9. Information about cookies**
- 10. Privacy notice for Facebook**
- 11. Update and old versions of this privacy policy**

It also informs you of how you can exercise Your Rights (including the right to object to some of the data handling we carry out). More information about your rights and how you can exercise them is set out in the section below.

If you see an undefined term in this Privacy Policy (such as "Service" or "Website"), it has the same definition as in our Company contractual service conditions.

## **1. Who is the controller of your personal data?**

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

BravoNext, S.A., a Swiss company belonging to the Im 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 responsible for the processing of Users' and/or Customers' personal data under this Privacy Policy (hereinafter, referred to as the "Company", "we", "us", "our", "Data Controller"). Furthermore, we inform you that, for compliance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") purposes only (Art. 27 GDPR), Bravonext has designated as its EU representative Viaggiare SRL., an Italian company belonging to the Im group, listed in the Italian Chamber of Commerce - Milano under VAT identification no. IT04403760962 and with registered office at Via Melzo 12, 20129 Milan, Italy.

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 General Data Protection Regulation (EU) 2016/679 ("GDPR") and 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.

In accordance with Swiss Federal Act on Data Protection of 19 June 1992 and with Article 45 of the Swiss Federal Act on the Supervision of Insurance Companies of 17 December 2004 (FASIC) we inform our Users and/or Customers that their personal data is processed and kept by the Company in the manner and for the means as follows, in accordance with the LPD and LSA.

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

When you visit the Website and use our Comparison Service (you as a "User") or then purchase or register to our services (you as a "Customer") we collect the categories of personal data as follows:

### 2.1. Personal data provided by you

- The personal data that you share with us including when you register for an account, subscribe to marketing communications and which you provide to us when using our services, downloading our app, including the information entered into our booking platform and included in your comments, reviews or messages sent via telephone to our Customer Care Team, or through the Live Chat or through social media channels.
- More specifically:
  - When you book with us, you may provide us with information such as:
    - Passenger information, passport details, contact details, payment details (i.e. credit data, billing address, account information), date of birth etc.
    - Information about your purchases, including what you booked, when and where you booked it and how you paid for it.
    - Special categories of personal data, for example, relevant medical data and any special dietary or disability requests, so information concerning your health or revealing religious, philosophical or sexual orientation that you might voluntarily provide us in the course of making a booking by selecting the box "special transportation need" and filling in the empty field or by other means, such as via telephone to our Customer Care Team or through the Live Chat or at any moment when making a booking. We will use the special categories of personal data only as strictly necessary to fulfil your request. Where we need to process this data, we will only do it if we have your explicit consent, in accordance with Art.6.1.a) and Art. 9.2 GDPR or if permitted by regulations.
  - When you contact us or we contact you through the Live Chat, the Customer Care Team via email, post and/or phone or through social media we may collect: personal data you provide when you connect with us, including your name, username, phone number, email.
  - When you take part in surveys or questionnaires about our services you may provide us with your contact details, your feedback and contributions to customer surveys and questionnaires.
  - When you subscribe to the personalised marketing services under p.3 - F of this privacy policy you may provide us with: Your personal details, information about your purchases, including what you booked, information about when you click on our adverts, the way you access the website, including IP address, online identifiers and browsers details. You may also provide us with information about your bookings, your browsing behaviour or your personal interests. Please note that some of this information might be collected automatically in accordance with p. 2.2.

- When you register for an account into the Personal Area, or you use your Account you may provide us with: your personal details such as your name, surname, email, address, phone number, profile picture and your login information as your email and the password you choose. Please, check p. 2.3. of this privacy policy in case you register or access the Personal Area services using your social network credentials. Please, note that when you sign into your registered personal account, you will remain logged-in to the Personal Area page for a period of sixty days or until you choose to log out of your account. The company providing this service on all the websites within the Im group is BravoNext, S.A. a Swiss company belonging to Im group, listed in the Commercial Register of Canton Ticino under Identification number CHE-115.704.228 and with registered office at Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland. Before completing the registration process, you must confirm that you have read and accept the specific Privacy Policy and Terms and Conditions of BravoNext, S.A. for this service.
  - When you download and use our app: We do not collect directly personal details from you. However, please, note that some information will be share with Facebookp. 11.2 of this Privacy Policy). By installing our App you declare that you have read and accept the Privacy Policy and Terms and Conditions of our App.
  - When you consent to take part in promotions, competitions, contests you may provide us with: your personal details, including your address, email or phone number or eventually any other data that may be necessary to take part on the specific case. We will inform you about the privacy policy of the specific promotions, competitions or contests as soon as the promotions start.
  - When you consent to be subscribed to our marketing communications via WhatsApp, you may provide us with: your name and phone number. Before subscribing to marketing communications via Whatsapp you have to read and accept the specific privacy policy for the WhatsApp communications.
- Personal data you provide about other individuals: If you plan to submit someone else's personal data to us, for instance when booking on their behalf, you should only provide us with that third party's details with their consent and after they have been given access to this Privacy Policy. When submitting data about other individuals you declare you have their consent
  - Personal data about children: Please note that we may collect and use the information of children only as provided by their parent or guardian or with their consent. If we become aware that we have processed information of a child without the valid consent of a parent or guardian, we reserve the right to delete it.

The provision of the above personal data, where requested, is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations except when we rely on consent as legitimate basis for processing and or our legitimate interest. Without it, we may not be able to provide you with all the requested services.

It is important that all the personal data you give us is correct and accurate. This includes, by way of example only, ensuring that we have your correct contact (including email) details at all times.

## **2.2. Personal data collected automatically from our Website, on the phone, from communication we send, and/or from third parties**

- We collect information about your visits to and use of the Website, such as information about the device and browser you are using, your IP address or domain names of the computers connected to the Websites, 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.) 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. Please note that we may associate this information with your account.

See the cookies section of this Privacy Policy (9. Information about cookies) for further information on the purposes for which we collect and use this information. Please note that, your personal information may also be linked to Cookies to i.e. enable the storage of your travel searches on your Personal Account when you are registered to the service and/or collect information on how you use our product and services.

- We may record or monitor calls to and from our Customer Care Team for contractual reasons, quality control purposes, analytics, for staff training and/or to protect us in the event of a legal dispute. Any personal data obtained from you during the call will be treated in accordance with this Privacy Policy.
- We may use this style to also understand how you engage with communication material that we send to you, such as emails, including the action you take such as any links in them that you click on, your duration and frequency of your engagement with the email.
- To the extent permitted by the applicable law wherein we receive additional information about you, such as fraud detection information and warnings from third party service providers and/or partners for our fraud prevention activities.

## **2.3. Other sources of personal data: Facebook log-in and Google sign-in when registering and/or using your account into the Personal Area**

You may create and use the Personal Area through our login system or you might choose to link, connect or login to the Personal Area with a third party service (e.g., Facebook, Google), the third party service may send us information such as your registration and profile information (i.e. user name, user ID associated with your social media account, picture, email), and any other information you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network. You should always review and, if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our Website.

In particular:

### **Facebook log-in**

- When you choose to register and/or log-in using Facebook to connect to our platforms of services on our Website, either when you register or after you have registered, you agree to share your name, email, profile picture, user ID associated with your social media account with us. We will also record the fact that you have registered through Facebook.

Information about your activity on our Website may be sent to Facebook, when you have an account with them and choose to use the social media login feature to register with us.

The social media platform may receive information, such as your IP and the browser URL.

For more information on the collection and use of data by Facebook, about your rights in this regard and ways to protect your privacy, see the privacy policy of Facebook <https://www.facebook.com/policy.php>

### **Google log-in**

- When you log-in using Google to connect to our platforms or services you agree to share your email and your picture profile. We will also record the fact that you have registered through Google.

The social media platform may receive information, such as your IP and browser URL.

Please review Google's privacy policy to find out more about your rights in this regard and ways to protect your privacy: <https://policies.google.com/privacy>

### **3. Why do we collect your data?**

In general terms, we use your personal data to provide you with the services you request, process payment, provide customer services, send you marketing and promotional communications, notify you about important changes to our Website and to deliver our content and ads which we think may be of interest to you. More specifically:

#### **Why?**

A. To create and maintain the contractual relation established for the provision of the product and/or service (the "Service") requested by you in all its phases and by way of any possible integration and modification or to take steps at your request in relation to the contract prior to entering into contract (e.g. facilitating your bookings and taking payments; responding to your questions and concerns; administering your account). Information concerning our provision of the Service and/or to provide you with any clarification or assistance may be sent to you via email, phone, SMS, recorded calls or other similar technologies.

Please note that if your call to us is not connected, or if it is disconnected mid-call, you authorise us to use your phone number to call you back, in order to respond to your request.

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

To fulfil a contract, or take steps linked to a contract

(i.e. To provide the products and/or the services you request and/or to provide you with any clarification or assistance to you)

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#### **Why?**

B. If permitted by the applicable law, to request your participation in our surveys conducted via email phone, SMS, recorded calls or other similar technologies from time to time, so that you can tell us about your experience as a recipient of the Service. We will use your feedback to develop and improve our services. Following our analyses of your feedback, we may consider it necessary to contact you to provide you with a response to your survey submission. You can inform us at anytime if you no longer want to receive our surveys by writing to [privacy.en@lastminutegroup.com](mailto:privacy.en@lastminutegroup.com). Please note that your participation in the survey is voluntary and there is no consequences should you prefer not to participate.

**On which legal basis?**

To pursue our legitimate interest (i.e. To manage and improve our products, services and day by day operations)

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**Why?**

C. 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 (i.e. to share personal data with regulatory authorities)

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**Why?**

D. To carry out aggregative statistical analyses on anonymised groups or to analyse identifiable individuals behaviour so that we can see how our Website, products and services are being used and how our business is performing.

**On which legal basis?**

To pursue our legitimate interest (i.e. improving our Website, its features and our products and services)

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**Why?**

E. To send you (in cases permitted by law excepting where you did not object) advertising material via email or, where permitted by the law, other equivalent electronic communication regarding products and services similar to those already purchased by you and offered on our Website. On some occasions, we may send you a personalised and tailored version of the aforementioned advertisement materials.

**On which legal basis?**

Soft Opt-in/To pursue our legitimate interest (i.e. marketing)

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## Why?

F. To send you personalised and profiled marketing communications

Without prejudice to the provisions of the preceding paragraph E, and only with your previous consent, to share with you via email, phone, mail, SMS, and on our website or third party ones (e.g. using ads and/or Web Push Notifications) the best deals and offers on products and services we think you might find interesting because they are suited to your interests. The individualised service or the offers can be marketed by us or our partners or business partners operating in the following sectors: tourism, leisure, entertainment, high technology, fashion, decoration, consumer goods, food and beverage, finance, banking, insurance, energy, environment, communication, mass media, real estate, pharmaceuticals, clothing and textiles, education and training, energy, publications and publishing, information and communications technology, retail, sport, telecommunications and general services.

For this purpose we may:

- analyse your personal information to create a profile of your interests and preferences so that we can tailor and target our communications in a way that is timely and relevant to you.
- combine the information you give us via cookies with information related to your purchases and information we receive from third parties that collect your data through various means agreed by you. You can find information about third parties on this link[1]
- analyse information about the way you engage with communication material you receive from us, such as data on when emails have been opened or to determine if you have viewed or interacted with an ad, to record the number of times you have viewed each ad, to prevent a single ad being shown to you too frequently etc.
- temporarily share an encrypted version of your email address, with carefully selected partners who may combine this information with other forms of online identifiers or other personal data in order to present you with our offers cross device or cross channel, for example on social networks (Facebook, Pinterest, Instagram, twitter).
- use automated decision making to segment and target product offers based on your demands and needs. This allows us to be more focused, efficient and cost effective with our resources and also reduces the risk of someone receiving information they may find inappropriate or irrelevant. You can always request a manual decision- making process instead, express your opinion or contest decision based solely on automated processing, including profiling, if such a decision would produce legal effects or otherwise similarly significantly affect you. For further details, you may contact our Data Protection Officers whose details are provided in this privacy policy.

**On which legal basis?**

Where you give your consent (by ticking the appropriate check box)

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**Why?**

G. Passing your data to BravoNext, S.A. to collect and obtain the information about your bookings from the Data Controller with which you have contracted, in turn authorising this company to share this information to BravoNext, S.A.; this will facilitate the search and location of bookings you have made with any company of Im group on any of the Websites of the Im group through the APP or as a User of the Personal Area.

**On which legal basis?**

To fulfil a contract, when you register or log into the APP or Personal Area with BravoNext, S.A. via the website or the App

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**Why?**

H. To keep our Website and systems secure and to prevent and detect fraud, security incidents and other crime.

**On which legal basis?**

To pursue our legitimate interest (i.e. ensuring the security of our Website)

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**Why?**

I. To verify compliance with our terms and conditions and for the establishment, exercise or defence of legal claims.

**On which legal basis?**

To pursue our legitimate interest (i.e. compliance with our terms and conditions, protection of our rights in the event of any dispute or claim)

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**Why?**

J. To tailor and personalise online marketing notifications and advertising for you based on the information on your use of our Website, products and services and other sites collected through cookies (please see the Cookies section of this Privacy Policy for further information)

**On which legal basis?**

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

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**Why?**

K. If permitted by the applicable law, to record or monitor calls to and from our Customer Care Team for contractual reasons, quality control purposes, analytics, for staff training and/or to protect us in the event of a legal dispute.

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

To pursue our legitimate interest(i.e. improving our Website, its features and our products and services)

## **4. Who sees, receives and uses your data and where?**

### **4.1. Categories of recipients of your data**

We share your personal data, for the purposes described in this Privacy Policy, to the following categories of recipients:

- Our authorised employees and/or collaborators that assist and advise us on administration, products, legal affairs, Customer Care Team, and information systems, as well as those in charge of maintaining our network and hardware/software equipment;
- Airlines, hotels, car hire companies, insurance companies, tour operators as well as those other parties to which it is necessary to disclose your personal data in order to provide you with the requested services that will be operating as autonomous data controllers. Please note that airline companies are required, in accordance with new regulations introduced in the US and other countries, to allow customs and border authorities to have access to flight passenger data. For that reason, in certain situations, we may communicate data collected on passengers included in the reservation to the competent authorities of the countries included in the Customer's travel itinerary if required by the local law.
- Our third-party service providers (including other entities of the lmastminute.com group), which process your personal data on our behalf and under our instructions for the purposes described hereinabove acting as data processors, such as those providing us with IT and hosting services call centre and customer support, analytics and administration services etc.
- Payment providers and financial institutions (e.g. for chargeback, fraud detection and prevention purposes) acting as autonomous data controllers.
- Our business partners who are social media platforms when it is explicitly requested by you (e.g. when you share information generated from our website onto those platforms), when using social media authentication methods or downloading our App whereby you agree either with our privacy policy or with the platforms that we may share information about your online activity with these partners even when you are not logged in to the social media platform). or when these business partners that provide us with functionality capabilities request information about the specifications of the device that the App has been installed on, which they have obtained the right to do. The information you share will be governed by the social media's privacy policy. Please check clause 2.3 of this Privacy Policy for more information.
- Competent authorities when we are required to do so by the current law.
- Competent authorities and Law and enforcement third parties when this is necessary so that we can enforce our terms of use and protect and defend our rights or property or the rights or property of any third party.
- Third parties that receive the data (e.g. business consultants, professionals for delivering due diligence services or assess value and capabilities of the business) when it is necessary in connection with any sale of our business or its assets (in which case your

details will be disclosed to our advisers and any prospective purchaser's advisers and will be passed to the new owners.

The complete list of parties to which your personal data may be disclosed is available at our registered office and may be requested by writing to [privacy.en@lastminutegroup.com](mailto:privacy.en@lastminutegroup.com).

#### **4.2. International transfer of your data**

Users' and/or Customers' personal data is processed in at the Data Controller's registered office (see point 1), on the Im group servers, and at the offices of other entities to which data may be provided in order to provide the services requested of the Data Controller.

Given the fact that we are an international travel company, we also transfer your personal data to:

- non-European Economic Area (EEA) countries offering an adequate level of data protection such as Switzerland in accordance with the "Adequacy decisions" of the EU Commission that recognises some countries as providing adequate protection;
- non-European Economic Area countries where data protection laws may be less protective than the legislation in the EEA. This happens when:
  - we disclose your data to autonomous data controllers such as airlines, hotels, car hire companies, tour operators etc. that might process your data outside the EEA in order to provide you with the requested services.
  - we disclose your data to our service providers who act as data processors on our behalf that might be located in a country outside the EEA, including Morocco, Albania, UK, India and Tunisia. When such a transfer happens, we ensure that it takes place in accordance with this Privacy Policy and is regulated by standard contractual clauses approved by the European Commission as ensuring adequate protection for data subjects. Our providers, acting as data processor, may be engaged in, among other things, the fulfilment of your service request, the processing of your payment details, the provision of advertising and marketing services on our behalf and the provision of support services through electronic communications or call centre.

Should you want to obtain further details about the safeguards put in place, you can contact us by writing to [privacy.en@lastminutegroup.com](mailto:privacy.en@lastminutegroup.com).

#### **5. 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 Privacy Policy, otherwise communicated to you or for as long as is permitted by applicable law. Further information about the retention period is available here:

### **CUSTOMER RECORDS**

#### **Document**

Booking records (name, address, contact information, PNR, ID Booking, birth date, number or identity document, date of issue, date of expiring,

issuer country, typology ) including:

- Product details

- records of customer contacts related to the Agent section (i.e. Notes/Events in the BO),

- purchase data
- Checkout "Special request" section

**Retention period**

10 years

**Starting date**

From the date of the purchase

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**Document**

Account information (see My Area) - **Retention period: 10 years from the date of the last interaction**

- User, password
  - Social login
  - Purchase data - **Retention period: 3 years from the date of the purchase**
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**Document**

Customer care emails (confirmation, schedule change/cancellation, quotation, penalties quotation, payment reminder, refund choice, voucher/payment, massive communications), including customer requests/claims via email

**Retention period**

10 years

**Starting date**

From the date on which email is sent

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**Document**

Customer care phone records for contractual reasons

**Retention period**

3 years

**Starting date**

From the date of the recording

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**Document**

Recorded calls for quality purposes

**Retention period**

1 month

**Starting date**

From the date of the call

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**Document**

Chat (Customer/User)

**Retention period**

3 years

**Starting date**

From the date of the request

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**Document**

Reports or claims

**Retention period**

10 years

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**Document**

Contractual documentation (log of the acceptance)

**Retention period**

10 years

**Starting date**

From the date of the purchase

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**Document**

Cleartext credit card data

**Retention period**

Not retained

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**Document**

Finance/transactional information

**Retention period**

10 years

**Starting date**

From completion of financial transaction

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**Document**

Transactional fraud check data

**Retention period**

5 years

**Starting date**

From rejection of transaction for fraud

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**Document**

Surveys

**Retention period**

1 month

**Starting date**

From the date of the survey

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**DATA USED FOR MARKETING PURPOSES (CRM)**

**Document**

Data used for marketing activities to customers/users subject to the consent or under soft-opt in

**Retention period**

5 years

**Starting date**

From the consent or the renewal of the consent via interaction with marketing communications

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## DATA COLLECTED VIA TAG

### Document

Technical cookies

### Retention period

Max 3 years

### Starting date

From the date of browsing on our websites

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### Document

Non-technical Cookies

### Retention period

Max 1 year

### Starting date

From the date of consent

## 6. What are your data protection rights and how can you exercise them?

You can exercise the rights provided by the Regulation EU 2016/679 (Articles 15-22), including

### Name of the right

Right of access

### Content

To receive confirmation of the existence of your personal data, access its content and obtain a copy.

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### Name of the right

Right of rectification

### Content

To update, rectify and/or correct your personal data.

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**Name of the right**

Right to erasure/right to be forgotten and right to restriction

**Content**

To request the erasure of your data or restriction of your data which has been processed in violation of the law, including whose storage is not necessary in relation to the purposes for which the data was collected or otherwise processed; where we have made your personal data public, you have also the right to request the erasure of your personal data and to take reasonable steps, including technical measures, to inform other data controllers which are processing the personal data that you have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

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**Name of the right**

Right to data portability

**Content**

To receive a copy of your personal data you provided to us for a contract or with your consent in a structured, commonly used and machine-readable format (e.g. data relating to your purchases) and to ask us to transfer that personal data to another data controller.

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**Name of the right**

Right to withdraw your consent

**Content**

Wherever we rely on your consent (see p. 3 - F and J), you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes.

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**Name of the right**

Right to object, at any time

**Content**

You have the right to object at any time to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement (see p. 3-B, C D, H, I), or where we are using your data for direct marketing (p. 3-E).

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**Name of the right**

Right not to be subject to a decision based solely on automated processing, including profiling

## **Content**

You can always request a manual decision-making process instead, express your opinion or contest decision based solely on automated

processing, including profiling, if such a decision would produce legal effects or otherwise similarly significantly affect you.

You can exercise the above rights at any time by:

- Contacting us via email at [privacy.en@lastminutegroup.com](mailto:privacy.en@lastminutegroup.com).
- As for direct marketing, please note that you can also object at any time by clicking the unsubscribe link which we provide in each communication sent to you
- As for online targeted ads and the withdrawal of your consent please refer to our Cookie section of this Privacy Policy.

In case you exercise any of the above rights provided by GDPR, please note that we will attend your request considering the personal information held by all the companies within the Im group where BravoNext, S.A. holds, directly or indirectly, 100% of the shares.

Your rights in relation to your personal data might be limited in some situations. For example, if fulfilling your request would reveal personal data about another person or if we have a legal requirement or a compelling legitimate ground we may continue to process your personal data which you have asked us to delete.

You also may have the right to make a complaint if you feel your personal information has been mishandled. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant Data Protection Supervisory Authority.

## **7. Contact details of the data controller**

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

BravoNext, S.A., a Swiss company belonging to the Im 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.

## **8. 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)

Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland

## **9. Information about Cookies**

### **9.1 What are cookies and other similar technologies ("Cookies")?**

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 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 visits to a website 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 Website.

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

## **9.2 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” or “Allow” 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.

## **9.3. 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") we collect the following categories of personal data:

Personal data collected automatically from our Website and from third parties

- Information about your visits to and use of the Website, such as information about the Device and browser you are using, your IP address or domain names of the computers connected to the Websites, 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.) 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. Please note that we may associate this information with your account.

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

## **9.4. Types of Cookies used on our Website**

### **9.4.1 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.

#### **9.4.2 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.

#### **9.4.3 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, you cannot use the search function, compare tool or book other available services on our Website or on our App.
- **Personalisation Cookies:** these are used to make navigating our Website or our App easier, as well as to remember your selections and offer more personalised services. In some cases, we may allow advertisers or other third parties to place Cookies on our Website or on our App to provide personalised content and services. Please note that if Cookies are blocked, we cannot guarantee the functioning of such services.
- **Analytical Cookies for statistical purposes and measuring traffic:** these Cookies gather information about your use of our Website or of our App, the pages you visit and any errors that may occur during navigation. We also use these Cookies to recognise the place of origin for visits to our Website or our App. These Cookies do not gather information that may personally identify you. All information is collected in an anonymous manner and is used to improve the functioning of our Website or of our App through statistical information. Therefore, these Cookies do not contain personal data. In some cases, some of these Cookies are managed on our behalf by third parties, but may not be used by them for purposes other than those mentioned above.
- **Advertising and re-marketing Cookies:** these Cookies are used to gather information so that ads are more interesting to you, as well as to display other advertising campaigns along with advertisements on the Website or on the App as well as on those of third parties. Most of these Cookies are “third party cookies” which are not managed by us and, because of the way they work, cannot be accessed by us, nor are we responsible for their management or purpose.

Our Privacy Policy contains more information about the way third party cookies work, their purpose and how they are used. You may find this information in the list of Cookies available in Clause 9.5.

To that end, we can also use the services of a third party in order to collect data and/or publish ads when you visit our Website or our App. These companies often use anonymous and aggregated information (not including, for example, your name, address, email address or telephone number) regarding visits to this Website or to our App and others in order to publish ads about goods and services of interest to you.

- **Advertising or retargeting cookies shared with third parties:** these cookies, served on our Website through the audience technology platforms indicated in Clause 9.5, collect pseudonymized personal data, means information that cannot by itself be used to directly identify a particular person or entity, and enable other advertisers to show you ads on their websites or on third parties' websites about goods and services of interest to you. These advertisers operate in the following sectors: tourism, leisure, entertainment, high technology, fashion, decoration, consumer goods, food and beverage, finance, banking, insurance, energy, environment, communication, mass media, real estate, pharmaceuticals, clothing and textiles, education and training, energy, publications and publishing, information and communications technology, retail, sport, telecommunications and general services.

- **Social Cookies:** these Cookies allow you to share our Website and click "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 Paragraph 9.5.

## 9.5 List of Cookies used on this Website

To see the list of Cookies used on this Website, click [here](#).

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.

With regard to the Advertising or retargeting cookies indicated in Clause 9.4.3, here you can find the information on how our audience technology platforms process your personal data and their disabling systems:

- [Salesforce](#)
- [Eyeota](#)

## 9.6 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

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**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

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**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?**

To pursue our legitimate interest (i.e. improving our Website, its features and our products and services)

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**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 our Website, products and services and 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)

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**Why?**

E. To enable other advertisers to tailor and personalise online marketing notifications and advertising to be shown on their website or on third parties websites, based on the information on your use of our Website that we share with them.

**On which legal basis?**

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

**9.7 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 or App

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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 or App

## **9.8 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.

### **9.8.1 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.

### **9.8.2 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.

### **9.8.3 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. Privacy notice for Facebook**

### **10.1. Facebook Custom Audiences - Facebook pixel**

We use the remarketing function "Custom Audiences" of Facebook Inc. (1601 Willow Road, Menlo Park, California 94025) or, if you are based in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. This function allows us to show our Users and/or Customers of our website interest-based ads when they visit Facebook ("Facebook ads"), and to analyze such Facebook ads for statistical and market research purposes, which helps us optimize future advertising. This allows us to serve more relevant advertising.

For this purpose we use the so-called Facebook pixel for our website.

When a User or a Customer visits our website and takes an action (for example, buying something), the Facebook pixel is triggered and reports this action. This way, we will know when a customer took an action after seeing our Facebook ad. We will also be able to reach this customer again by using a Custom Audience. Therefore, this pixel allows user behavior to be tracked after they have been redirected to our Website by clicking on a Facebook ad. This way, we will know when a customer took an action after seeing our Facebook ad. We will also be able to reach this customer again by using a Custom Audience.

Therefore, this enables us to measure the effectiveness of Facebook ads for statistical and market research purposes. The data collected in this way is anonymous to us, i.e. we do not see the personal data of individual users. However, this data is stored and processed by Facebook, which is why we are informing you, based on our knowledge of the situation. Facebook may link this information to your Facebook account and also use it for its own promotional purposes, in accordance with Facebook's Data Usage Policy <https://www.facebook.com/about/privacy>. Such

data may allow Facebook and its partners to show ads on or off Facebook. A cookie may also be stored on your computer for these purposes.

## 10.2. Facebook SDK

Within our App, we use the Software Development Kit (SDK) from Facebook. The Facebook SDK is issued and administered by Facebook Inc, 1601 S. California Ave, Palo Alto, CA 94304, USA, or, if you are based in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. By means of this integration, we can link various Facebook services with our App (i.e. Facebook Analytics, Facebook Ads, Facebook Login via the SDK, Facebook Account Ki, Facebook Share, Facebook Graph API and Facebook App Events).

In particular, we have linked the following SDK Facebook services with our App:

**Facebook Login:** to provide you with the possibility to register or log in with your Facebook account

**Facebook App Events:** To understand people's actions in our app and measure the effectiveness of your Mobile App Ads. We use this service to evaluate the reach of our advertising campaigns and use of Facebook SDK. Facebook merely provides us with an aggregated analysis of user behavior within our app.

In addition, as our App is linked to SDK Facebook services, we have to follow Facebook policies, which include that we are obliged to share with Facebook, when you download the App, even when you are not logged in to the social media platform, the following data:

- Anonymous online identifier;
- Information confirming that you have download our App;
- Type of device you have used to download our App;
- Your device model name;
- Your geographical zone;
- Your time zone;
- Your connection provider;
- The size and density of your screen device;
- CPU cores of your device;
- The external storage size in GB of your device;
- The free space on external storage in GB of your device;
- Device timezone

By downloading our App you declare that you agree with the communication of the data to Facebook as described above.

Further information about Facebook SDK within iOS can be found here:<https://developers.facebook.com/docs/ios>. For Android, please refer to: <https://developers.facebook.com/docs/android>.

You can check and modify the status of your connection to Facebook and the respective access privileges of our Apps at any time under your Facebook profile settings (<https://www.facebook.com/settings?tab=applications>). If you want to cancel the connection between Facebook and our App, please log in to Facebook and make the necessary changes in your profile settings.

## 11. Update and old versions of this privacy policy

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on our Website and update the "Last Updated" date at the top of this Privacy Policy.

Old versions of this Privacy Policy are available [here](#).