

“Win a £500 Travel Voucher for your next holiday with lastminute.com to Morocco” PRIVACY POLICY

1. WHO IS THE CONTROLLER OF ENTRANTS' PERSONAL DATA?

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' personal data under this Privacy Policy (hereinafter, referred to as the **“Data Controller”** and/or **“lastminute.com”**). Furthermore, lastminute.com informs Entrants that, for compliance with the General Data Protection Regulation (EU) 2016/679 (**“GDPR”**) purposes only (Art. 27 GDPR), it 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.

lastminute.com, being an entity located in Switzerland, is subject to Swiss law regarding the protection of personal data. For that reason, lastminute.com undertakes to comply with the obligations imposed by the GDPR and the Swiss Federal Act on Data Protection of 19 June 1992 (FADP) too. In the same vein, lastminute.com informs Entrants 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.

2. WHAT CATEGORIES OF ENTRANTS' DATA DOES LASTMINUTE.COM COLLECT AND USE?

When Entrants join the Prize Draw, visit the website and use lastminute.com Comparison Service (Entrants as a "User") lastminute.com collects the categories of personal data as follows:

2.1 Personal data provided by Entrants

The personal data that Entrants share with lastminute.com, including the information included in Entrants' comments, reviews or messages during the Prize Draw.

The provision of Entrants' personal data, where requested, is necessary for participation in the Prize Draw to comply with lastminute.com legal obligations except when lastminute.com relies on consent as legitimate basis for processing and or lastminute.com legitimate interest. Without it, lastminute.com may not be able to provide Entrants with all the requested services.

It is important that all the personal data Entrants give lastminute.com is correct and accurate. This includes, by way of example only, ensuring that lastminute.com has got Entrants' correct contact (including email) details at all times.

3. WHY DOES LASTMINUTE.COM COLLECT ENTRANTS' DATA?

In general terms, lastminute.com uses Entrants' personal data to allow Entrants to join the Prize Draw. More specifically:

Why?	On which legal basis?
A. To create and maintain the contractual relationship established for the provision of the product and/or service requested (joining the Prize Draw) by Entrants in all its phases and by way of any possible integration and modification or to take steps at Entrants' request in relation to the contract prior to entering into contractual relationship.	To fulfil a contract, or take steps linked to a contract (i.e. to join the Prize Draw)

<p>D. To carry out aggregative statistical analyses on anonymised groups or to analyse identifiable individuals behaviour so that lastminute.com can see how lastminute.com website, products and services are being used and how lastminute.com business is performing.</p>	<p>To pursue lastminute.com legitimate interest (i.e. improving lastminute.com Website, its features and lastminute.com products and services)</p>
<p>F. To send Entrants personalised and profiled marketing communications</p> <p>Only with Entrants' previous consent, to share with them via email, and on lastminute.com website or third party ones (e.g. using ads and/or Web Push Notifications) the best deals and offers on products and services lastminute.com thinks Entrants might find interesting because they are suited to Entrants' interests. The individualised service or the offers can be marketed by lastminute.com or lastminute.com 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.</p> <p>For this purpose lastminute.com may:</p> <ul style="list-style-type: none"> - analyse Entrants' personal information to create a profile of their interests and preferences so that lastminute.com can tailor and target its communications in a way that is timely and relevant to Entrants. - combine the information Entrants give lastminute.com via cookies with information related to Entrants' purchases and information lastminute.com receive from third parties that collect Entrants' data through various means agreed by Entrants. Entrants can find information about third parties on this link. - analyse information about the way Entrants engage with communication material they receive from lastminute.com, such as data on when emails have been opened or to determine if Entrants have viewed or 	<p>IF APPLICABLE AND WHERE EXPLICITLY REQUESTED THROUGH A NON PRE-FLAGGED CHECKBOX</p> <p>Where Entrants give their consent (by ticking the appropriate check box)</p>

<p>interacted with an ad, to record the number of times Entrants have viewed each ad, to prevent a single ad being shown to Entrants too frequently etc.</p> <ul style="list-style-type: none"> - temporarily share an encrypted version of Entrants' 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 Entrants with lastminute.com offers cross device or cross channel, for example on social networks (Facebook, Instagram, Twitter). - use automated decision making to segment and target product offers based on Entrants' demands and needs. This allows lastminute.com to be more focused, efficient and cost effective with its resources and also reduces the risk of someone receiving information they may find inappropriate or irrelevant. Entrants can always request a manual decision- making process instead, express their opinion or contest decision based solely on automated processing, including profiling, if such a decision would produce legal effects or otherwise similarly significantly affect Entrants. For further details, Entrants may contact lastminute.com Data Protection Officers whose details are provided in this privacy policy. 	
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4. WHO SEES, RECEIVES AND USES ENTRANTS' DATA AND WHERE?

4.1 Categories of recipients of Entrants' data

lastminute.com shares Entrants' personal data, for the purposes described in this Privacy Policy, to the following categories of recipients:

- lastminute.com authorised employees and/or collaborators that assist and advise lastminute.com on Administration, Products, Legal Affairs, Customer Care Team, and information systems, as well as those in charge of maintaining lastminute.com network and hardware/software equipment;
- lastminute.com third-party service providers (including other entities of the lastminute.com group), which process Entrants' personal data on lastminute.com behalf and under lastminute.com instructions for the purposes described hereinabove acting as data processors, such as those providing lastminute.com with IT and hosting services call centre and customer support, analytics and administration services etc.
- lastminute.com authorized partner (Prize Provider)
- Competent authorities when lastminute.com is required to do so by the current law.

- Competent authorities and Law and enforcement third parties when this is necessary so that lastminute.com can enforce lastminute.com terms of use and protect and defend lastminute.com 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 lastminute.com business or its assets (in which case Entrants' details will be disclosed to lastminute.com advisers and any prospective purchaser's advisers and will be passed to the new owners).

The complete list of parties to which Entrants' personal data may be disclosed is available at lastminute.com registered office and may be requested by writing to privacy.en@lastminutegroup.com.

4.2 International transfer of Entrants' data

Entrants' personal data is processed in at the Data Controller's registered office, on the lastminute.com 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 lastminute.com are an international travel company, lastminute.com also transfer Entrants' 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:
 - lastminute.com discloses Entrants' data to autonomous data controllers such as airlines, hotels, car hire companies, tour operators etc. that might process Entrants' data outside the EEA in order to provide Entrants with the requested services.
 - lastminute.com discloses Entrants' data to lastminute.com service providers who act as data processors on lastminute.com behalf that might be located in a country outside the EEA, including the US, Morocco, Albania, UK, India and Tunisia. When such a transfer happens, lastminute.com ensures 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. lastminute.com providers, acting as a data processor, may be engaged in, among other things, the fulfilment of Entrants' service request, the processing of Entrants' payment details, the provision of advertising and marketing services on lastminute.com behalf and the provision of support services through electronic communications or call centre.

Should Entrants want to obtain further details about the safeguards put in place, Entrants can contact lastminute.com by writing to privacy.en@lastminutegroup.com.

5. HOW LONG DOES LASTMINUTE.COM RETAIN ENTRANTS' DATA?

lastminute.com retains Entrants' personal data for as long as is required to achieve the purposes and fulfil the activities as set out in this Privacy Policy (1 year from the date of participation in the Prize Draw), otherwise communicated to Entrants or for as long as is permitted by applicable law.

6. WHAT ARE ENTRANT'S DATA PROTECTION RIGHTS AND HOW CAN ENTRANTS EXERCISE THEM?

Entrants can exercise the rights provided by the Regulation EU 2016/679 (Articles 15-22), including the right to:

Name of the right	Content
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Right of access	To receive confirmation of the existence of Entrants' personal data, access its content and obtain a copy.
Right of rectification	To update, rectify and/or correct Entrants' personal data.
Right to erasure/right to be forgotten and right to restriction	To request the erasure of Entrants' data or restriction of Entrants' 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 lastminute.com has made Entrants' personal data public, Entrants have also the right to request the erasure of Entrants' personal data and to take reasonable steps, including technical measures, to inform other data controllers which are processing the personal data that Entrants have requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
Right to data portability	To receive a copy of Entrants' personal data Entrants provided tolastminute.com for a contract or with Entrants' consent in a structured, commonly used and machine-readable format (e.g. data relating to Entrants' participation) and to ask lastminute.com to transfer that personal data to another data controller.
Right to withdraw Entrants' consent	Wherever lastminute.com relies on Entrants' consent Entrants will always be able to withdraw that consent, although lastminute.com may have other legal grounds for processing Entrants' data for other purposes.
Right to object, at any time	Entrants have the right to object at any time to the processing of Entrants' personal data in some circumstances (in particular, where lastminute.com doesn't have to process the data to meet a contractual or other legal requirement or where lastminute.com is using Entrants' data for direct marketing

<p>Right not to be subject to a decision based solely on automated processing, including profiling</p>	<p>Entrants can always request a manual decision-making process instead, express Entrants' 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.</p>
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Entrants can exercise the above rights at any time by:

- Contacting lastminute.com via email at privacy.en@lastminutegroup.com.
- As for direct marketing, please note that Entrants can also object at any time by clicking the unsubscribe link which lastminute.com provides in each communication sent to you
- As for online targeted ads and the withdrawal of Entrants' consent please refer to lastminute.com Cookie section of this Privacy Policy.

In case Entrants exercise any of the above rights provided by GDPR, please note that lastminute.com will attend Entrants' 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.

Entrants' rights in relation to Entrants' personal data might be limited in some situations. For example, if fulfilling Entrants' request would reveal personal data about another person or if lastminute.com has a legal requirement or a compelling legitimate ground lastminute.com may continue to process Entrants' personal data which Entrants have asked lastminute.com to delete.

Entrants also may have the right to make a complaint if Entrants feel Entrants' personal information has been mishandled. lastminute.com encourages Entrants to come to lastminute.com in the first instance but, to the extent that this right applies to you, Entrants are entitled to complain directly to the relevant Data Protection Supervisory Authority.

7. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

lastminute.com Data Protection Officer (or "DPO") is available at:

dpo.en@lastminutegroup.com

Vicolo de' Calvi 2 - 6830

Chiasso SWITZERLAND

8. INFORMATION ABOUT COOKIES

8.1 What are cookies and other similar technologies ("Cookies")?

Cookies are small text files which are stored on Entrants' computer, hard drive, smartphone or tablet (hereinafter referred to as, "Device"). These Cookies hold a modest amount of data specific to Entrants and allows a server to deliver a page tailored to Entrants on their Device.

On lastminute.com Website, lastminute.com 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 that Entrants use to access lastminute.com Website.

Furthermore, by implementing the cookies and other similar technologies described above, if Entrants return to lastminute.com Website, this can read and recognise such technologies, which primarily are

used to operate or improve the way lastminute.com Website works as well as to provide business and marketing information to the Website owner.

8.2 Authorisation for the use of Cookies on lastminute.com Website or App

In accordance with the notice of Cookie usage appearing on lastminute.com Website's homepage (or before starting to use lastminute.com Apps) and lastminute.com Cookie Policy, Entrants agree that, if they click the "Accept" or "Allow" button of lastminute.com Cookie banner, they consent to the use of Cookies described herein, except to the extent that Entrants have set their preferences through the "review settings" area or they have modified their browser settings to disable their use.

8.3. What categories of Entrants' data does lastminute.com collect and use?

When Entrants visit lastminute.com Website and use lastminute.com Comparison Service or when Entrants access lastminute.com Apps (Entrants as a "User") lastminute.com collect the following categories of personal data:

Personal data collected automatically from lastminute.com Website and from third parties

- Information about Entrants' visits to and use of lastminute.com Website, such as information about the Device and browser Entrants are using, Entrants' IP address or domain names of the computers connected to lastminute.com 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 Entrants visited, the duration of Entrants' visit, the referral source and website navigation paths of Entrants' visit and Entrants' interactions on lastminute.com Website including the services and offers Entrants are interested in. Please note that Entrants may associate this information with Entrants' account.

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

8.4. Types of Cookies used on lastminute.com Website

8.4.1 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 Entrants' Device from a website or domain managed by lastminute.com and from which the service Entrants requested is provided.
- **Third party Cookies:** these are sent to Entrants' Device from a website or domain other than the one being visited by Entrants and that is not managed by lastminute.com, but by a separate entity that processes data obtained through Cookies.

8.4.2 Types of Cookies according to the length of time Entrants stay connected:

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

- **Session Cookies:** these are designed to receive and store data while Entrants access lastminute.com Website. These Cookies do not remain stored on Entrants' Device when they exit the browser session or the lastminute.com Website.

- **Persistent Cookies:** these types of Cookies remain stored on Entrants' Device and can be accessed and processed after Entrants exit the lastminute.com Website as well as when Entrants navigate on it for a predetermined period of time. The Cookie remains on the hard drive until it reaches its expiration date. The maximum time lastminute.com use persistent Cookies on lastminute.com Website is 1 year. At this point the browser would purge the Cookie from the hard drive.

8.4.3 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 lastminute.com Website or lastminute.com App and are essential for browsing and allow the use of various features. Without them, Entrants cannot use the search function, compare tool or book other available services on lastminute.com Website or on lastminute.com App.
- **Personalisation Cookies:** these are used to make navigating lastminute.com Website or lastminute.com App easier, as well as to remember Entrants' selections and offer more personalised services. In some cases, lastminute.com may allow advertisers or other third parties to place Cookies on lastminute.com Website or on lastminute.com App to provide personalised content and services. Please note that if Cookies are blocked, lastminute.com cannot guarantee the functioning of such services.
- **Analytical Cookies for statistical purposes and measuring traffic:** these Cookies gather information about Entrants' use of lastminute.com Website or of lastminute.com App, the pages Entrants visit and any errors that may occur during navigation. lastminute.com also use these Cookies to recognise the place of origin for visits to lastminute.com Website or lastminute.com App. These Cookies do not gather information that may personally identify Entrants. All information is collected in an anonymous manner and is used to improve the functioning of lastminute.com Website or of lastminute.com App through statistical information. Therefore, these Cookies do not contain personal data. In some cases, some of these Cookies are managed on lastminute.com behalf by third parties, but may not be used by them for purposes other than those mentioned above.
- **Advertising and remarketing Cookies:** these Cookies are used to gather information so that ads are more interesting to Entrants, as well as to display other advertising campaigns along with advertisements on lastminute.com Website or on lastminute.com App as well as on those of third parties. Most of these Cookies are "third party cookies" which are not managed by lastminute.com and, because of the way they work, cannot be accessed by lastminute.com, nor is lastminute.com responsible for their management or purpose. lastminute.com Privacy Policy contains more information about the way third party Cookies work, their purpose and how they are used. Entrants may find this information in the list of Cookies available in Clause 8.5. To that end, lastminute.com can also use the services of a third party in order to collect data and/or publish ads when Entrants visit lastminute.com Website or lastminute.com App. These companies often use anonymous and aggregated information (not including, for example, Entrants' name, address, email address or telephone number) regarding visits to lastminute.com Website or to lastminute.com App and others in order to publish ads about goods and services of interest to Entrants.
- **Advertising or retargeting Cookies shared with third parties:** these Cookies, served on lastminute.com Website through the audience technology platforms indicated in Clause 8.5,

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 Entrants ads on their websites or on third parties' websites about goods and services of interest to Entrants. 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 Entrants to share lastminute.com Website and click "Like" on social networks like Facebook, Twitter and YouTube, etc. They also allow Entrants 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 Entrants can find on the list below in Paragraph 8.5.

8.5 List of Cookies used on lastminute.com Website

To see the list of Cookies used on lastminute.com 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 lastminute.com Cookie Policy.

With regard to the Advertising or retargeting Cookies indicated in Clause 8.4.3, here Entrants can find the information on how lastminute.com audience technology platforms process Entrants' personal data and their disabling systems:

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

8.6 Why does lastminute.com collect Entrants' data?

Why?

A. To create and maintain the contractual relation established for the provision of the Service requested by Entrants 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 lastminute.com can see how lastminute.com Website, products and services are being used and how lastminute.com business is performing.

On which legal basis?

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

Why?

D. To tailor and personalise online marketing notifications and advertising for Entrants (i.e. Web Push Notifications) based on the information on Entrants' use of lastminute.com Website, products and services and other sites collected through Cookies.

On which legal basis?

Where Entrants give their consent (i.e. through the Cookie banner or by the settings of the Entrants' browser)

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 Entrants' use of lastminute.com Website that lastminute.com share with them.

On which legal basis?

Where Entrants give their consent (i.e. through the Cookie banner or by the settings of the Entrants' browser)

8.7 How long does lastminute.com retain Entrants' data?

lastminute.com retain Entrants' 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 Entrants 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 lastminute.com websites or App

Data collected via tag

Non-technical Cookies

Retention period

Max 1 year

Starting date

From the date of browsing on lastminute.com websites or App

8.8 Cookies management

Entrants must keep in mind that if their Device does not have Cookies enabled, Entrants' experience on the Website may be limited, thereby impeding the navigation and use of lastminute.com services.

8.8.1 How do Entrants disable/enable Cookies?

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

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

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

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

8.8.2 How are third party Cookies enabled/disabled?

lastminute.com do not install third party Cookies. They are installed by lastminute.com partners or other third parties when Entrants visit lastminute.com Website. Therefore, lastminute.com suggest that Entrants consult lastminute.com partners' Websites for more information on managing any third party Cookies that are installed. However, lastminute.com invite Entrants to visit the following website <http://www.youronlinechoices.com/> where Entrants can find useful information about the use of Cookies as well as the measures Entrants can take to protect their privacy on the internet.

8.8.3 How do Entrants disable Web Push Notifications?

Entrants can disable Web Push Notifications through their 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>