

INFORMATION REGARDING COOKIES

1. Introduction
2. Who is the controller of your data?
3. What are cookies and other similar technologies?
4. Authorization for the use of Cookies on our Website
5. What categories of your data do we collect and use?
6. Types of Cookies used on our Website
7. List of Cookies used on this Website
8. Why do we collect your data?
9. How long do we retain your data?
10. Cookies management
11. What are your data protection rights and how can you exercise them?
12. Contact details of the data controller
13. Contact details of our data protection officer (DPO)

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”), 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 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”).

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

3. What are cookies and other 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 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.

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" 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.

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") 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.

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, 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 remarketing 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 7 of our Cookie Policy.
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 7 of this Cookie Policy, 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 7 of our Cookie Policy.

7. 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 6.3, here you can find the information on how our audience technology platforms process your personal data and their disabling systems:

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

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?

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

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)

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. 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

Data collected via tag

Non-technical Cookies

Retention period

Max 1 year

Starting date

From the date of browsing on our websites or App

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.

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. 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 the right to:

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.

Name of the right

Right of rectification

Content

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

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.

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.

Name of the right

Right to withdraw your consent

Content

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes.

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, or where we are using your data for direct marketing).

You can exercise the above rights at any time by:

- Contacting us via email at 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 Article 10 of this Cookie Policy.

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.

12. 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 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.

13. 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.