Privacy Policy

Last update: **November 2025**

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 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 who visit and/or use the Website (you as a "User") .

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 personal data?

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

3. Why 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 (DPO)

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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.

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 lm 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”).

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

When you visit the Website (you as a "User") we collect the categories of personal data as follows:

2.1. Personal data provided by you

- The personal data that you share with us when you decide to contact us through the “Send us” button available on our Website.

The provision of the above personal data, where requested, is necessary for the adequate performance of the requested service 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, 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.

3. Why do we collect your data?

In general terms, we use your personal data to provide you with the services you request. More specifically:

- **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 or to take steps at your request in relation to the contract prior to entering into contract.**

On which legal basis? To fulfil a contract, or take steps linked to a contract
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- **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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- **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)

Where we rely on legitimate interest as a basis for processing your personal information, we carry out an assessment to ensure that our interest in the use of your data is legitimate and that your fundamental rights of privacy are not outweighed by our legitimate interests ('balancing test'). You can find out more information about the balancing test by contacting our Data Protection Officer at to dpo.en@lastminutegroup.com .

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, legal affairs, and information systems, as well as those in charge of maintaining our network and hardware/software equipment;
- Our third-party service providers (including other entities of the lastminute.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, analytics and administration services etc.
- 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.

4.2. International transfer of your data

Users' personal data is processed in at the Data Controller's registered office (see point 1), on the lastminute.com 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.

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;

Should you want to obtain further details about the safeguards put in place, you can contact us by writing to 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:

Document
Account information:
- Email
- Name and surname
- Country
- Organisation

Retention period
10 years

Starting date
From the date of the registration

DATA COLLECTED VIA TAG
Document
Technical cookies

Retention period
Max 3 years

Starting date
From the date of browsing on our websites

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 the right to:

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

Right of rectification - To update, rectify and/or correct your personal data.

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

Right to data portability - 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.

Right to withdraw your consent - 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.

Right to object, at any time - 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.

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

- 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 Bravonext SA ,

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 lm group, listed in the Ticino business register under no. CHE - 115.704.228 and with a 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
- Vicolo de' Calvi 2 - 6830 Chiasso, Switzerland.

9. Information about cookies

For any information about Cookies please read the following Cookie Policy.

10. 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.