

PRIVACY POLICY REGARDING THE PROCESSING OF PERSONAL DATA FOR A LASTMINUTE.COM DISCOUNT VOUCHER REQUEST

lastminute.com acknowledges the importance of protecting the privacy and rights of users (hereinafter, the “Users”) that use its Websites. Internet is potentially an extremely powerful tool for the circulation of personal data and the companies belonging to the lastminute.com group seriously undertake to comply with the rules on protecting personal data and security so as to ensure safe, controlled and confidential browsing.

Some amendments might be made to this privacy policy in the future so as to ensure constant compliance with the applicable legislation, in the event of any changes and updates thereto.

We invite Users to read carefully the rules which we apply for the collection and processing of personal data and for continuing to provide a satisfactory service.

This privacy information, provided pursuant to legislation on the protection of personal data, describes the procedures for managing and processing personal data of users for the request of a LASTMINUTE.COM discount voucher (hereinafter, the “Voucher”).

The data controller is BravoNext SA a Swiss company part of the lastminute.com group, whose registered offices are in Vicolo de' Calvi 2 - CH-6830 Chiasso - Switzerland (tel. +41 912 087 009) (hereinafter, the “Data Controller”). All personal data are provided voluntarily by the Users. The User is obliged to provide true, correct and updated personal data in order to create and manage the contractual relationship with the Data Controller.

The User acknowledges that if he/she does not provide true, correct and updated personal data, the Data Controller will not be able to provide its services.

The personal data of Users are collected:

- from the User through his/her own direct provision via internet when filling in the discount voucher request form found on the Website. It involves data including his/her name, surname, email address and phone number that are required in order to contact the User when finalising the discount voucher request.
- through ICT systems and software procedures used for the functioning of the Website during its normal operation, in an implicit manner, following the use of Internet communication protocols. This information is not collected to be associated with identified Users, but by its very nature could, through processing and association with data held by third parties, allow Users to be identified. This category of data includes IP addresses or domain names of computers used by Users who connect to the site, the URI (Uniform Resource Identifier) of requested resources, the time of request, the method used to submit the request to the server, the size of the file received in reply, the numerical code indicating the status of the reply given by the server (successful, error, etc.) and other parameters regarding the operating system and computer environment of the User. This data is used for the sole purpose of gaining anonymous statistical information on the use of the Website and to check that it operates correctly.

The data may be used for ascertaining liability in the event of alleged computer crimes that cause damage to the Website.

- from the Website through the use of cookies. Cookies are information files, often containing an anonymous, unique identification code, which are sent to the browser by a web server and are subsequently memorized on the hard disc of the User's computer. Cookies are then re-read and recognised by the Website which sent them, if subsequent connections to the Website are made.

Data that is obtained by cookies is used directly by the Data Controller or through companies which collaborate with it, in order to ensure a simpler, immediate and rapid access to the Website and use of the Service, more comfortable browsing on the website itself by the User.

The receipt of cookies used on this Website can be interrupted at any time by the User, by modifying his/her browser settings.

Users' personal data will be processed manually or electronically in such a way as to ensure, in relation to the purposes for which the data was sent and collected, their security and confidentiality, as well as to avoid unauthorised access to the same data, for the period of time strictly necessary to carry out the tasks for which the data was collected.

The data will be processed at the registered and operational offices of the Data Controller and on the lastminute.com group server farm located in Haarlem, The Netherlands, as well as at the premises of those parties to which the data may be sent.

The personal data supplied by Users are used for the following purposes:

A. deliver of the LASTMINUTE.COM discount voucher. The fulfilment of the aforesaid subsequent obligations may make it necessary to send the data to third-party companies, for example to airline companies, hotels and travel intermediaries.

B. fulfilment of legal obligations or those in accordance with current regulations;

C. collection, storage and processing of data to perform statistical analyses in an anonymous and/or aggregated form.

The failure to provide personal data may mean that the User is unable to obtain the required services in line with the purposes referred to under points A). The processing of such data for the purposes indicated under B) and C) do not require consent from the data subject.

The Data Controller undertakes to ensure that the personal data of which it gains knowledge will not be disseminated and will be processed with appropriate means in order to ensure their security and confidentiality, as well as to avoid unauthorised access to the data. The personal data and the information supplied by Users may be passed on, for the purposes referred to above, to the following categories of parties:

- employees and/or assistants who provide advice and assistance to the Data Controller for the Departments of Administration, Products, Legal Affairs, Customer Care Team, and ICT, as well as persons in charge of maintaining the company's IT network and the hardware and software in use;

- persons who are entitled to have access to the data through legal provisions or by orders issued by the Authorities;
- parties delegated and/or placed in charge by the Data Controllers to carry out the activities linked to the provision of the service.

The list of names of the parties to which the Users' personal data may be sent is available from BravoNext by writing to privacy@lastminutegroup.com.

Every User may exercise the following rights by making a written request to the Data Controller: (i) obtaining from the Data Controller confirmation of the existence of their personal data; (ii) having knowledge of the origin of the data, the processing purposes and procedures, as well as the logic applied if processed with the aid of electronic instruments; (iii) obtaining the identification details of the Data Controller and the Data Processors, if appointed. (iv) knowing the parties or categories of parties to whom the personal data may be communicated, or who may gain knowledge thereof in the capacity of appointed representative in the country in question, of data processors or persons in charge of processing. (v) obtaining the erasure, anonymization or blocking of data that has been processed unlawfully, as well as the update, rectification or, if there is an interest in this, the integration of such data, and (vi) obtaining a certification that the operations referred to in point (v) above have been brought to the knowledge, even as regards their content, of those to whom such data has been communicated or sent, unless this proves impossible or involves a manifestly disproportionate use of means when compared to the right being protected; (vii) objecting to the data processing, in whole or in part, on legitimate grounds; (viii) objecting to the data processing for the purpose of sending advertising materials, direct sales, or for the performance of market research or commercial communication activities. The requests referred to above must be sent to BravoNext SA, by writing to the address privacy@lastminutegroup.com.

The User also has the right, again by sending a written request by email, to obtain the rectification of every imprecise or inaccurate data or to obtain its erasure, within the limits of the legal provisions.