

Privacy Statement

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Bookabach Limited, a subsidiary of Expedia, Inc. (“we” or “us”) values you as our customer and recognizes that privacy is important to you. This Privacy Statement explains how we collect, use, and disclose data when you use our platform and associated services, your rights in determining what we do with the information that we collect or hold about you and tells you how to contact us.

Privacy Statement Summary

This is a summary of our Privacy Statement. To review our Privacy Statement in full, please click [here](#), or scroll down.

What does this [Privacy Statement](#) cover?

This Privacy Statement is designed to describe:

- How and what type of personal information we collect and use
- When and with whom we share your personal information
- What choices you can make about how we collect, use, and share your personal information
- How you can access and update your information.

[What personal information do we collect](#) and use, and how do we collect it?

We collect personal information when:

- You give us the information
- We collect it automatically
- We receive it from others

When you create an account on one of our sites, sign up to receive offers or information, or make a booking using our platform, you give us your personal information. We also collect such information through automated technology such as cookies placed on your browser, with your consent where applicable, when you visit our sites or download and use our Apps. We also receive information from affiliated companies within Expedia Group, as well as business partners and other third-parties, which help us improve our platform and associated tools and services, update and maintain accurate records, potentially detect and investigate fraud, and more effectively market our services.

[How is your personal information shared?](#)

Your personal information may be shared for several purposes, including: to help you book your travel and/or vacation, assist with your travel and/or vacation stay, communicate with you (including when we send information on products and services or enable you to communicate with travel providers and/or property owners), and comply with the law. The full Privacy Statement below details how personal information is shared below.

[What are your rights and choices?](#)

You can exercise your data protection rights in various ways. For example, you can opt out of marketing by clicking the “unsubscribe” link in the emails, in your account as applicable, or contacting our customer service. Our Privacy Statement has more information about the options and data protection [rights and choices](#) available to you.

[How to contact us](#)

More information about our privacy practices is in our full [Privacy Statement](#). You can also contact us as described below in the “[Contact Us](#)” section to ask questions about how we handle your personal information or make requests about your personal information.

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Categories of Personal Information We Collect

When you use our platform, Apps, or associated tools or services, we may collect the following kinds of personal information from you as needed:

- Name, username, email address, telephone number, and home, business, and billing addressees (including street and postal code)
- Government issued Identification required for booking or identity verification, such as passport, driver’s license, government redress numbers, and country of residence (for travel insurance purposes), and for vacation property owners, tax identification number
- Payment information such as payment card number, expiration date, billing address, and financial account number
- Travel-related preferences and requests such as favorite destination and accommodation

- types, and special dietary and accessibility needs, as available
- Loyalty program and membership information
 - Birth date and gender
 - Geolocation
 - Images (including facial photographs), videos, and other recordings
 - Social media account ID and other publicly available information
 - Communications with us (such as recordings of calls with customer service representatives for quality assurance and training purposes)
 - Searches you conduct, transactions, and other interactions with you on our online services and Apps
 - Other communications that occur through the platform among partners and travelers, and in-group chat and traveler-collaboration tools
 - The searches and transactions conducted through the platform
 - Data you give us about other people, such as your travel companions or others for whom you are making a booking
 - Information we receive about you from other Expedia Group companies and third parties such as our business and affiliate partners and authorized service providers which may include updated contact information, demographic information, interests, and purchase history, which we may add to your account or profile and use for market research and analysis

We collect sensitive personal information either with consent or in accordance with local law. This may include information which could reveal your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, and health or disability information.

When you install any of our apps or use our platform, we automatically collect the following types of information from your device (“Automatically Collected Information”):

- IP address
- Device type
- Unique device identification numbers
- Internet browser-type (such as Firefox, Safari, Chrome, and Internet Explorer)
- Internet Service Provider
- Operating System
- Mobile carrier
- How your device has interacted with our online services, including the pages accessed, links clicked, trips viewed, and features used, along with associated dates and times
- Details of any referring website or exit pages, as well as general geographic location (such as at the country or city-level)

Our [Cookie Statement](#) section further explains how we use cookies and similar tracking technology.

Mobile Apps

When you download and use any of our mobile apps, we collect certain technical information from your device to enable the app to work properly and as otherwise described in this Privacy Statement. That technical information includes:

- Device and telephone connectivity information such as your carrier, network type,

- network operator, subscriber identity module ("SIM") operator, and SIM country
- Operating system and version
- Device model
- Performance and data usage
- Usage data, such as dates and times the app accesses our servers, the features and links clicked in the app, searches, transactions, and the data and files downloaded to the app
- Device settings selected or enabled, such as Wi-Fi, Global Positioning System ("GPS"), and Bluetooth (which may be used for location services, subject to your permission as explained below)
- Mobile device settings
- Other technical information such as app name, type, and version as needed to provide you with services

Permissions for Location-Based Services:

Depending on your device's settings and permissions and your choice to participate in certain programs, we may collect the location of your device by using GPS signals, cell phone towers, Wi-Fi signals, Bluetooth or other technologies. We will collect this information, if you opt in through the app or other program (either during your initial login or later) to enable certain location-based services available within the app (for example, locating available lodging closest to you). To disable location capabilities of the app, you can log off or change your mobile device's settings.

Mobile App Analytics:

Depending on your device's settings and permissions and your choice to participate in certain programs, we may use technology to track where you chose to download our app and to measure advertising effectiveness. When we use this kind of technology, we will use privacy enhancing technologies such as de-identification, pseudonymization, encryption and improved notice where possible.

Use of Personal Information

We use your personal information for various purposes described below, which depend on the site you visit or the app you use.

Your Use of Online Sites, Apps, and Services:

- Book the requested travel or enable vacation property booking
- Provide services related to the booking and/or account
- Create, maintain, and update user accounts on our platform and authenticate you as a user
- Maintain your search and travel history, accommodation and travel preferences, and similar information about your use of Expedia Group's platform and services, and as otherwise described in this Privacy Statement
- Enable and facilitate acceptance and processing of payments, coupons, and other transactions
- Administer loyalty and rewards programs
- Collect and enable booking-related reviews
- Help you to use our services faster and easier through features like the ability to sign-in using your account within the online services and sites of some of the Expedia Group

companies

Communications and Marketing:

- Respond to your questions, requests for information, and process information choices
- Enable communication between you and the travel supplier like hotels and vacation property owners
- Contact you (such as by text message, email, phone calls, mail, push notifications, or messages on other communication platforms) to provide information like travel booking confirmations and updates, for marketing purposes, or for other purposes as described in this Privacy Statement
- Market our products and services
- Analyze information such as browsing and/or purchase history and use the result to optimize advertising in accordance with your interests and preferences
- Measure and analyze the effectiveness of our marketing and promotions
- Administer promotions like contests, sweepstakes, and similar giveaways

Other Business Purposes and Compliance

- Conduct surveys, market research, and data analytics
- Maintain, improve, research, and measure the effectiveness of our sites and apps, activities, tools, and services
- Monitor or record calls, chats, and other communications with our customer service team and other representatives, as well as platform communications between or among partners and travelers for quality control, training, dispute resolution, and as described in this Privacy Statement
- Create aggregated or otherwise anonymized or deidentified data, which we may use and disclose without restriction where permissible
- Promote security, verify identity of our customers, prevent and investigate fraud and unauthorized activities, defend against claims and other liabilities, and manage other risks
- Comply with applicable laws, protect our and our users' rights and interest, defend ourselves, and respond to law enforcement, other legal authorities, and requests that are part of a legal process
- Comply with applicable security and anti-terrorism, anti-bribery, customs and immigration, and other such due diligence laws and requirements
- Operate our business using lawful business purposes and as permitted by law

The Expedia company responsible for the Expedia site you are using (including to make your booking) will be the main company responsible for your Personal Information, known as the controller. Where you use multiple Expedia sites, then each controller of those sites may act together to give you access to services such as our combined loyalty program, single account access to all our sites (each as they become available where you are) and for other support functions and operations to manage and improve our services across the Expedia Group companies. These are called joint controllers. This will not affect any marketing preferences that you have made and not updated with any particular Expedia company.

Clickstream data

In certain instances, we may use clickstream data to render an illustration of your usage of our site. Clickstream data is the collection of a sequence of events that represent visitor actions on a

website. We may reconstruct your site journey modeled on the timing and location of your actions. This data is primarily used for customer service purposes, to verify the legitimacy of a claim, or to defend ourselves. This data may also be used for other internal purposes such as improving the user experience on our website and identifying website malfunctions.

Sensitive Personal Information

We will only use your sensitive personal information for the purposes for which it was collected.

Lawful bases for processing:

We will collect personal information from you only (i) where the personal information is necessary to perform a contract with you (e.g., manage your booking, process payments, or create an account at your request), (ii) where the processing is in our legitimate interests and not overridden by your rights (as explained below), or (iii) where we have your consent to do so (e.g., sending you marketing communications where consent is required). In some cases, we will have a legal obligation to collect personal information from you such as where it is necessary to use your transaction history to complete our financial and tax obligations under the law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Certain countries and regions allow us to process personal information on the basis of legitimate interests. If we collect and use your personal information in reliance on our legitimate interests (or the legitimate interests of any third-party), this interest will typically be to operate or improve our platform and communicate with you as necessary to provide our services to you, for security verification purposes when you contact us, to respond to your queries, undertaking marketing, or for the purposes of potentially detecting or preventing illegal activities.

We may use artificial intelligence, machine learning, and other automated decision-making to enhance your user experience and keep our site safe.

For example, we may use it in relation to:

- the sort order you see on our site,
- destinations, property or activity recommendations,
- flight price insights and alerts,
- the content you upload on our site (e.g., images of your properties) to ensure they meet our quality or formatting requirements, and to identify relevant amenities included in your listing,
- the reviews you share with us to ensure they do not contain identifiable personal information or to assess customer satisfaction,
- the prevention and detection of breach of our terms and conditions or other fraudulent activities to keep our site safe,
- our language and dialects within our virtual agents' experience.

Automated decisions may be made by putting your personal information into a system and the decision is calculated using automatic processes.

We will not engage in automated decision-making that involves a decision with legal or similarly

significant effects solely based on automated processing of personal information, unless you: (1) explicitly consented to the processing, (2) the processing is necessary for entering into a contract, or (3) when otherwise authorized by applicable law.

You may have rights in relation to automated decision making, including the ability to request a manual decision-making process instead or contest a decision based solely on automated processing. If you want to know more about your data protection rights, please see the [Your Rights and Choices](#) section below.

Sharing of Personal Information

We share your personal information as described below and in this Privacy Statement, and as permitted by applicable law.

- **Expedia Group Companies.** We share your personal information within the Expedia Group companies, listed at expediagroup.com. Expedia Group companies (either autonomously or as joint data controllers, where applicable) share access and use your personal information as described in this Privacy Statement.
- **Third-party service providers.** We share personal information with third-parties in connection with the delivery of services to you and the operation of our business (for example, to provide credit card processing, customer service, business analytics, and fraud prevention and compliance services, and to serve you with advertising tailored to your interests). These third-party service providers are required to protect personal information we share with them and may not use any directly identifying personal information other than to provide services we contracted them for. They are not allowed to use the personal information we share for purposes of their own direct marketing (unless you have separately consented with the third-party under the terms provided by the third-party).
- **Travel suppliers.** We share personal information with travel-related suppliers such as hotels, airlines, car-rental companies, insurance, vacation-rental property owners and managers, and where available, activity providers, rail, or cruise lines who fulfill your booking. Please note that travel suppliers may contact you to obtain additional information if and as required to facilitate your booking or to otherwise provide the travel or associated services.
- **Business partners and offers.** If we promote a program or offer a service or product in conjunction with a third-party business partner, we will share your information with that partner to assist in marketing or to provide the associated product or service. In most of those cases, the program or offer will include the name of the third-party business partner, either alone or with ours, or you will be redirected to the website of that business with notice. An example of such a business-partner relationship would be a third-party loyalty program for which you could earn points by completing a booking on our platform.
- **Targeted Advertising.** We may disclose your Automatically Collected Information to our third-party marketing partners for targeted advertising. This may be considered “sharing” data under California law. Subject to certain limitations, some US residents have the right to opt out of having their personal information shared for this purpose. For more information, see the [Your Rights and Choices](#) section below. You should note that by opting out of these types of disclosures, you may limit our ability to customize your experience with content that may be of interest to you or to provide you with a better

travel experience. View our [Cookie Statement](#) for more information on our use of tracking technology for the purposes of targeted advertising.

- **Other Third-Parties.** When you access certain features like Facebook’s “Like” button or a single sign-on that allows you to login with your social media credentials to our online services, you will share information with the third-party, like a social media company, such as the fact that you have visited or interacted with us. In the European Economic Area (EEA), Switzerland, and United Kingdom (UK) we will not load social media sharing or sign-on buttons on our website unless and until you accept our use of cookies and similar technologies. For more information, see our [Cookie Statement](#). The third-party provider may combine this information with other information they have about you. The personal information shared will be governed by the third-party provider’s privacy policy (including any personal information we may access via the third-party provider). The third-party providers should inform you about how you can modify your privacy settings on their site.
- **Legal rights and obligations.** We may disclose your personal information and associated records to enforce our policies; as necessary to satisfy our tax or other regulatory reporting requirements, including the remission of certain taxes in the course of processing payments; or where we are permitted (or believe in good faith that we are required) to do so by applicable law, such as in response to a subpoena or other legal request, in connection with actual or proposed litigation, or to protect and defend our property, people and other rights or interests.
- **Corporate transactions.** We may share your personal information in connection with a corporate transaction, such as a divestiture, merger, consolidation, assignments or asset sale, or in the unlikely event of bankruptcy. In the case of any acquisition, we will inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Statement.

Your Rights and Choices

You have certain rights and choices with respect to your personal information, as described below:

- If you have an account with us, you may change your communication preferences by either (1) logging in and updating the information in your account (not available for all Expedia Group companies) or (2) contacting us [here](#).
- You can control our use of certain cookies by following the guidance in our [Cookie Statement](#).
- You can access, amend, inquire about deletion of, or update the accuracy of your information at any time by either logging into your account or contacting us [here](#)
- If you no longer wish to receive marketing and promotional emails, you may unsubscribe by clicking the ‘unsubscribe’ link in the email. You can also log into your account to change communication settings (not available for all Expedia Group companies) or contacting us [here](#). Please note that if you choose to unsubscribe from or opt out of marketing emails, we may still send you important transactional and account-related messages from which you will not be able to unsubscribe
- For our mobile apps, you can view and manage notifications and preferences in the settings menus of the app and of your operating system
- If we are processing your personal information on the basis of consent, you may withdraw that consent at any time by contacting us. Withdrawing your consent will not affect the lawfulness of any processing that occurred before you withdrew consent and it

will not affect our processing of your personal information that is conducted in reliance on a legal basis other than consent

Certain countries and regions provide their residents with additional rights relating to personal information. These additional rights vary by country and region and may include the ability to:

- Request a copy of your personal information
- Request information about the purpose of the processing activities
- Delete your personal information
- Object to our use or disclosure of your personal information
- Restrict the processing of your personal information
- Opt-out of the sale of your personal information
- Port your personal information
- Request information about the logic involved in our automated decision-making used in our fraud prevention practices and the result of such decisions

For more information on what data subject rights may be available to you, please click [here](#).

For questions about privacy, your rights and choices, and in order for you, or (where applicable) your authorized agent to make a request to amend or update your information, or to inquire about deletion of your information, please contact us [here](#).

In addition to the above rights, you may have the right to complain to a data protection authority about our collection and use of your personal information. However, we encourage you to contact us first so we can do our best to resolve your concern. You may submit your request to us using the information in the [Contact Us](#) section.

We respond to all requests we receive from individuals wanting to exercise their personal data protection rights in accordance with applicable data protection laws. Should you have the right to appeal a decision to not take action on a request under applicable law, instructions on how to make that appeal will be included in our response to you.

International Data Transfer

The personal information we process may be accessed from, processed or transferred to countries other than the country in which you reside. Those countries may have data protection laws that are different from the laws of your country.

The servers for our platform are located in the United States, and the Expedia Group companies and third-party service providers operate in many countries around the world. When we collect your personal information, we may process it in any of those countries. Our employees may access your personal information from various countries around the world. The transferees of your personal data may also be located in countries other than the country in which you reside.

We have taken appropriate steps and put safeguards in place to help ensure that any access, processing and/or transfer of your personal information remains protected in accordance with this Privacy Statement and in compliance with applicable data protection law. Such measures provide your personal information with a standard of protection that is at least comparable to that under the equivalent local law in your country, no matter where your data is accessed from, processed and/or transferred to.

Such measures include the following:

- Adequacy decisions of the European Commission confirming an adequate level of data protection in respective non-EEA countries.
- Transferee countries' participation in the APEC-CBPR forum. Further detail on Expedia Group's participation in such forum may be found in the "APEC Cross Border Privacy Rules System Participation" section below.
- Ensuring that the third-party partners, vendors and service providers to whom data transfers are made have appropriate mechanisms in place to protect your personal information. For instance, our agreements signed with our third-party partners, vendors and service providers incorporate strict data transfer terms (including, where applicable, the European Commission's Standard Contractual Clauses issued by the European Commission and/or United Kingdom, for transfers from the EEA/UK), and require all contracting parties to protect the personal information they process in accordance with applicable data protection law. Our agreements with our third-party partners, vendors and service providers may also include, where applicable, their certification under the EU-U.S. and/or Swiss-U.S. Privacy Shield certification, or reliance on the service provider's Binding Corporate Rules, as defined by the European Commission.
- Intra-group agreements in place for our Group companies which incorporate strict data transfer terms (including, where applicable, Standard Contractual Clauses issued by the European Commission and/or United Kingdom, for transfers from the EEA/UK) and require all group companies to protect the personal information they process in accordance with applicable data protection law.
- Carrying out periodic risk assessments and implement various technological and organization measures to ensure compliance with relevant laws on data transfer.

Privacy Shield

Certain Expedia Group U.S. affiliates have certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks and that we adhere to the Privacy Shield Principles of Notice, Choice, accountability for Onward Transfers, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability for personal information from the EU, Switzerland, and the United Kingdom. Such Expedia Group U.S. affiliates will continue to adhere to the Privacy Shield frameworks and Principles even though the CJEU determined in July 2020 that the EU-U.S. Privacy Shield framework is no longer an adequate transfer mechanism for the transfer of EU personal information to the U.S. In addition, Expedia Group maintains intra-group Standard Contractual Clauses where applicable to cover the transfer of EU personal information to the U.S. Our certifications can be found [here](#). For more information about the Privacy Shield principles, please visit: www.privacyshield.gov. For more on our adherence to the Privacy Shield Frameworks, please see information posted [here](#).

APEC Cross Border Privacy Rules System Participation

Bookabach Limited's privacy practices, described in this Privacy Statement, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

Security

We want you to feel confident about using our platform and all associated tools and services, and we are committed to taking appropriate steps to protect the information we collect. While no company can guarantee absolute security, we do take reasonable steps to implement appropriate physical, technical, and organizational measures to protect the personal information that we collect and process.

Our cybersecurity team develops and deploys technical security controls and measures to ensure responsible data collection, storage, and sharing that is proportionate to the data's level of confidentiality or sensitivity. We take efforts to continuously implement and update security measures to protect your information from unauthorized access, loss, destruction, or alteration. We hold our data-handling partners to equally high standards.

Record Retention

We will retain your personal information in accordance with all applicable laws, for as long as it may be relevant to fulfill the purposes set forth in this Privacy Statement, unless a longer retention period is required or permitted by law. We will deidentify, aggregate, or otherwise anonymize your personal information if we intend to use it for analytical purposes or trend analysis over longer periods of time.

When we delete your personal information, we use industry standard methods to ensure that any recovery or retrieval of your information is impossible. We may keep residual copies of your personal information in backup systems to protect our systems from malicious loss. This data is inaccessible unless restored, and all unnecessary information will be deleted upon restoration.

The criteria we use to determine our retention periods include:

- The duration of our relationship with you, including any open accounts you may have with Expedia Group companies, or recent bookings or other transactions you have made on our platform
- Whether we have a legal obligation related to your personal information, such as laws requiring us to keep records of your transactions with us
- Whether there are any current and relevant legal obligations affecting how long we will keep your personal information, including contractual obligations, litigation holds, statutes of limitations, and regulatory investigations
- Whether your information is needed for secure backups of our systems

Contact Us

If you have any questions or concerns about our use of your personal information, or wish to inquire about our personal information handling practices, and exercise your rights to access, correct or inquire about deletion of personal information, please contact us via the Privacy Section on our Customer Services Portal [here](#), or you can email our customer service team at APACSAR@expediagroup.com. For a list of the Expedia Group companies, click [here](#).

For more information about the data controller(s) (and joint controllers, where applicable) and/or Representative for personal information we process, please click [here](#).

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at

<https://feedback-form.truste.com/watchdog/request>.

Updates to Statement

We may update this Statement in response to changing laws or technical or business developments. If we propose to make any material changes, we will notify you by means of a notice on this page. You can see when this Privacy Statement was last updated by checking the “last updated” date displayed at the top of this Statement.

To view our APEC CBPR certification, click [here](#).