

# Privacy Statement

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**Vrbo**, part of the Expedia Group, (“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 personal information 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 personal information.

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

We collect personal information when:

- You give us the personal 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 personal 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 personal 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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## **Privacy Statement**

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## **Collection and Use of Your Personal Information**

You will find in this section information about:

- the types of personal information that we collect and use,
- how we collect and use it,
- the purposes for which we collect and use it, and
- the lawful basis we rely on to collect and use it.

## **Lawful bases for processing:**

In the tables below, you will find the lawful basis we rely on to collect and use your personal information.

In summary, we will collect personal information from you only when one of the following lawful bases applies:

- **Consent:** this means that we will process your personal information where you have given your consent to do so (e.g., sending you marketing communications where consent is required).
- **Legal obligation:** this means that we will process your personal information where we 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.
- **Performance of a contract:** this means that we will process your personal information 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),
  - 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).
- **Legitimate interest:** this means that we will process your personal information where the processing is in our legitimate interests and not overridden by your rights (as explained below),
  - 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. While the concept of legitimate interest only exists in certain countries and regions, we balance our usage of your personal information against your rights globally.

## Categories of Personal Information We Collect and Use

We collect personal information for the following purposes:

- **Platform Usage and Booking Purposes** – including to:
  - Enable your booking, verify your identity, and for travel insurance purposes.
  - 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 brands.
- **Communications and Customer Service Purposes** – including to:
  - 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, emergency notifications, or for other purposes as described in this Privacy Statement.
- **Marketing Purposes** – including to:
  - Contact you (such as by text message, email, phone calls, mail, push notifications, or messages on other communication platforms) for marketing purposes.
  - Analyze information such as browsing and/or purchase history and use the result to optimize advertising and marketing 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.
  - Deliver targeted advertising and advertising based on your profile. Our Cookie Statement further explains how we use cookies and similar tracking technology.
- **Market Research, Analytics, and Training Purposes to improve our Services** – including to:
  - 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.
- **Security and Compliance Purposes** – including to:
  - 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.

We collect the following categories of personal information for the following purposes:

Personal Information Category	Purposes for collection	Sources of Personal Information	Lawful basis
Government issued identification data - including passport, driver’s license, government redress numbers, country of residence, tax identification number (for property owners)	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligation</li> <li>● Performance of a contract with you</li> </ul>
	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligation</li> <li>● Performance</li> </ul>

<p>Identification data - including name, username, email address, telephone number, as well as home, business, and billing addresses (including street and postal code)</p>	<p>and Customer Service Purposes</p> <ul style="list-style-type: none"> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance Purposes</li> </ul>	<p>Expedia Group companies</p> <ul style="list-style-type: none"> <li>● Automatically from your device</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<p>a contract with you (and any co-traveler)</p> <ul style="list-style-type: none"> <li>● Legitimate interest (of you or a co-traveler)</li> <li>● Consent (including consent of a parent/guardian for the use of child data)</li> </ul>
<p>Payment data - including payment card number, expiration date, billing address, financial / bank account number</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligations</li> <li>● Performance of a contract with you (and any co-traveler)</li> <li>● Consent</li> </ul>
<p>Travel related preferences - including favorite destination and accommodation types, special dietary and accessibility needs, as available</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● Automatically from your device</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest (of you or a co-traveler)</li> <li>● Consent</li> </ul>

<p>Loyalty data – including loyalty program membership, loyalty points balance, points earned and used, loyalty status</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● Automatically from your device</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest (of you or a co-traveler)</li> <li>● Performance a contract with you</li> <li>● Consent</li> </ul>
<p>Geolocation data – including inferred location from IP address, country selected to use our website, and exact, real-time location (with your consent)</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● Automatically from your device</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligation</li> <li>● Performance a contract with you (and any co-traveler)</li> <li>● Legitimate interest (of you or a co-traveler)</li> <li>● Consent</li> </ul>
<p>Images, videos and recordings – including facial photographs, images you upload, and</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● Automatically from your device</li> <li>● From third parties, such</li> </ul>	<ul style="list-style-type: none"> <li>● Performance a contract with you</li> <li>● Consent</li> </ul>

videos	<p>Training Purposes to improve our Services</p> <ul style="list-style-type: none"> <li>• Security and Compliance Purposes</li> </ul>	as our business and affiliate partners and authorized service providers	
Communications with us – including emails, chat transcripts and recordings of calls with customer service representatives	<ul style="list-style-type: none"> <li>• Platform Usage and Booking Purposes</li> <li>• Communication and Customer Service Purposes</li> <li>• Marketing Purposes</li> <li>• Market Research, Analytics, and Training Purposes to improve our Services</li> <li>• Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From other Expedia Group companies</li> <li>• Automatically from your device</li> <li>• From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligations arising from a contract with you (and any co-traveler)</li> <li>• Legitimate interest (of you or a co-traveler)</li> <li>• Consent (including consent of a parent/guardian for the use of child data)</li> </ul>
Site interaction data - including searches you conduct, transactions and other interactions with you on our platform, online services and apps	<ul style="list-style-type: none"> <li>• Platform Usage and Booking Purposes</li> <li>• Communication and Customer Service Purposes</li> <li>• Marketing Purposes</li> <li>• Market Research, Analytics, and Training Purposes to improve our Services</li> <li>• Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From other Expedia Group companies</li> <li>• Automatically from your device</li> <li>• From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligations</li> <li>• Legitimate interest</li> <li>• Consent</li> </ul>
Device data – including device	<ul style="list-style-type: none"> <li>• Platform Usage</li> </ul>		



<p>type, unique device identification numbers , operating system, mobile carrier, and 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</p>	<p>and Booking Purposes</p> <ul style="list-style-type: none"> <li>• Communication and Customer Service Purposes</li> <li>• Marketing Purposes</li> <li>• Market Research, Analytics, and Training Purposes to improve our Services</li> <li>• Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>• From other Expedia Group companies</li> <li>• Automatically from your device</li> <li>• From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Legal obligation</li> <li>• Legitimate interest</li> <li>• Consent</li> </ul>
<p>Friends and co-traveler data - including data you give us about other people, such as your travel companions or others for whom you are making a booking</p>	<ul style="list-style-type: none"> <li>• Platform Usage and Booking Purposes</li> <li>• Communication and Customer Service Purposes</li> <li>• Marketing Purposes</li> <li>• Market Research, Analytics, and Training Purposes to improve our Services</li> <li>• Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From other Expedia Group companies</li> <li>• From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you (and any co-traveler)</li> <li>• Legitimate interest (of you or a co-traveler)</li> <li>• Consent</li> </ul>
<p>Child data - including name and contact details of minor travelers provided by you as the</p>	<ul style="list-style-type: none"> <li>• Platform Usage and Booking Purposes</li> <li>• Communication and Customer Service Purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From other Expedia Group companies</li> <li>• Automatically from your device</li> <li>• From third parties, such</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you (and any co-traveler)</li> <li>• Consent (including consent of a</li> </ul>

<p>parent/guardian of the minor as part of a trip reservation</p>	<ul style="list-style-type: none"> <li>● Security and Compliance Purposes</li> </ul>	<p>as our business and affiliate partners and authorized service providers</p>	<p>parent/guardian for the use of child data)</p>
<p>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.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● From other Expedia Group companies</li> <li>● Automatically from your device</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legitimate interest</li> <li>● Consent</li> </ul>
<p>Birthdate and gender - including both your specific date of birth or an approximate age bracket you fall within, along with your gender.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> <li>● From third parties, such as our business and affiliate partners and authorized service providers</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligation</li> <li>● Performance of a contract with you (and any co-traveler)</li> <li>● Legitimate interest (of you or a co-traveler)</li> <li>● Consent</li> </ul>

<p>Sensitive data – data that could reveal sensitive information, including your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, or health or disability information.</p> <p>We will only use your sensitive personal information for the purposes for which it was collected.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communication and Customer Service Purposes</li> <li>● Security and Compliance Purposes</li> </ul>	<ul style="list-style-type: none"> <li>● Directly from you</li> <li>● From other Expedia Group companies</li> </ul>	<ul style="list-style-type: none"> <li>● Legal obligations</li> <li>● Consent</li> </ul>
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## Sharing of Personal Information

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

Recipient of Personal Information	Purpose Category
<p><b>Expedia Group Companies.</b> We share your personal information within the Expedia Group companies, listed at <a href="https://www.expediagroup.com">expediagroup.com</a>. 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.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communications and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance purposes</li> </ul>

<p><b>Third-party service providers.</b> We share personal information with third-parties in connection with the delivery of services to you and the operation of our business.</p> <p>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).</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communications and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> <li>● Security and Compliance purposes</li> </ul>
<p><b>Travel suppliers.</b> 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 personal information if and as required to facilitate your booking or to otherwise provide the travel or associated services.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communications and Customer Service Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> </ul>
<p><b>Business partners and offers.</b> If we promote a program or offer a service or product in conjunction with a third-party business partner, we will share your personal 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.</p>	<ul style="list-style-type: none"> <li>● Platform Usage and Booking Purposes</li> <li>● Communications and Customer Service Purposes</li> <li>● Marketing Purposes</li> <li>● Market Research, Analytics, and Training Purposes to improve our Services</li> </ul>

**Targeted Advertising partners.** We may disclose your personal 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.

- Marketing Purposes
- Market Research, Analytics, and Training Purposes to improve our Services

**Social media and online platforms:** we share personal information with media agencies, social media, search engines and other online platforms to help us target our online marketing. These social media and other online platforms may also use personal information they hold and combine or match it against personal information received from us to create target audiences, which are audiences that we think would be interested in our online advertising. This may involve social media and other online platforms building a ‘lookalike’ profile of the type of person we are trying to target and providing specific adverts to those people when they browse the internet or use social media.

- Marketing Purposes
- Market Research, Analytics, and Training Purposes to improve our Services

**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.

- Marketing Purposes
- Market Research, Analytics, and Training Purposes to improve our Services

<p><b>Recipients in relation to our legal rights and obligations.</b> 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.</p>	<ul style="list-style-type: none"> <li>• Security and Compliance purposes</li> </ul>
<p><b>Recipients in relations to corporate transactions.</b> 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.</p>	<ul style="list-style-type: none"> <li>• Security and Compliance purposes</li> </ul>

## Joint Use of your Personal Information

We jointly use, and our Expedia Group companies are joint controllers of your personal information in the following manner:

- We process all the categories of personal information identified in the “Categories of Personal Information We Collect and Use” section jointly for the uses identified in the table above.
- The Expedia Group companies listed at <https://expediagroup.com/travel-with-us/default.aspx> process this personal information jointly.
- Expedia, Inc. is the party responsible for managing your personal information. More information about how to contact us regarding this joint use can be found in the “[Contact Us](#)” section.

## Our Use of Artificial Intelligence

We use artificial intelligence and machine learning for various purposes to deliver our platform and associated services. We may use your personal information for the following purposes:

- To enhance your user experience and keep our site safe.
- To determine the sort order you see on our site.
- To provide destinations, property or activity recommendations.
- To provide flight price insights and alerts.
- To screen 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.

- To screen the reviews you share with us to ensure they do not contain identifiable personal information or to assess customer satisfaction,
- To prevent and detect a breach of our terms and conditions or other fraudulent activities to keep our site safe,
- To display your 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 rely on our legitimate interest to keep our site safe and to enhance your user experience. 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 explicitly consented to the processing,
- the processing is necessary for entering into a contract, or for its performance
- 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](https://expediagroup.com/travel-with-us/default.aspx) section below. <https://expediagroup.com/travel-with-us/default.aspx>

## **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 personal 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 , the result of such decisions,
- Object to the use of fully automated decision making, including profiling, with significant legal effect, and request a manual decision-making process instead,
- Contest a decision based solely on automated processing.

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 personal 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. Such cross-border transfer of your personal information is necessary for us to service your transaction with us, and for the purposes outlined in this Privacy Statement.

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 information 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. We will comply with obligations regarding personal information cross-border transfer in accordance with applicable data protection laws, regulations, and conditions set by the competent authorities. This may include fulfilling obligations such as security assessments and/or certifications and signing agreements with overseas recipients in accordance with the standard contract established by the competent authorities.

Some measures that we have in place include the following:

- Adequacy decisions of the European Commission confirming an adequate level of data protection in respective non-EEA countries. Please see the latest list of such countries published by the European Commission [here](#).
- Transferee countries' participation in the APEC-CBPR forum. Please see the latest list of participant countries [here](#). Expedia Group holds the APEC-CBPR certification, and we have accordingly established measures across all Expedia Group companies to ensure that data is shared only in accordance with the CBPR requirements. 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. DPF and the UK extension to EU-U.S. DPF and/or Swiss-U.S. DPF certification (and any other country specific extension to the DPF adopted from time to time), or reliance on the service provider's Binding Corporate Rules, as defined by the European Commission. In regard to the onward principle of the DPF Frameworks, if Expedia, Inc. learns that a third party is using or disclosing your Personal Information in a manner that is contrary to this Policy, we will take reasonable steps to prevent or stop such use or disclosure. Expedia, Inc. may be liable for onward transfers of Personal Information to third parties in violation of this Policy and the DPF Frameworks (will change defined term if needed based on feedback above).

- 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.

## **Data Privacy Framework**

All wholly owned U.S. affiliates of Expedia, Inc. (part of the [Expedia Group of brands](#)) have certified to the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF and Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) (“the DPF Frameworks”) and that we adhere to the DPF Framework 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. The Federal Trade Commission has jurisdiction over such Expedia Group U.S. affiliates’ compliance with the DPF Frameworks. 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 DPF Frameworks principles, please visit: <https://www.dataprivacyframework.gov>.

In compliance with the DPF Frameworks, Expedia, Inc. U.S. affiliates (part of the [Expedia Group of brands](#)) commit to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner’s Office (ICO), the Gibraltar Regulatory Authority (GRA) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints

concerning our handling of personal data received in reliance on the DPF Frameworks. Under certain circumstances, you may have the possibility to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Please visit this link for more information: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>.

Expedia, Inc. commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the DPF Frameworks should first contact us via our [Contact Us](#) below.

## **APEC Cross Border Privacy Rules System Participation**

The privacy practices of Vrbo, 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 personal information collection, storage, and sharing that is proportionate to the personal information's level of confidentiality or sensitivity. We take efforts to continuously implement and update security measures to protect your personal information from unauthorized access, loss, destruction, or alteration. We hold our data-handling partners to equally high standards.

We have established an information security protection system based on industry best practices and have obtained PCI-DSS certification. We have also implemented appropriate security measures throughout the entire lifecycle of data collection, storage, processing, use, transmission, and sharing, and have taken certain technical and management measures including but not limited to verification and access controls, VPN, SSL encrypted transmission, and multi factor authentication mechanisms, based on our information classification and processing standards, to ensure the security of systems and services.

We have management and approval mechanisms for employees who may have access to your information and provide regular information security training for employees.

In the event of a personal data security incident that may affect your rights and interests, you will be notified in accordance with applicable data protection laws and regulations. We will also report the relevant incident to the competent regulatory authorities, if required by applicable laws and regulations.

## **Minors**

Our website and mobile application are not directed at minors (as defined in applicable data protection laws) and we cannot distinguish the age of persons who access and use these. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact us (see "[Contact Us](#)" section below). If we become aware that personal information has been collected from a minor without parental or guardian consent, we will terminate the minor's account, where that minor has an account with us.

The limited circumstances we might need to collect the personal information of minors include: as part of a reservation, the purchase of other travel-related services, or in other exceptional circumstances (such as features addressed to families). When processing personal information of minors, we strictly adhere to the principles of legality, necessity, clear purpose, openness, transparency, and security, and we take strict measures to protect such data.

If you have any questions or concerns regarding our protection of minors' personal information, or if you (in your capacity as the parent or guardian of the minor) wish to delete or correct the personal information of minors, please click [here](#).

## **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 personal information is inaccessible unless restored, and all unnecessary personal 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 personal 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 [here](#) or you can email our customer service team at APACSAR@expediagroup.com. For a list of the Expedia Group companies, click [here](#).

Your principal data controller is the Expedia Group company responsible for the site or app with which you are interacting, and this data controller may be acting as a joint controller with other members of the Expedia Group of companies. For more information about the data controller(s) (and joint controllers, where applicable) and/or Representative for personal information we process, please click [here](#).

## 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.

For information on prior updates please [contact us](#).