

BOOKING HOLDINGS

Booking Holdings Inc.'s Consumer Profiling Report for Booking.com

PUBLIC SUMMARY
NOVEMBER 2026

Introduction

On 13 May 2024, the European Commission designated Booking Holdings Inc. ("BHI") as a gatekeeper pursuant to Art. 3 of the DMA and designated Booking.com, including Rentalcars.com (as operated by Booking.com Transport Limited), as a Core Platform Service ("Booking.com").

Art. 15 of the DMA requires BHI as a gatekeeper to submit to the European Commission an independently audited description of any techniques for profiling of consumers that BHI applies to Booking.com, and to make publicly available an overview of the audited description. This document contains the public, non-confidential overview of the audited description, based on the profiling techniques utilised by Booking.com in the European Union as at 14 September 2026. This document is updated annually insofar as required under the DMA.

We are committed to protecting and safeguarding consumers' personal data and being transparent about the processing of personal data for consumer profiling. Further information about how we use and process data is also publicly available at the following sites: Booking.com's Privacy Notice for Travellers and Rentalcars.com's Privacy Notice for Travellers[1].

Why does Booking.com collect and use personal data for profiling purposes?

Booking.com conducts consumer profiling for the following purposes: (1) safety, security and fraud prevention; (2) trip and payments management; (3) personalisation, ranking and platform optimisation; (4) advertising, marketing and promotions; (5) analytics, insights and research; and (6) customer support and dispute resolution.

The legal bases set out in Art. 6(1) of the GDPR relied upon to process personal data for the purposes listed above are set out in the relevant portion of the Privacy Notice for Travellers. In view of the purposes listed above, Booking.com relies on legitimate interests, on necessity of the processing of personal data for the performance of a contract, on compliance with a legal obligation, and, where required under applicable law, on the consumer's consent, as further detailed in the Privacy Notice for Travellers.

What personal data does Booking.com collect for profiling purposes?

Booking.com processes personal data in the following data categories for profiling applied within Booking.com:

a. **Direct identifying information**: for example, information that directly identifies a consumer such as the consumer's first and last name and email address.

b. **System usage records:** for example, information about a consumer's use of the platform such as pages viewed during a session or search criteria used.

c. **Reservation details:** for example, logistical information about a consumer's trip, such as start and end dates, information about the number of accompanying guests and number of rooms.

d. **Service support information:** for example, information contained in correspondence via email, online form or chat between consumers and Booking.com, and between consumers and trip providers.

e. **Financial transactional information:** for example, information about a consumer's financial transactions such as credit card or bank account details, refunds, discounts or awards.

f. **Loyalty information:** for example, information about a consumer's activities relating to the Genius promotional traveller facing loyalty programmes.

g. **Geo-location data:** for example, information about the approximate geographic location indicated by the consumer's IP address, or precise location when location tracking is enabled.

What personal data does Booking.com infer for profiling purposes?

Booking.com infers data in the following data categories for profiling applied within Booking.com:

a. **Consumer preferences:** Information relating to the consumer's activity on Booking.com is used to infer a consumer's preferences and the recommendations, services, discounts or promotions a consumer may find relevant.

b. **Consumer future loyalty behaviour:** Information relating to the consumer is used to infer a consumer's potential for future loyalty to Booking.com's products and services.

c. **Likelihood of fraudulent or harmful activity:** information relating to the consumer is used to infer the likelihood or probability that the specific consumer or the relevant transaction is likely to be fraudulent or harmful.

What retention duration does Booking.com put in place?

Booking.com retains a consumer profile for up to ten years from the date of last account activity, or, where the consumer makes a reservation without an account, for up to 10 years from the end date of the trip (e.g. the check-out date) of the last reservation on the platform. The consumer profile may be retained for longer than the foregoing retention durations, for example, to allow Booking.com to comply with a legal obligation.

How does Booking.com seek consumer consent where required under applicable law?

Booking.com requests consent from the consumer to place non-functional cookies (analytical and marketing cookies) on the consumer's terminal equipment (e.g., the computer or mobile device). During a given session, upon initially accessing the Booking.com website, mobile app and the Rentalcars.com website, or when consumers perform a search action on the Rentalcars.com app, consumers are asked to accept or decline non-functional cookies via a cookie banner. Consumers are informed of their choices and the consequences of their choices within the cookie banner.

Why does Booking.com use profiling techniques?

Booking.com uses profiling techniques:

a. For the purpose of "safety, security and fraud prevention", Booking.com uses profiling applications, by way of example, to manage fraud prevention and detection.

b. For the purpose of "trip and payments management", Booking.com uses profiling applications, by way of example, to enable consumers to engage with the various services offered on the platform, such as searching, booking and cancelling reservations.

c. For the purpose of "personalisation, ranking and platform optimisation", Booking.com uses profiling applications, by way of example, to provide consumers the products and services Booking.com believes consumers want, such as by presenting the properties Booking.com thinks consumers will prefer and displaying popular destinations.

d. For the purpose of "advertising, marketing and promotions", Booking.com uses profiling applications, by way of example, to attract and retain consumers by using direct marketing, promotional campaigns and promotional traveller facing loyalty programmes.

e. For the purpose of "analytics, insights and research" Booking.com uses profiling applications, by way of example, to analyse usage patterns and to measure platform and organisational performance.

f. For the purpose of "customer support and dispute resolution" Booking.com uses profiling applications, by way of example, to provide assistance to consumers and to handle complaints and inquiries.

Does Booking.com make automated decisions?

Booking.com does not consider its profiling techniques to use automated decision-making within the meaning of Art. 22 of the GDPR.

What alternatives to profiling has Booking.com considered and what was the reason for not choosing them?

Booking.com considered alternative measures to profiling for the purposes listed above, such as:

a. For the purpose "safety, security and fraud prevention" – Booking.com considered, by way of example, manually processing data as an alternative to profiling. Booking.com did not choose this alternative because conducting these activities manually is not sustainable due to the high volume of data and the sophistication of threats.

b. For the purpose "trip and payments management" – Booking.com considered, by way of example, manually processing trip and payment matters. Booking.com did not choose this alternative because of the high volume of trips and transactions.

c. For the purpose "personalisation, ranking and platform optimisation" – Booking.com considered, by way of example, full anonymisation at source as an alternative to profiling. Booking.com did not choose this alternative because it prevents the "linkability" required to provide the service and its continuity and impedes Booking.com's business objective of providing personalised experiences.

d. For the purpose "advertising, marketing and promotions" – Booking.com considered, by way of example, static rule-based logic as an alternative to profiling. Booking.com did not choose this alternative because static rules may not be capable of incorporating nuanced human preferences and Booking.com believes that a "one-size-fits-all" approach would not satisfy consumers' expectations of Booking.com's products and services.

e. For the purpose "analytics, insights and research" – Booking.com considered, by way of example, analysing data only in large cohorts as an alternative to profiling. Booking.com did not choose this alternative because aggregation hides critical outliers or specific technical errors that impact only a subset of individuals.

f. For the purpose "customer support and dispute resolution" – Booking.com considered, by way of example, manually managing refunds and payouts to consumers as an alternative to profiling. Booking.com did not choose this alternative due to the high volume of transactions.



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