



BOOKING HOLDINGS

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

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Introduction

On 13 May 2024, the European Commission designated Booking Holdings Inc. ("BHI") as a gatekeeper pursuant to Art. 3 of the DMA¹ 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 15 September 2025. 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: Privacy Statement and Cookie Statement².

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

Booking.com conducts consumer profiling in order to: (1) operate a safe and trusted service; (2) enable bookings by consumers; (3) research markets, products, services, processes & preferences; and (4) promote Booking.com's products and services. These purposes may include personalising the consumer experience on the platform in a way that Booking.com believes will be relevant to consumers.

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 & Cookie Statement. 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 & Cookie Statement.

¹ Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act).

² Booking.com's Privacy and Cookie Statement can be found at: <https://www.booking.com/content/privacy-en-gb.html#cookie-statement>; and Rentalcars.com's Cookie Statement can be found at: <https://www.rentalcars.com/en/cookie-statement>.

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 loyalty program.
- 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 behavior:** 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. The consumer may change the consumer's cookie settings or the cookies placed on their device (including withdrawing consent for the placement of analytical and marketing cookies).

Why does Booking.com use profiling techniques?

Booking.com uses profiling techniques to support Booking.com's commercial, business and social objectives, which include:

- a. For the purpose of "operating a safe and trusted service", Booking.com uses profiling applications, by way of example, to manage fraud prevention and detection and to enhance content moderation for user generated content.
- b. The "enable bookings by consumers" purpose is part of Booking.com's commercial efforts to engage consumers with the various services offered on the platform. An example of a profiling application used for this purpose is the trip planner functionality.
- c. The "research markets, products, services, processes & preferences" purpose is part of Booking.com's objective to provide consumers the products and services Booking.com believes consumers want. By way of example, profiling applications utilised for this purpose present the properties Booking.com believes consumers will prefer as well as display popular destinations.
- d. The "promoting Booking.com's products and services" purpose is part of the platform's commercial efforts to attract and retain consumers. Profiling applications used for this purpose include, by way of example, promoting complementary services within one trip.

Does Booking.com make automated decision-making?

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 "operate a safe and trusted service" – Booking.com considered, by way of example, the alternative to manually process fraud detection. 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. In addition, manual verification may not meet industry standard requirements of technological implementations for security and authentication.
- b. For the purpose "enable bookings by consumers" – Booking.com considered by way of example, the alternative to manually manage refunds and payouts to consumers. This alternative is technically possible. However, Booking.com chose not to do so. Due to the high volume of such transactions, Booking.com determined manually managing these would be inefficient and excessively burdensome on customer service agents.
- c. For the purpose "research markets, products, services, processes and preferences" – Booking.com considered by way of example, using manual approaches. Booking.com did not choose these alternatives because they will likely lead to inaccurate models and reduce Booking.com's business objective to provide personalised experiences.
- d. For the purpose "promote our products and services" – Booking.com considered by way of example the alternative to provide generic recommendations and advertising instead of personalised recommendations and targeted advertising. Booking.com did not choose these alternatives because the ability to reach relevant consumers would likely be less effective than targeted recommendations and relevant advertising. Booking.com believes that generic recommendations would not satisfy consumers' expectations of Booking.com's products and services.



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