

# Booking.com

## Binding Corporate Rules Summary

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### About this document

We are Booking.com and this document provides a summary of our Binding Corporate Rules.

Our Binding Corporate Rules (BCRs) are data protection policies we adhere to across all Booking.com group entities to support our commitment to protect and safeguard personal data throughout Booking.com globally.

As a multinational company we operate through offices all over the world. Whilst data protection laws vary from country to country, we want to ensure we provide the same level of protection of personal data across all our offices globally. To support this, all our entities have signed up to follow a binding set of data protection rules – our BCRs – so you can be confident that your data remains well protected wherever it is transferred within our organisation.

To learn more about how we collect, process and protect personal data, please see our privacy notice.

If you have any questions about our BCRs or how we protect your personal data in general, you can always contact us by emailing [dataprotectionoffice@booking.com](mailto:dataprotectionoffice@booking.com).

### Definitions

The terms used in this document have the following meaning.

Term	Meaning
Booking.com	When we refer to “we”, “us” or “our”, we mean Booking.com group entities subject to our BCRs as described in the section <a href="#">List of entities</a> .
Binding Corporate Rules (BCRs)	Our BCRs are personal data protection policies which we adhere to to protect and safeguard personal data, especially with regard to transfers of personal data from a Booking.com group entity in the EEA to another Booking.com group entity in a country that is outside the EEA and not considered adequate for data protection purposes by the European Commission (EC).
EEA	The European Economic Area (EEA), consisting of the 27 European Union (EU) countries as well as Iceland, Liechtenstein and Norway.
Candidate	Anyone, other than an existing employee, applying to work for us.
Employee	Anyone working for Booking.com group entities, including, for the purposes of this document, independent contractors.
Sensitive personal data	Special categories of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health or data concerning a person's sex life or sexual orientation, and criminal convictions and offences.
Traveller	Anyone who uses, or is considering using, any of our travel products and services, whether for themselves or for others, through our platform.
Trip provider	The third-party who provides: an accommodation (a hotel, motel, apartment, bed & breakfast or other lodging, for example), an attraction (a theme park, museum or sightseeing tour, for example), transportation (for example by air or through ground transportation including private transport, public transport, car rental, railways or coach tour and related transfers) and any other travel or related product (such as insurance) or service(s) as from time to time are available on the platform for a trip reservation.

## Scope

Our BCRs apply to all Booking.com group entities globally when we process personal data of travellers, trip providers, employees, candidates or other individuals (such as office visitors or employee family members).

We have two BCR policies:

- a controller policy, applicable where an entity processes personal data for its own purposes; and
- a processor policy, applicable where an entity processes information on behalf of another party.

These policies apply to our entities according to their roles in the processing of personal data:

- Booking.com B.V. is typically the controller of all personal data of travellers and trip providers.
- Booking.com International B.V. is typically the controller of all personal data of candidates.
- Each Booking.com group entity is typically the controller for the processing of personal data of its employees, except for processing in the context of our global HR processes (when Booking.com International B.V. is typically the controller) or our global systems (when Booking.com B.V. is typically the controller).

Our processing and transfer of personal data under our BCRs can be summarised as follows:

### Travellers and trip providers

We process traveller and trip provider personal data (e.g. contact information, account information, payment information) to provide and support the agreed upon services, such as managing the reservation process, providing support to travellers and trip providers and offering additional travel-related services.

In particular, we use such data to:

- administer and maintain reservations (for example, at hotels) and online accounts on Booking.com's websites and mobile apps;
- provide and manage customer support, communications services and marketing;
- detect and prevent fraud and other illegal or unwanted activities, such as personal data breaches;
- improve Booking.com's products and services;
- comply with applicable laws; and
- manage legal disputes, for regulatory investigation, and for compliance and audits.

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For more information on the categories of traveller and trip provider personal data as well as the types and purposes of processing that personal data, please see our privacy notices available on [www.booking.com](https://www.booking.com) and other websites we operate as appropriate.

### Employees

We process employee data (e.g. contact information, emergency contacts, financial information) for management, administration, human resources and payroll purposes and to comply with applicable laws. In addition, we may need to process and transfer employee data to manage legal disputes, for

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regulatory investigation, and for compliance and audits.

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More information on the categories of employee personal data as well as the types and purposes of processing of that data is included in our employee privacy notice available on the Booking.com intranet.

## Candidates

We process candidate data (e.g. contact information, resume or CV, ID document details) for administration and management purposes wherever necessary for the purposes of the job application process at the request of the job applicant.

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More information on the categories of candidate personal data as well as the types and purposes of processing of that personal data is included in our privacy notice available on [careers.booking.com](https://careers.booking.com) and other careers websites we operate as appropriate.

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Given the global nature of Booking.com's business, personal data is transferred at a global scale, including to countries in the EU, Africa, the Middle East, Asia, North America, South America, and Oceania.

## Principles

Our BCRs require Booking.com group entities to process personal data in line with the following data protection principles.

### Transparency, fairness and lawfulness

We comply with local law (including the EU GDPR) where it applies. If applicable data protection law requires a higher level of protection than provided for in our BCRs, we will follow applicable law. We process personal data fairly and where we have a lawful basis for doing so.

We explain to individuals how and for which purposes their personal data will be processed and we do so in a clear and comprehensive way, usually by means of a privacy notice. This information will generally be provided in advance when personal data is obtained by us from the individual. Where we obtain personal data from a source other than that individual, we will provide this information to the individual within a reasonable period and, in any case, within one month after obtaining the personal data, at the time of the first communication to the individual or prior to disclosing the data to a third party. This applies unless there is a legitimate basis for not doing so (for example, where it is necessary to safeguard national security, for the prevention or detection of fraud or other forms of crime, taxation purposes or legal proceedings) and it is permitted by law.

We only process special category or sensitive personal data if absolutely necessary to do so in the context of our business (for instance, if a traveller requests during the reservation process a hotel room which can be accessed by a wheelchair), where applicable law allows us to do so and to the extent necessary to fulfill the purpose.

### **Purpose limitation**

We process personal data for specified, explicit purposes. We will process personal data that we collected previously for a given purpose for a different purpose if this is not incompatible with the purpose for which the data was collected earlier and we have a lawful basis for doing so.

### **Data minimisation and accuracy**

We process personal data which is adequate, relevant and not excessive in order to properly fulfill our legitimate business purposes.

We will update, rectify or delete personal data as appropriate to the circumstances if we know that the personal data is outdated or incorrect. In order to ensure that the personal data we hold is sufficiently accurate and up-to-date, we encourage individuals to inform us when their personal data changes and, where possible, we provide individuals with the possibility to add, update, or remove their personal data via self-service (for instance using their Booking.com account or mobile app). In addition, individuals can at all times exercise their [data subject rights](#) to request us to add, update or remove their personal data.

### **Limited storage periods**

We keep personal data for as long as is necessary for the purposes for which it is collected and further processed. To do this, we maintain and apply record retention policies and procedures which reflect business needs and legal obligations to retain or dispose of personal data.

### **Security**

We maintain and apply a comprehensive set of security policies, procedures and protocols to ensure we have the appropriate technical and organisational measures in place to protect personal data against unauthorised or accidental disclosure, alteration or destruction.

This includes having the appropriate policies and procedures in place to detect, handle and document any personal data breach. A key aspect of this is making sure we notify:

- The relevant parties within our organisation without undue delay;
- The competent EU supervisory authorities within 72 hours after becoming aware of a personal data breach if it is likely to result in a risk to individuals; and
- Affected individuals without undue delay when the personal data breach is likely to result in a high risk to their rights and freedoms.

We ensure that providers of services to Booking.com also adopt appropriate and equivalent security measures.

### **Onward transfers**

We will not transfer personal data under our BCRs to a Booking.com group entity in a country outside the EEA unless we are satisfied that local law and practices applicable to the processing of personal data by this entity do not prevent it from fulfilling its obligations under our BCRs (for example, the country is considered adequate from a data protection perspective by the European Commission (EC)).

In case we transfer personal data onwards to a third party (i.e. not a Booking.com entity) in a country outside the EEA, we will only do so if:

- We can assure that the level of protection of the personal data is not undermined, for example because the country is considered adequate from a data protection perspective by the European Commission (EC) or we have appropriate safeguards (such as EU standard contractual clauses) in place; or
- A specific derogation applies; or
- When the individual has explicitly consented to the transfer; or
- It is necessary for the performance of a contract in their interest.

## Data subject rights

A data subject is any identifiable individual (such as a traveller, trip provider, employee or candidate) whose personal data we collect and process.

The data protection laws in many countries give data subjects certain rights to help them control how their personal data is used and we are committed to enabling individuals to exercise these rights.

Specifically, if you are in the EEA, your data subject rights include the rights of:

- Information;
- Access;
- Rectification;
- Erasure;
- Restriction;
- Notification regarding rectification or erasure or restriction;
- Objection to processing; and
- Right not to be subject to decisions based solely on automated processing, including profiling.

To learn more about these rights and how to exercise them, please see our privacy notices and, in particular, the section on “Your rights”.

## Third-party beneficiary rights and liability

All Booking.com group entities sign an Intra Group Agreement which is a binding commitment to follow our BCRs. If an entity determines that it cannot comply with our BCRs (for whatever reason), it must promptly notify us of this and we will suspend transfers made to that entity under our BCRs. Similarly, transfers under our BCRs to a new group entity will not take place until the new entity has signed the Intra Group Agreement.

An important aspect of our BCRs is that they expressly provide third-party beneficiary rights to individuals. This means that, in case we transfer personal data to one of our entities outside of the EEA under our BCRs and an individual in the EEA whose data is being transferred believes that this entity is not respecting one of the enforceable elements of our BCRs, they can take actions to enforce compliance. These rights include:

- **Enforcement:** Individuals are entitled to submit complaints and seek enforcement of compliance, including the right to initiate judicial remedies and the right to obtain redress and, where appropriate, compensation in case of a breach of one of the enforceable elements of our BCRs;
- **Complaints:** Individuals are entitled to make complaints to a competent EU data protection supervisory authority or to a competent EU national court. In addition, individuals can always still raise complaints directly with us, for example by emailing [dataprotectionoffice@booking.com](mailto:dataprotectionoffice@booking.com). We follow an internal complaint handling procedure to ensure that such complaints are systematically addressed and this will often be the quickest way for an individual to have their concern addressed.
- **Proceedings:** Individuals are entitled to bring proceedings against the Booking.com group entity which is the controller responsible for the export before a competent EU data protection supervisory authority or in a competent EU national court.

A competent EU data protection supervisory authority or competent EU national court will typically be determined by factors such as:

- The EU country where the individual concerned normally lives or works or where the alleged infringement took place; or
- The EU country where the Booking.com group entity which is the controller responsible for the export concerned is based. For example, for transfers of personal data of travellers and trip providers, Booking.com B.V. is typically the controller and for transfers of personal data of candidates, Booking.com International B.V. is typically the controller, both of which are based in the Netherlands.

In case of any proceeding against us with respect to our BCRs, any liability will lie with the Booking.com group entity which is the controller responsible for the export concerned, so typically Booking.com B.V. for transfers of personal data of travellers and trip providers, Booking.com International B.V. for transfers of personal data of candidates and each Booking.com group entity for its transfers of personal data of its employees.

## List of entities

The Booking.com group entities to which these BCRs apply can be found [here](#).