

March 3, 2021

To  
Mr. Glenn Fogel, Chief Executive Officer      Booking.com B.V  
Booking.com B.V

By Email: [shai@tadmor-levy.com](mailto:shai@tadmor-levy.com)

Dear Sir,

**Re: Information Request**

Pursuant to the powers of the General Director of the Israeli Competition Authority (hereinafter **the General Director**) under section 46(b) of the Economic Competition Act 1988 (hereinafter **the Law**)<sup>1</sup>, and since the General Director has found that such will ensure or facilitate the implementation of the Law,<sup>2</sup> Booking.com B.V (hereinafter **the Company**) and Mr Glenn Fogel (hereinafter **the CEO**) are hereby required to provide the documents and information below as soon as possible and no later than **the 10<sup>th</sup> of March 2021**:

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<sup>1</sup> Section 46(b) of the Law stipulates that "every person must, at the demand of the General Director or whomsoever he has so empowered among the civil servants, give him all the information, documents, ledgers, and other certificates that, in the opinion of the General Director, might ensure or ease the implementation of this Statute".

<sup>2</sup> Please note, Booking.com B.V is not the subject of the inquiry – it is therefore a third-party.

The terms below are defined as follows:

**"Hotels list"** – "Herods Palace Hotels & Spa Eilat a Premium collection by Fattal Hotels", "Herods Vitalis Spa Hotel Eilat a Premium collection by Fattal Hotels", "Herods Boutique Eilat a Premium collection by Fattal Hotels", "Queen of Sheba Eilat", "Dan Eilat Hotel", "Royal Beach Hotel Eilat by Isrotel Exclusive Collection", "Isrotel Royal Garden All-Suites Hotel", "Isrotel King Solomon Hotel", "Aria".

Clarification – the names of the hotels in the list match the names of the hotels as they appear on Booking.com and refer to hotels located in Eilat, Israel.

**Unique user** – a user that identified by Booking.com through Cookie Registration ID, or other user identification technological methodology.

1. Please provide the following data for each of the hotels in the hotels list only regarding users who booked a reservation at the hotel via Booking.com, and only for 2019.
  - 1.1. The aggregate annual number of users who booked the hotel via booking.com.
  - 1.2. List separately for every hotel in the hotels list, every other hotel that was viewed (by clicking on the hotel's Booking.com page) by users who booked the hotels in the hotels list. Please limit the "viewing of other hotels period" to the 24 hours prior the time of booking. Please also limit the list of other hotels viewed by hotel-list-

bookers to the 15 most viewed hotels for each hotel in the hotel list and refer only to hotels located in Eilat, Israel.

- 1.3. For each viewed hotel listed in section 1.2 please indicate the aggregate number of views by the hotel-bookers.

Clarification – please only count one view per unique user, regardless of the actual number of click of views during the defined 24 hour period.

Please see the following table for an illustration of the requested data base structure:

List of hotels	The number of users who booked at the hotel during 2019	The number of users who booked at the hotel during 2019 also viewed <b>Hotel-1</b> , 24 hours prior to booking	...	The number of users who booked at the hotel during 2019 also viewed <b>Hotel-15</b> , 24 hours prior to booking
Herods Palace Hotels & Spa Eilat a Premium collection by Fattal Hotels	data input	data input	data input	data input
Herods Vitalis Spa Hotel Eilat a Premium collection by Fattal Hotels				
...				

2. Please provide the following data for each of the hotels in the hotels list only regarding users who booked a reservation at the hotel via Booking.com, and only for 2019.

2.1. The aggregate annual number of users who booked the hotel via booking.com.

2.2. List separately for every hotel in the hotels list, every other hotel that was viewed (by clicking on the hotel's Booking.com page) by users who booked the hotels in the hotels list. Please limit the "viewing of other hotels period" to the 2 weeks prior the day of booking. Please also limit the list of other hotels viewed by hotel-list-bookers to the 15 most viewed hotels for each hotel in the hotel list and refer only to hotels located in Eilat, Israel.

2.3. For each viewed hotel listed in section 2.2 please indicate the aggregate number of views by the hotel-bookers.

Clarification – please only count one view per unique user, regardless of the actual number of click of views during the defined 2 week period.

Please see the following table for an illustration of the requested data base structure:

List of hotels	The number of users who booked at the hotel during 2019	The number of users who booked at the hotel during 2019 also viewed <i>Hotel-1</i> , 2 weeks prior to booking	...	The number of users who booked at the hotel during 2019 also viewed <i>Hotel-15</i> , 2 weeks prior to booking
Herods Palace Hotels & Spa Eilat a Premium collection by Fattal Hotels	data input	data input	data input	data input
Herods Vitalis Spa Hotel Eilat a Premium collection by Fattal Hotels				
...				

If there are documents answering one of the sections of this request that were not prepared by the Company, please submit these documents as well. If these documents are not in your possession and cannot be attained with reasonable efforts on your part, please state in your answer the party in whose possession they can be found, to the best of your knowledge.

Please state explicitly that there is no additional material in your possession beyond the material submitted in your reply to this information request. If you do not have any material or documents answering this information request or any section or part thereof, please state this explicitly.

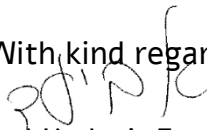
If you wish to answer this request via a person other than the CEO, please state explicitly in your reply that the respondent has been authorized by the CEO and the Company to respond to this data request on their behalf and that the response is submitted on behalf of the CEO.

Please submit all data in the original format the data was created or stored.

The response may be submitted via e-mail ([aviadka@competition.gov.il](mailto:aviadka@competition.gov.il)), or by disk or any other portable device to the authority offices.

I am at your service for any question or clarification on my direct line at: +972-2-5458604 or via the email address above.

With kind regards,



Mr. Aviad Kaduri, Economist  
Israel Competition Authority