



Vacaciones eDreams S.L.

Calle de Manzanares, nº 4, Planta 1,
Oficina 108, 28005
Madrid (Spain)
odigeo.acav@odigeo.com

Edreams S.r.l.

Via Gustavo Fara 26
20124 Milano (Italy)
edreams@pecturismo.it

eDreams International Network SL,

Calle López de Hoyos, 35, 2ª, 28002,
Madrid (Spain)
edreamsinternationalnetwork@legalmail.it

**Edreams International Networks S.L. -
Sucursal Em Portugal**

Rua Herois e Mártires de Angola, 59, Piso
4, B400 4000-285
Porto (Portugal)

Brussels, 03/03/2026

Re: Formal notice: cease and desist and demand for full compensation - Unfair and Aggressive Commercial Practices – eDreams Prime Subscription Service.

Euroconsumers¹, in coordination with its national affiliates, hereby issues this formal notice following the recent decision by the **Italian Competition and Market Authority (AGCM)** in case **PS12853**. The AGCM has established that eDreams has engaged in systematic, unfair and aggressive commercial practices across its digital platforms. Despite the significant fines totaling **€ 9.000.000** imposed by the AGCM, our internal data confirms that these illicit practices remain ongoing, causing widespread financial harm to European consumers.

¹ Gathering five independent national consumer organisations (Testaankoop/Testachats in Belgium, Altroconsumo in Italy, DECO and DECO Proteste in Portugal, OCU in Spain, Proteste in Brazil) and giving voice to a total of more than 6 million people, Euroconsumers is the world's leading consumer group in innovative information, personalised services and defence of consumer's rights.

1. Established violations of consumer protection law

The AGCM's investigation confirmed two primary categories of unlawful conduct:

- **Practice A – Deceptive and Aggressive Enrollment (Fine: € 6.000.000)** : eDreams utilized "dark patterns" and manipulative interface designs to trick consumers into subscribing to eDreams Prime. This includes the use of "reverse price presentation" to make standard prices appear as surcharges, inflated savings claims and the immediate charging of subscription fees to users during supposed "free trials". Furthermore, eDreams aggressively pre-selected the more expensive "**Prime Plus**" option by default at checkout.
- **Practice B - Barriers to Cancellation and Retention (Fine: € 3.000.000)**: eDreams intentionally obstructed consumers' rights to cancel their subscriptions. This included the "48-hour rule" where the cancellation flow was hidden for the first two days of membership, and the use of "confirmshaming" and "nagging" techniques to discourage dissubscription.

2. Evidence of systematic and ongoing harm

Consumer complaints collected by our organizations demonstrate that eDreams continues to disregard European consumer law:

- **Italy (Altroconsumo)**: between January 2023 and February 2026, **1.087 complaints** were filed via *Reclama Facile*. Notably, 76.6% of these relate specifically to the practices sanctioned by the AGCM, proving the conduct has not ceased.
- **Spain (OCU)**: Approximately **1.300 complaints** were recorded between January 2025 and February 2026. Key grievances include unauthorized charges for Prime (~750 cases) and deceptive "Free Trial" mechanisms (~250 cases).
- **Portugal (DECO PROteste)**: in 2025 alone, **291 complaints were filed**, with current 2026 data showing a sustained frequency of grievances regarding automatic renewals and misleading advertising.
- **Belgium (Testachats/Testaankoop)**: between January 2023 and March 2026, a total of **211 complaints were received**. Alarming, 150 of these (71%) specifically concern the practices sanctioned by the AGCM. Data shows a clear year-on-year surge in these specific grievances, rising from a 58% share in 2023 to 84% in the first quarter of 2026 alone. The most common issues cited include unwanted subscriptions—often triggered by mandatory "Prime" checkboxes during booking—unreachable customer service for trial cancellations, and benefits that fail to meet advertised value.

The AGCM found that eDreams acted with **full awareness**, deliberately structuring its interfaces to exploit cognitive biases and consumer vulnerabilities for profit.

3. Formal demands

Euroconsumers and its member organizations hereby demand that eDreams:

1. **CEASE AND DESIST** immediately from all deceptive and aggressive commercial practices identified by the AGCM, including but not limited to pre-selected checkboxes, hidden cancellation buttons and misleading price comparisons.

2. **PROVIDE FULL RESTITUTION** to all consumers who were:
 - charged for eDreams Prime without explicit, informed consent.
 - denied a free trial despite promotional offers.
 - charged for "Prime Plus" due to default pre-selection
 - prevented from cancelling their subscriptions due to hidden or obstructed digital flows.
3. **REVISE** all digital interfaces (web and app) to ensure total transparency regarding subscription costs, renewal terms and cancellation procedures, in compliance with professional diligence standards.

4. Further action

Failure to provide a satisfactory response and a comprehensive remediation plan within **30 days** will leave Euroconsumers and its national affiliates with no choice but to initiate further legal proceedings, without further notice, including potential cross-border collective actions and formal requests for additional sanctions from relevant European national authorities.

We expect your prompt confirmation of receipt and a detailed plan for consumer compensation.

Please acknowledge receipt of this letter at your earliest convenience.

Sincerely

Marco Scialdone
Head Of Litigation
Euroconsumers

Firmato da:

EUROCONSUMERS
Empower people, improve the market.
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Carine Seron
Legal Counsel
Euroconsumers

Signed by:

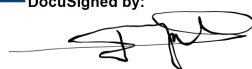
EUROCONSUMERS
Empower people, improve the market.
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Julie Frère

Domain Head
Communication & Public
Affairs

Testachats/Testaankoop



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Bianca Luongo

DPC lawyer
Altroconsumo



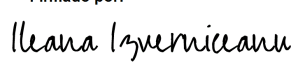
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Ileana Izverniceanu

Manager Corporate
Affairs and Public
Relations
OCU




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Magda Canas

Corporate Affairs and
Public Relations Officer

DECO PROTeste



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