

[Basic Policy]

**Built on a foundation of security and trust
“the wings within ourselves” help to fulfill
the hopes and dreams of an
interconnected world.**

ANA will always offer safe and hospitable service within the air transportation industry, in accordance with the above Mission Statement.

Within ANA's business operations, our customers' personal information is essential in order for us to provide fully satisfactory services. We recognize the importance of the information received from our customers, and make efforts to take the utmost care in handling such information. In order to have our customers utilize ANA with a sense of safety and trust, we educate our executives and employees thoroughly about laws and company regulations related to personal information, and have established our company's structure to include measures for safety, thereby exerting maximum effort toward appropriate management and use of each customer's personal information.

The customer's ANA Mileage Club membership number, type of membership card, member service qualification, membership area, mileage status, credit card number and expiration date, usage history of credit card and related information, need for wheelchair or other special arrangement, flight reservation/cancellation information, usage history of boarding/services, etc.

(3) Details of inquiry/inquiries to ANA, usage history of ANA's website/application, etc. and related information

ANA will never obtain and use information of a sensitive nature to the customer (hereinafter, “sensitive information”), such as information on race, beliefs, social standing, history of illness, crime records, and history of having been afflicted by crime, unless required by laws and regulations or by the consent of the customer.

5. Choice by the customer

As a rule, ANA obtains personal information by the volition of the customer. Customers may experience disadvantages if they refuse to provide their personal information, such as being unable to make use of the various services provided by ANA, or being unable to receive campaign notices and other ANA information because a part of the functions of ANA's system become inoperable and thereby unavailable. Please note that customers may change their contact information as well as their decision on whether or not they wish to receive email magazines at any time they wish, in a manner designated separately by ANA.

6. Disclosure and provision of information to a third party

ANA will not disclose or provide personal customer information to any third parties except under the following circumstances. Also, customers' personal information including sensitive information will not be disclosed or provided to third parties under any circumstances, unless allowed by laws and regulations or by consent of the customer. Note that provision of information to data sharing partners and business entrusted companies are not deemed to constitute disclosure or provision to third parties.

- (1) Customer consent has been obtained.
- (2) Disclosure or provision is required within the scope allowed by laws or regulations.
- (3) Disclosure is required to protect human life, health, or property in cases where obtaining customer consent is difficult.
- (4) Disclosure is required to cooperate with the public affairs of national or local governments, and when obtaining customer consent is likely to hinder the administration of public affairs.
- (5) Disclosure or provision of information as statistical data (in a format that does not disclose the customer's identity).
- (6) Provision of information as a result of the succession of business due to a merger, company split, transfer of business or otherwise.
- (7) Provision of information in accordance to procedures based on laws and regulations, under the condition that the following information can be easily checked by the customers themselves through the ANA website, etc., and that the customers have not declared their wish to refuse provision of their information.
 - 1) The purpose of obtaining information is to provide such information to a third party
 - 2) Specific personal data items to be provided to a third party
 - 3) The means by which such personal information is provided to a third party
 - 4) Provisions of information will be suspended upon the customers' request
 - 5) Methods for accepting requests from customers

7. Data sharing

ANA will share customer information as follows.

Scope of entities that can share data	ANA Group companies
Purpose of using data by the user	(1) For provision of air transportation services, travel services including tours and hotels, and other products/services handled by the Company or companies that share data (2) For sending of direct mail and information on products/services, and distribution of questionnaire(s) to customers, etc. by the Company or companies that share data (3) For sales analysis, other research/studies, and development of new products/services, etc. by the Company or companies that share data (4) For delivery and transfer of data when we receive inquiries, application for use or other offers from customers regarding products/services provided by the Company or companies that share data (5) For appropriate and smooth fulfillment of other transactions with customers by the Company or companies that share data (6) For business management/internal management by the ANA Group
Items of personal information to be shared	The customer's ANA Mileage Club membership number, the customer's name, address, telephone number, fax number, email address, place of employment (company name, division/department the customer belongs to, title, address, telephone number, fax number), mailing address, passport information, type of membership card, member service qualification, membership area, mileage status, credit card number and expiration date, usage history of credit card and related information, need for wheelchair or other special arrangement, flight reservation/cancellation information, usage history of boarding/services, details of inquiry/inquiries, usage history of ANA's website/application, etc. and related information, etc.
Party responsible for management of personal information	ANA Holdings INC.

Chapter 1. Handling of Personal Information at ANA

1. Introduction

The Privacy Policy explains how personal information obtained by ANA from customers is utilized. Please read this Privacy Policy carefully when using ANA's services and products. Use of ANA's services and products constitutes as having fully understood and agreed to this Privacy Policy.

2. Scope of application

The Privacy Policy will apply when customers use ANA's services and products.

3. Purpose of using personal information

ANA utilizes personal information obtained from customers for the following purposes:

- (1) Reservations, ticket sales, check-in, airport services, and in-flight services with regard to air transport services
- (2) Reservations, ticket sales, check-in, and airport services for interline transportation, joint acceptance of carriage, code share, successive carriage and consigned carriage
- (3) Service provisions for ANA Mileage Club members
- (4) Guidance, provision, and management of other services and products offered by ANA
- (5) All operations incidental or related to the above (1) – (4)
- (6) Implementation of questionnaires concerning service and products, etc., offered by ANA
- (7) Development of new services and products
- (8) Guidance, operation, management and information provision for various events and campaigns
- (9) Notification of services and products offered by ANA
- (10) Guidance, operation, management and notification of services, products, events and campaigns of ANA Group companies and partner companies
- (11) Response to inquiries and requests

* In addition to the above-mentioned purposes, personal information will be utilized for the purposes described in “7. Data sharing.”

4. Acquisition of personal information

ANA will obtain the following personal information by fair and appropriate means for the purpose of achieving the previously mentioned purposes.

- (1) Personal information provided to ANA by the customer to apply for ANA's services, etc.
The customer's name, address, telephone number, fax number, email address, place of employment, mailing address, passport information, physical and medical information relating to boarding, religious dietary restriction, etc.
- (2) Information on ANA Mileage Club membership and information related to the usage of applicable services, etc.

8. Business entrustment

In providing products and services to customers, ANA may entrust a part of its business operations to third parties to which personal information may also be disclosed to the extent required to achieve the purpose of the entrustment. In these cases, ANA will implement all appropriate measures in managing and supervising such third parties to safeguard the handling of customers' personal information, including establishing agreements on the handling of such personal information.

9. Transfer to outside of Japan

If ANA provides customers' personal information to third party business operators outside of Japan, including business entrusted companies and data sharing partners, ANA will take necessary and appropriate measures in keeping with laws and regulations.

10. Management of personal information

In receiving customers' personal information, ANA will manage such information according to the strictest standards and take the utmost care to prevent leaks, loss, or alterations. ANA ensures that the board members and employees are properly trained regarding appropriate handling to safeguard the security of information identifying individual customers. An appropriate retention period for personal information will be established in accordance with the purpose for which such information is used. After the purpose of the information has been achieved, ANA will dispose of the information in question by appropriate methods.

11. Request about handling of Personal Information

If ANA receives a request from a customer, submitted in the manner specified, for the disclosure, correction, deletion, addition, discontinuance, or erasure (hereinafter, "disclosure, etc.") of the customer's personal information stored in a database held by ANA, the request will be handled according to the laws and regulations as follows, within a reasonable timeframe and scope, after confirming that the request was submitted by the customer themselves.

- (1) Request for disclosure
Personal information items will be disclosed in accordance with the customer's request.
- (2) Request for correction, deletion, or addition
Correction, deletion, or addition of personal information will be undertaken wherever possible after due review of the request.
- (3) Request for discontinuance or erasure
The use of personal information items designated by the customer will be discontinued, and the relevant information erased if so desired, in accordance with the submitted request. However, please note that such requests may prevent customers from being provided with services that they had utilized, or may impede the provision of services in accordance to their wishes.

ANA may not be able to fulfill the customers' requests if compliance with such requests would seriously impact ANA's business operations, or result in a violation of laws and regulations.

12. Submission of request for disclosure, etc.

The method for submitting requests for disclosure, etc., or notification of purpose of use of personal information (hereinafter, "requests for disclosure, etc.") received by ANA from customers, are as follows.

Request for disclosure, etc.

- 1) Method for submitting request
Please send the required documents by postal mail to the address below.
Address:
Personal Information Handling Desk, All Nippon Airways Co., Ltd.
1-331-90 Kaminoshima-cho, Nagasaki-shi, Nagasaki, 850-0078 Japan
- 2) Required documents
 - **Application form (choose one of the following in accordance with your request)**
 - (1) Form requesting disclosure
 - (2) Form for various requests
Customer requests for disclosure, etc., may not be acknowledged if any of the required information is missing.
 - **Documents required for confirmation of identification of individual, etc.**
 - <For the individual>
 - (1) Copies of two from the following: driver's license, passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent resident certificate, certificate of seal registration, Individual Number Card (front page only)
 - <For a representative>
 In addition to "<For the individual>," the following documents described in (1) and (2) are required.
 - (1) Letter of trust (legal representatives must provide a certifying document)
 - (2) Documents to identify the representative (copies of two from the following: driver's license, passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent certificate, certificate of seal registration, Individual Number Card (front page only))
- 3) Fee
A fee will be charged depending on type of request. For disclosure of multiple reservations and boarding information, each flight will be counted as one item of disclosure. Please note that handling procedures may differ depending on the laws and regulations of the relevant country.

*Please note that Regular ANA reservation confirmations and boarding confirmations and Reissuing lost cards/Updating ANA Mileage Club member information, etc. are handled on the ANA website (www.ana.co.jp/eng) or at the ANA contact center. Requests will only be complied if customer identification can be confirmed.

13. Modification of the Privacy Policy

ANA may make modifications to this Privacy Policy. If modifications are made, details will be posted on the ANA website (www.ana.co.jp/eng), so please be sure to read carefully the contents of any changes that have been made.

Chapter 2. Handling of personal information of EEA residents at ANA

Besides Chapter 1, Chapter 2 also shall be applied to the handling of personal information of persons residing in the European Economic Area (hereinafter referred to as "EEA") based on the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive "95/46/EC". In the event that any provisions of this chapter contradict those of chapter 1, the provisions of this chapter shall prevail.

1. Introduction

A guardian's consent or permission must be obtained in the event that a customer under the age of 16 uses ANA's service and consents to this Privacy Policy. The data subject's consent to this Privacy Policy must be obtained in the event that a person such as family member apply for ANA's service on behalf of the data subject.

2. Request about handling of Personal Information

If ANA receives a request from an EEA resident, submitted in the manner specified, for the withdrawal of consent, data portability, or objection to data processing besides Chapter 1 Article 11 (hereinafter, "withdrawal, etc.") of the customer's personal information stored in a database held by ANA, the request will be handled according to the related laws and regulations as follows, within a reasonable timeframe and scope, after confirming that the request was submitted by the customer themselves.

(1) Request for withdrawal

Personal information will be deleted or suspended in accordance with the customer's request, wherever possible and appropriate, after due review of the request.

However, please note that such requests may prevent customers from being provided with services that they had utilized, or may impede the provision of services in accordance with their wishes.

(2) Request for data portability

A copy of the personal information held by ANA will be provided in accordance with the customer's request, wherever possible and appropriate, after due review of the request.

(3) Objection to data processing

The use of personal information will be suspended, wherever possible and appropriate, after due review of the request.

(4) Making a request or an objection

Customers may submit above by the method provided in Chapter 1 Article 12. Customers may use the following forms for submission.

- (1) Form requesting disclosure <For EEA residents>
- (2) Form for various requests <For EEA residents>

3. Retention period for personal information

ANA retains customers' personal information until the purpose of use is achieved. Particularly, ANA has set the retention period for personal information as follows.

(1) Personal information of ANA Mileage Club membership

Until withdrawal of the ANA Mileage Club membership

(2) Personal information of passengers

Until completion of transportation and related services stipulated in conditions of domestic transport of passengers and conditions of international transport

(3) Other personal information

Required period for the purpose which customers have consented

4. Transfers

When we share personal information of customers or entrust it to third parties within the scope of the purposes of use, there is a possibility that ANA will transfer personal information to companies that can share data or trustee(s) and such third parties will handle it. Since countries located outside the EEA are among the locations of third parties to whom ANA will disclose the personal data of the customers, the customers shall be deemed as having consented to the following matters by consenting to the Privacy Policy. It should be noted that Japan has received official accreditation in terms of adequacy by the European Commission for the reason that a data protection law equivalent to that in the EEA exists in Japan.

- (1) In the case that the country in which the third party is located is outside the EEA, such country does not have the same data protection laws as the EEA, many of the rights provided in the EEA to the data subjects of the data will not necessarily be provided.

- (2) The customers' personal data may be provided for the purposes specified above to the subsidiaries and affiliates of ANA or third parties outside the EEA.

5. Change of purposes of use of personal data

In the case of a change to the purposes of use of personal data, ANA will announce the revised Privacy Policy in advance on ANA website (www.ana.co.jp/eng).

6. Lodging a complaint with an authority

Customers have the right to lodge a complaint on the processing of their personal data with the data protection authority having jurisdiction over their residence. Please use the following URL to contact the authority having jurisdiction over your residence:
(http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

7. The contact information of Controller of personal data and data protection officer

Controller of personal data : ALL NIPPON AIRWAYS co., Ltd.
Address: Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku,
Tokyo, Japan

ANA's data protection officer: anag_infosec@ana.co.jp

Chapter 3. Handling of personal information of residents of China at ANA

Besides Chapter 1, Chapter 3 also shall be applied to the handling of personal information of persons residing in the People's Republic of China (hereinafter, "China") based on China Cyber Security Law and related regulations. In the event that any provisions of this chapter contradict those of chapter 1, the provisions of this chapter shall prevail.

1. Introduction

A guardian's consent or permission must be obtained in the event that a customer under the age of 18 uses ANA's service and consents to this Privacy Policy. The data subject's consent to this Privacy Policy must be obtained in the event that a person such as family member apply for ANA's service on behalf of the data subject.

2. Retention period for personal information

ANA will retain the customer's personal information until the purpose of use is achieved. In particular, ANA sets the retention period for personal information as follows.

- (1) Personal information of ANA Mileage Club membership
Until ANA Mileage Club membership cancellation.
- (2) Passengers' personal information
Until the completion of transportation and related work stipulated in conditions of carriage –domestic passenger and baggage- and –international passenger and baggage-.
- (3) Other personal information
Required period for the purpose which customers have consented.

3. Technology and measure to protect customers' personal information

- (1) ANA takes security measures to protect customers' personal information from leakage, loss or damage. Specifically, ANA takes the following measures to protect customers' personal information.
 - ANA develops website with https and sets SSL encryption to secure important customers' data (credit card information, etc.) communication between the customers' web browser and the server.
 - ANA uses encryption technology for protecting personal information.
 - ANA sets access control for protecting unauthorized person from accessing personal information.
 - In order to raise employee awareness of the importance of protecting personal information, ANA provides education and training on security and privacy protection.
- (2) ANA will take all reasonable and practicable steps to ensure that no irrelevant personal information is collected. ANA will only retain customers' personal information for the period of time required to achieve the purposes stated in this Privacy Policy, unless an extension of the retention period is required or permitted by law.
- (3) In the event of personal information being at risk, ANA will promptly inform customers of the relevant circumstances of the incident in accordance with the requirements of laws and regulations and report the regulatory authorities.

4. Request about handling of Personal Information

In the event that ANA receives a request of the customer's personal information held by ANA from a resident of China, the request will be handled according to the related laws and regulations within a reasonable timeframe and manners besides Chapter 1 Article 11 ("withdrawal, etc."), after confirming that the request was submitted by the customer himself/herself.

- (1) Request for withdrawal
Personal information will be deleted or suspended in accordance with the customer's request, wherever possible and appropriate, after due review of the request.
However, please note that such requests may prevent customers from being provided with services that they had utilized, or may impede the provision of services in accordance with their wishes.

- (2) Methods for submission of requests

Customers may submit requests (except (2) cancel the account) by following methods.

- 1) Submission of requests

Website : Please send the required documents via webform listed on ANA's website
(https://contact-en.ana.co.jp/app/ask_atmint_pcen)

- 2) Required documents

• Application forms

- (1) Form requesting disclosure <For residents in China>
- (2) Form for various requests <For residents in China>

• Documents required for confirmation of identification of individual, etc.

<For the individual>

- (1) Copies of two of the following: passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent resident certificate, certificate of seal registration, Individual Number Card (front page only), identification card issued by the Chinese government

<For a representative>

In addition to "<For the individual>," the following documents described in (1) and (2) are required.

- (1) Letter of trust (legal representatives must provide a certifying document)
- (2) Documents to identify the representative (copies of two of the following: the representative's passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent resident certificate, certificate of seal registration, Individual Number Card (front page only), identification card issued by the Chinese government)

- 3) Contact Us
China 4008-82-8888

5. Transfers

When we share personal information of customers or entrust it to third parties within the scope of the purposes of use, there is a possibility that ANA will transfer personal information to companies that can share data or trustee(s) and such third parties will handle it. Third parties to whom ANA will disclose the personal information of the customers include those located outside China (including Japan), the customers shall be deemed as having consented to the following matters by consenting to the Privacy Policy:

- (1) In the case that the country which the third party is located outside China does not have the same data protection laws as China, many of the rights provided in China to the data subjects will not necessarily be provided.
- (2) The customers' personal information may be provided for the purposes specified above to the subsidiaries and affiliates of ANA or third parties outside China.

6. Change of purposes of use of personal data

In the case of a change to the purposes of use of personal information, ANA will announce the revised Privacy Policy in advance on ANA website (www.ana.co.jp/eng) and ANA will use personal information in accordance with the new purposes of personal information after obtaining consent from customers.

7. Basic information of Controller of personal information

ALL NIPPON AIRWAYS co., Ltd.

Address: Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku, Tokyo, Japan

Chapter 4. Handling of personal information of California residents at ANA

Besides Chapter 1, Chapter 4 also shall be applied to the handling of personal information of persons residing in California, United States of America based on the California Consumer Privacy Act of 2018. In the event that any provisions of this chapter contradict those of chapter 1, the provisions of this chapter shall prevail.

1. Acquisition of personal information

Personal information collected by ANA in the preceding 12 months is as defined in Chapter 1 Article 4 (Acquisition of personal information). ANA will acquire those personal information directly from customers.

2. The sale of personal information

ANA will not sell customers' personal information to any third parties.

3. Request about handling of Personal Information

In the event that ANA receives a request of the customer's personal information held by ANA from a California resident, the request will be handled according to the related laws and regulations within a reasonable timeframe and manners besides Chapter 1 Article 11 ("withdrawal, etc."), after confirming that the request was submitted by the customer himself/herself. As a rule, ANA will not change services because of such requests.

Customers may submit requests by following methods.

1) Submission of requests

Website : Please send the required documents via webform listed on ANA's website
(https://contact-en.ana.co.jp/app/ask_atmint_pcen).

Tell : Please contact the following
U.S. 1-800-235-9262 (Toll-free)
310-782-3011 (Charged)

2) Required documents

• Application forms

- (1) Form requesting disclosure <For residents in California>
- (2) Form for various requests <For residents in California>

• Documents required for confirmation of identification of individual, etc.

<For the individual>

- (1) Copies of two of the following: driver's license, passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent resident certificate, certificate of seal registration, Individual Number Card (front page only), social security card, green card, identification card issued by the government of California

<For a representative>

In addition to "<For the individual>," the following documents described in (1) and (2) are required.

- (1) Letter of trust (legal representatives must provide a certifying document)
- (2) Documents to identify the representative (copies of two of the following: the representative's driver's license, passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, resident card or special permanent resident certificate, certificate of seal registration, Individual Number Card (front page only), social security card, green card, identification card issued by the government of California)

Please note that discontinuance and/or deletion requests may prevent customers from receiving services which customers have been provided with, or may impede the provision of services in accordance with such requests.