

ANA Privacy Policy

[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.

April 1, 2013

ALL NIPPON AIRWAYS CO., LTD.

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

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, business contact, mailing address, physical and medical information relating to boarding and creedal, religious dietary restriction etc.
- (2) Information on ANA Mileage Club membership and information related to the usage of applicable services, etc.
The customer's ANA Mileage Club membership number, member card type, member service qualification, membership area, mileage status, credit card number and expiration date, need for wheelchair and other special arrangements, flight reservation and cancellation information, boarding status, etc.

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 Data Sharing	ANA HOLDINGS INC.	Air Japan Co., Ltd ANA WINGS Co., Ltd.	ANA Sales Co., Ltd. companies*
Purpose of use by the user	(1) For development of new services and products, etc. (2) For notification of new products and services by direct mail, etc. (3) For delivery and transfer to relevant company in the event of an inquiry, application for use or other request from a customer regarding products and services provided by ANA Group companies. (4) For appropriate and smooth fulfillment of other transactions with customers, etc.	Provision of air transportation services	Provision of information required for tours, hotels, and other air travel services and related operations
Personal information items to be shared	ANA Mileage Club membership number, customer name, address, telephone and fax numbers, email address, business contact (name of company, department, title, address, telephone and fax numbers), mailing address, member card type, member service qualification, membership area, mileage status, credit card number and expiration date, need for wheelchair and other special arrangements, flight reservation and cancellation information, boarding status, etc.		ANA Mileage Club membership number, customer name, address, telephone and fax numbers, email address, business contact (name of company, department, title, address, telephone and fax numbers), mailing address, member card type, member service qualification, membership area, mileage status, credit card number and expiration date, need for wheelchair and other special arrangements, etc.
Party responsible for management of personal information	All Nippon Airways Co., Ltd.		

* ANA Sales Co., Ltd. companies:

ANA Sales Co., Ltd.; ANA Tours China Co., Ltd. (Beijing); ANA Tours China Co., Ltd. (Shanghai Branch Office); ANA Sales Americas

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 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 (PDF format / 156KB)
 - (2) Form requesting modification (PDF format / 117KB)
 - (3) Form requesting discontinuance of usage (PDF format / 115KB)
 - (4) Form requesting purpose of use (PDF format / 114KB)
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 (Both (1) and (2) below 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. 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 of lost cards/Updating member information are handled on the ANA website (<https://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 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(PDF format / 152KB)
- (2) Form requesting modification (PDF format / 117KB)
- (3) Form requesting discontinuance of usage (PDF format / 115KB)
- (4) Form requesting purpose of use (PDF format / 112KB)
- (5) Form requesting withdrawal of consent(PDF format / 118KB)
- (6) Form requesting data portability(PDF format / 119KB)
- (7) Form requesting objection to processing(PDF format / 117KB)

3. Transfers

ANA may provide the customers’ personal data to third parties, such as its affiliates, cloud vendors and its outside contractors, etc. to implement the purposes of use specified above. Since countries located outside the EEA (including, without limitation, Japan, the U.S., the same shall apply hereafter) 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:

- (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.

4. 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).

5. 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).

6. The contact information of data protection officer

You can contact ANA’s data protection officer at anag_infosec@ana.co.jp.