

[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 always offers safe and hospitable service in its air transportation service, in accordance with the above Mission Statement.

In ANA's business operations, our customers' personal information is essential 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.

For our customers utilize ANA with a sense of safety and trust, we educate our executives and employees thoroughly about laws and company regulations relating to personal information, and have established our company's structure to include measures for security, thereby exerting maximum effort toward appropriate management and use of each customer's personal information.

Chapter 1. Handling of Personal Information by ANA

1. Introduction

This Privacy Policy explains how and why the personal information of customers and other individuals obtained by ALL NIPPON AIRWAYS CO., LTD. (“ANA”, “we”, “our” or “us”) is used. Please read this Privacy Policy carefully before providing personal information to ANA or using our products or services.

Chapter 1 of this Privacy Policy provides an overview of how we use your personal information. Chapters 2, 3 and 4 provide territory-specific information for customers in the European Economic Area /United Kingdom, the People's Republic of China and the State of California (U.S.A), respectively.

Additional policies may apply to certain ANA products or services, details of which will be provided alongside the terms of such service.

2. Scope of application

The Privacy Policy will apply when customers and other individuals provide personal information to ANA or use ANA's services and products.

3. Purpose of using personal information

ANA utilizes personal information obtained from its 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, codeshare, 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 purposes (1) through (4) above
- (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 Chapter 1 Article 7 (Data sharing) below.

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) Identity, contact and payment information, etc.
The customer's name, address, telephone number, fax number, email address, employment information (company name, division/department the customer belongs to, title, address, telephone number, fax number), mailing address, passport information, physical and medical information relating to flying, dietary restrictions, payment information including details of credit/debit card and other payment methods, etc.
- (2) Travel information
Details of travel plans and arrangements, including flights with ANA and other airlines, accommodations, and other transportation arrangements, etc.
- (3) Information on the customer's ANA Mileage Club membership and information related to the usage of eligible services
The customer's ANA Mileage Club membership number, type of membership card, membership status, 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 and cancellation information, usage history of flights and other services, etc.
- (4) Details of enquiries and complaints to ANA
Details of enquiries, requests and complaints contained in correspondence with customers, (including their cause and resolution), etc.
*We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.
- (5) IT and system data, including about the usage of the ANA website and mobile application
Information on the use of ANA website and mobile application including cookie and action log on the website, 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 may share customer information as follows.

Scope of entities that data can be shared	ANA Group companies
Purpose of using data by the user	<ol style="list-style-type: none"> (1) For provision of air transportation services, travel services including tours and hotels, and other products/services handled by ANA 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 ANA 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 ANA or companies that share data (5) For appropriate and smooth fulfillment of other transactions with customers by ANA 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, employment information (company name, division/department the customer belongs to, title, address, telephone number, fax number), mailing address, passport information, physical and medical information relating to flying, dietary restrictions, payment information including details of credit/debit card and other payment methods, details of travel plans and arrangements, including flights with ANA and other airlines, accommodations, and other transportation arrangements, type of membership card, membership status, 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 and cancellation information, usage history of flights and other services, details of enquiries, requests and complaints contained in correspondence with customers, information on the use of ANA website and mobile application, including cookie and action log on the website, etc.
Party responsible for management of personal information	ANA Holdings Inc.

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 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 to comply 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 ("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 or purpose of usage will be disclosed in accordance with the customers' 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 ("requests for disclosure, etc.") received by ANA from customers, and contact information 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 individuals>

- (1) Copies of two from the following: driver's license, passport, health insurance certificate (masking insurance card numbers and identification symbols / numbers of insured individuals), 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 representatives>

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

- (1) Power of Attorney (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 (masking insurance card numbers and identification symbols / numbers of insured individuals), 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 ANA reservation confirmations, boarding confirmations and a updating ANA Mileage Club member information, etc. are handled on the ANA website (www.ana.co.jp/eng) or at the ANA telephone 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).

Chapter 2. Handling of personal information of EEA and UK residents by ANA

1. Introduction

This Chapter 2 provides additional information about the handling of personal information of customers and other individuals in the European Economic Area (“EEA”) and/or the United Kingdom (“UK”) in accordance with EU General Data Protection Regulation 2016/679 (“GDPR”) and the UK Data Protection Act 2018 (“DPA 2018”) and other national and international data protection and privacy laws (together, “Data Protection Laws”).

Please note that the UK’s laws are similar to those in the EEA, and customers from both jurisdictions have very similar rights. Accordingly, references to the GDPR in this Chapter should also be read as references to corresponding UK law.

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.

In the event that any provisions of this Chapter 2 contradict those of Chapter 1, the provisions of this Chapter 2 shall prevail.

2. The controller of personal information

The controller of your personal information is ANA.

ANA protects personal information which is collected and used by controllers (who make decisions about how and why your personal information is used) and processors (who act on the controller’s written instructions) on the basis of Data Protection Laws.

3. Our lawful basis for processing personal information

ANA protects your personal information by ensuring that it can only be used to the extent necessary for specific purposes (as set out in Part 3 of Chapter 1 of this Privacy Policy) and by requiring that there is a lawful basis for each processing activity on the basis of Data Protection Laws.

ANA may process customer personal data on one or more of the following lawful bases:

- (1) When your consent is obtained to the processing (Article 6(1)(a) GDPR)
Consent will usually only be relied upon for promotional and marketing related processing, or in some cases, in relation to sensitive personal data.
- (2) When processing is necessary in order to perform or take steps to enter into a contract (Article 6(1)(b) GDPR).
This is typically why we process customer information which is essential to providing our services, including a customer’s identity, contact, payment and travel details, etc.
- (3) ANA needs to process the information to comply with a lawful obligation (Article 6(1)(c)). This includes the requirement to share personal information with customs and immigration authorities or law enforcement, as well ANA’s legal duties towards its staff and customers.
- (4) The information is required to protect your, or a third party’s, vital interests (Article 6(1)(d)), for example in the event of a medical emergency.
- (5) It is in ANA’s or a third party’s legitimate interests to process the personal data, and these interests are not overridden by your rights under Data Protection Laws (Article 6(1)(f) GDPR). This includes the use of personal information necessary to operate ANA’s business and also to maintain, develop and improve its products and services and provide the best possible customer experience.

4. Request about handling of Personal Information

(1) Data Protection Laws provide you with the following legal rights:

- 1) Request for disclosure: You can request copies of your personal information and details of how we process it.
- 2) Request for correction or updating: Corrections or updates to personal information will be undertaken wherever possible after due review of the request.
- 3) Request for erasure: You may request that we delete all or part of the personal information we hold about you. We will consider your request and, where the information is no longer required or the law does not permit us to continue to retain it, we will delete it.

4) Transferring your personal information: You can request a copy of your personal information in a structured, common, machine-readable format. This only applies to personal information which we obtain from you and process on the basis of your consent or in order to perform a contract, and which is processed by automated means.

5) Objecting to processing: You can object to processing which is carried out on the basis of our or a third party’s legitimate interests or for the purpose of direct marketing. We will stop processing your information unless we have a strong reason to continue which overrides your objection. If your objection is to direct marketing, we will always stop.

6) Restricting how your personal information is processed. You can limit how we process your personal information in certain circumstances. Where this applies, any processing of your personal information (other than storing it) will only be lawful with your consent or where required for legal claims, protecting certain rights or important public interest reasons.

7) The right to withdraw consent. If we are relying on consent to process your personal information, you have the right to withdraw that consent at any time.

Please note, the rights set out above are not absolute and do not apply in every situation. There are also legal exemptions which apply in some situations and mean a request may be refused. Of course, if a request is refused we will inform you of the reasons for this when we respond.

Records of requests made to us will be retained so that we can ensure we have complied with our legal obligations.

(2) Method for submitting request

You can exercise your rights free of charge (except in the case of unreasonable, excessive or repeated requests in which case we may charge a fee or refuse the request). The method for submitting request and contact information are as follows.

(Website)

Please send the required documents via webform listed on ANA’s website.

(https://www.ana.co.jp/other/faq_atena/meta/0519.html)

(Required documents)

- Form requesting disclosure (for EEA/UK residents).
- Form for various requests (for EEA/UK residents).

(3) Responding to a request

We will respond without delay and usually within one month. We may, in some cases, ask for identification or (if you are making the request on behalf of a third party) proof of your authority to submit a request. If your request is particularly complex or you have made a number of requests, it may take longer to provide a detailed response. Please also bear in mind that there are exceptions to the rights above and some situations where they do not apply.

If you are not satisfied with our response to a data protection request or if you think your personal information has been mishandled, then you have the right to complain to a supervisory authority. Please see Part 9 of this Chapter 2 (“Lodging a complaint with an authority”) for further details.

5. Data sharing which is necessary to provide products or services

ANA’s products and services are provided with the assistance of other companies and organizations and often ANA will need to share personal information with third parties in order to run its business. These third parties include:

- (1) Other companies in the ANA Group
- (2) Organizations with which ANA is legally required to share personal information including: government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.
- (3) Service providers including: subcontractor handling ANA flights, airports and airlines who we partner with, various service providers, providers with whom we have a marketing partnership, etc.

Where ANA instructs companies, contractors or service providers to process data on its behalf, then it will ensure that it does so pursuant to a contract which meets the requirements of applicable Data Protection Laws.

6. Marketing communications

ANA sends out marketing communications from time to time to notify interested persons of news and provide details of products and services which may be of interest to them. ANA will only do this if the recipient has consented to receive marketing or if they are an existing customer who purchased products or services from ANA and were given the opportunity to opt-out from marketing at the time but chose not to do so.

7. Where your personal information is stored and transferred

ANA is located in Japan and many of the service providers and other organizations with whom we share your personal information will be located in jurisdictions outside the EEA and UK. It should be noted that Japan has been recognized by the European Commission as providing adequate protection for personal information.

When transferring personal information to third parties ANA will ensure that it complies with the requirements of Data Protection Laws, including the onward transfer requirements of the EU-Japan adequacy decision and related Japanese laws. However, you should be aware that recipients outside the EEA and UK may be subject to national laws which do not necessarily provide equivalent protection for your personal data. If you would like more information regarding where your personal information is stored and transferred please contact ANA using the details set out in Part 12 of this Chapter 1 ("Submission of request for disclosure, etc.").

8. Retention of 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. For most other personal information, the appropriate retention period will be determined based on the nature of the information and the purpose for having it by reference to legal and accounting requirements and our business needs.

- (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 Carriage for Domestic Flights and Conditions of Carriage for International Flights
- (3) Other personal information
Required period for the purpose which customers have consented

9. Lodging a complaint with an authority

Customers have the right to lodge a complaint on the processing of their personal information with the data protection authority having jurisdiction over their residence.

- (1) EEA residents: Please contact your national supervisory authority, details of which can be found on the European Data Protection Board's website (https://edpb.europa.eu/about-edpb/board/members_en).
- (2) UK residents: Please contact the Information Commissioner's Office (www.ico.org.uk).

10. The contact information of the controller and ANA's Data Protection Officer

Controller: ALL NIPPON AIRWAYS CO., LTD.

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

Data protection officer email: anag_infosec@ana.co.jp

Chapter 3. Handling of personal information of China residents by 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 a family member applies 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 to 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 (Request about handling of Personal Information), 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 by following methods.

- 1) Submission of requests
Website : Please send the required documents via webform listed on ANA's website
(https://www.ana.co.jp/other/faq_atena/meta/0519.html)
- 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 individuals>
 - (1) Copies of two of the following: passport, health insurance certificate (masking insurance card numbers and identification symbols / numbers of insured individuals), 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 representatives>
In addition to "<For individuals>," the following documents described in (1) and (2) below are required.
 - (1) Power of Attorney (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 (masking insurance card numbers and identification symbols / numbers of insured individuals), 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 Desk
China 4008-82-8888 (Charged)

5. Transfers

When ANA share personal information of customers or entrust it to third parties within the scope of the purposes of use, ANA may 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 use 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 by ANA

Last updated on December 1, 2020

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 (hereinafter “CCPA”). In the event that any provisions of this chapter contradict those of chapter 1, the provisions of this chapter shall prevail.

The terms used in this chapter are based on the definitions provided in CCPA. For example, the term “sale”, among others, means ANA’s selling, lending, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information to another business or a third party for monetary or other valuable consideration. However, if ANA concludes an appropriate agreement concerning the handling of personal information with another business or a third party, the activities mentioned above are not regarded as “sale” from the perspective of CCPA.

1. Acquisition and use of personal information

Personal information collected by ANA in the preceding 12 months or likely to be collected in the future is classified as defined in the following table. ANA uses such information for the purposes set forth in Chapter 1, Article 3 (Purpose of using personal information). It will acquire such personal information directly from customers.

Type of personal information collected	Example of personal information
Identifiers (name or symbol, etc. used to uniquely identify a particular subject)	The customer’s name, address, telephone number, fax number, mailing address, email address, passport information, and ANA Mileage Club membership number, etc.
Additional data subject to the California Customer Records statute (personal information categories in Cal. Civ. Code Sec. 1798.80(e))	The customer’s physical and medical information relating to flying, credit card number, and payment information including details of credit/debit card and other payment methods, etc.
Characteristics of protected classifications under California or federal law	The customer’s dietary restrictions, etc.
Commercial information	The type of customer’s ANA Mileage Club membership card, membership status, membership area, mileage status, credit card expiration date, usage history of credit card and related information, need for wheelchair or other special arrangement, flight reservation and cancellation information, usage history of flights and other services, details of travel plans and arrangements, including flights with ANA and other airlines, accommodations, and other transportation arrangements, details of enquiries, requests and complaints contained in correspondence with customers, etc.
Internet or other electronic network activity information.	Information on the use of ANA website and mobile application including cookie and action log on the website, etc.
Professional or employment-related information	Employment information (company name, division/department the customer belongs to, title, address, telephone number, fax number) and related information

2. The sharing of personal information

(1) Sale of personal information

ANA will not sell customers’ personal information (including personal information concerning minors) to any third parties, and has not sold the same in the past 12 months.

(2) Disclosure of personal information for business purposes

The types of customers’ personal information that ANA has disclosed in the past 12 months for business purposes and the types of third parties to which such personal information has been disclosed are shown below.

Type of personal information collected	Example of personal information	Third party to which the personal information has been disclosed in the past 12 months
Identifiers (name or symbol, etc. used to uniquely identify a particular subject)	The customer’s name, address, telephone number, fax number, mailing address, email address, passport information, and ANA Mileage Club membership number, etc.	Other companies in the ANA Group, subcontractor handling ANA flights, airports and airlines who we partner with, various service providers, providers with whom we have a marketing partnership, government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.
Additional data subject to the California Customer Records statute (personal information categories in Cal. Civ. Code Sec. 1798.80(e))	The customer’s physical and medical information relating to flying, credit card number, and payment information including details of credit/debit card and other payment methods, etc.	Other companies in the ANA Group, subcontractor handling ANA flights, airports and airlines who we partner with, various service providers, providers with whom we have a marketing partnership, government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.
Characteristics of protected classifications under California or federal law	The customer’s dietary restrictions, etc.	Other companies in the ANA Group, subcontractor handling ANA flights,
Commercial information	The type of customer’s ANA Mileage Club membership card, membership status, membership area, mileage status, credit card expiration date, usage history of credit card and related information, need for wheelchair or other special arrangement, flight reservation and cancellation information, usage history of flights and other services, details of travel plans and arrangements, including flights with ANA and other airlines, accommodations, and other transportation arrangements, details of enquiries, requests and complaints contained in correspondence with customers, etc.	Other companies in the ANA Group, subcontractor handling ANA flights, airports and airlines who we partner with, various service providers, providers with whom we have a marketing partnership, government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.
Internet or other electronic network activity information.	Information on the use of ANA website and mobile application including cookie and action log on the website, etc.	Other companies in the ANA Group, various service providers, providers with whom we have a marketing partnership, government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.
Professional or employment-related information	Employment information (company name, division/department the customer belongs to, title, address, telephone number, fax number) and related information	Other companies in the ANA Group, various service providers, providers with whom we have a marketing partnership, government organizations, regulatory and law enforcement authorities, judicial, customs and immigration authorities, third-party organization, etc.

3. Request about handling of Personal Information

Customers living in California have the following rights concerning their personal information:

(1) Access right

Customers have the right to make a request to ANA for the disclosure of the following information regarding their personal information collected/used/disclosed by ANA within the 12 months before the date of request (hereinafter "Access Right"), up to twice in 12 months.

- Type of the customer's personal information collected by ANA
- Source of the collection of such personal information
- Business or commercial purposes for the collection of such personal information
- Type of third party with which such personal information has been shared
- The customer's specific personal information collected by ANA
- Type of the customer's personal information disclosed by ANA for a business purpose
- Type of third parties to which each type of such personal information has been disclosed

(2) Deletion right

Customers have the right to make a request to ANA for the deletion of their certain personal information collected by ANA (hereinafter "Deletion Right").

When exercising the Access Right or Deletion Right, please contact the following. Once ANA receives such a request, it will be handled according to the related laws and regulations within a reasonable timeframe and manner, after confirming, through the procedures for individual identification described below, that the request was submitted by the customer himself/herself.

1) Submission of requests

Website : https://www.ana.co.jp/other/faq_atena/meta/0519.html

Telephone : Please contact the following

U.S. 1-800-235-9262 (Toll-free)

310-782-3011 (Charged)

2) Procedures for individual identification

<For individuals>

Upon receiving a request for the exercise of the Access Right or Deletion Right, ANA will ask the customer to submit information sufficient to confirm that such request was submitted by such customer himself/herself, such as his/her name and email address, and compare the submitted information with the information held by ANA.

<For representatives>

In addition to the information required for the identification of individual in "<For individuals>," a power of attorney (legal representatives must provide a certifying document) needs to be submitted. In addition, ANA may ask the customer to directly contact ANA to confirm that he/she has granted the representative authority to exercise the Access Right or Deletion Right.

As a rule, ANA will not treat customers who have submitted such requests in a discriminatory manner, such as changing their services. Even so, please note that deletion requests may prevent customers from receiving services which they have been provided with, or may impede the provision of services that are in accordance with their needs.