

[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 to 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 describes the handling of personal information as it applies to all customers. Chapter 2, Chapter 3, Chapter 4, and Chapter 5 provide region-specific information for customers who are located or reside in the European Economic Area/the United Kingdom, the People's Republic of China, the state of California of the United States, and the Kingdom of Thailand, respectively.

Chapter 1. ANA's Handling of Personal Information of All Customers

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.

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. However, even within the intended scope, it will not use customers' personal information in a way that may encourage or induce illegal or improper conduct.

- (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) Research and analysis of usage of ANA's services/products
- (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) Notification of services and products offered by ANA
- (9) Announcement, implementation, and management of services, products, various events, and campaigns that are handled by ANA, ANA Group companies, partner companies, etc. and were developed using analytical data (including information on the usage of ANA's services/products and browsing history for the ANA website and mobile application) to be in line with customers' interests and preferences; as well as provision of various pieces of information through methods including direct email, email newsletters, notices, and advertisements
- (10) 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 information on the usage of the ANA website and mobile application
Information such as that on how customers use the ANA website and mobile application, including details on cookies, advertising identifiers (IDFA/GAID), location information, unique device identifiers, details on OS and browser type, etc., and website activity logs
(For details on the purpose of use of cookies and other related matters, please see the Cookie Policy.)

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	(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.
Name, address, and representative of the party responsible for management of personal information	ANA Holdings Inc. Shiodome City Center, 1-5-2, Higashi-Shimbashi, Minato-ku, Tokyo, Japan 105-7140 Koji Shibata, President & Chief Executive Officer

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

Depending on customers' flight destinations, ANA may transfer their personal information (name, passport number, and travel details, etc.) to outside of Japan. The countries served by ANA can be found on ANA's website. The countries or regions to which customers' personal information is transferred may not have a system for personal information protection equivalent to Japan's.

If ANA provides customers' personal information to third party business operators outside of Japan, including entrusted companies and data sharing partners, ANA will do so based on customer consent, except in either of the following cases:

- (1) when the third party is located in a country specified by laws and regulations as one that has a personal information protection system equivalent to Japan's; or
- (2) when the third party has a system in place where it can continuously take measures corresponding to those that business operators handling personal information in Japan should take.

In the case of (2) above, ANA will take necessary and appropriate measures to ensure that the third party takes the corresponding measures on an ongoing basis. If you wish to know the details of ANA's measures, please make a request in accordance with "11. Request about handling of Personal Information".

10. Management of personal information

In receiving customers' personal information, ANA will manage such information according to the strictest standards and take necessary safety management measures 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.

If you wish to know the details of the safety management measures, please make a request in accordance with "11. Request about handling of Personal Information".

*For ANA's action policy for information security, please refer to "ANA Group Information Security".

https://www.ana.co.jp/group/en/csr/risk_management/security/

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 of use, erasure, or information provision concerning the personal information protection measures referred to in "9. Transfer to outside of Japan" and "10. Management of personal information" ("disclosure, etc.") with regard to 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, purpose of use, or records on the provision of personal data to third parties 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.
- (4) Request for information provision concerning personal information protection measures
The following information will be provided in accordance with the customer's request.
 - 1) Details of the safety management measures taken by ANA in receiving customers' personal information
 - 2) Details of the measures taken by ANA when providing customers' personal information to third parties outside of Japan (in the case of "9. Transfer to outside of Japan" (2))

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

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

[If you wish to receive response to your disclosure request by mail]

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

[If you wish to receive response to your disclosure request by electronic file format]

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

(<https://ana.force.com/enjp/s/atmint-en>)

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 resident 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 applies 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 processing 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 a 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 applies to the handling of personal information of persons residing in the People's Republic of China (hereinafter, "China") based on China's Personal Information Protection Law and related regulations (hereinafter, "PIPL etc."). 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. In the event that a person such as a family member applies for ANA's service on behalf of the data subject, the consent of the data subject (when he/she is under the age of 14, his/her guardian) to this Privacy Policy must be obtained.

2. Collection of sensitive personal information

For the purpose of use, ANA may handle personal information that can be classified as sensitive personal information under PIPL etc., such as information about one's passport, health condition, payment, or accommodations.

Since sensitive personal information can negatively affect the interests of customers if it is leaked or used unlawfully (for example, it is likely that individual dignity will be damaged or that personal safety and asset security will be put at risk), ANA will carefully manage such information and handle it in a lawful manner.

3. 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 the Conditions of Carriage –domestic passenger and baggage- and –international passenger and baggage-.
- (3) Other personal information
The shortest required period for the purpose to which customers have consented.

4. Technology and measure to protect customers' personal information

- (1) ANA takes security measures to protect customers' personal information from leakage, alteration or loss. Specifically, ANA takes the following measures to protect customers' personal information.

- ANA establishes and implements an internal management system and operational rules relating to the protection of personal information.
- ANA conducts classification management for 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 allocates access rights reasonably and controls access, so that access by unauthorized persons to personal information will be prevented.
- In order to raise employee awareness of the importance of protecting personal information, ANA provides education and training on security and privacy protection.
- ANA establishes emergency responses for personal information incidents and prepares for their implementation.

- (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 shortest period of time required to achieve the purposes stated in this Privacy Policy, unless an extension of the retention period is permitted by law.

- (3) In the event of a personal information incident, ANA will promptly inform customers of the relevant circumstances of the incident in accordance with the requirements of PIPL, etc. and report to the regulatory authorities.

5. Request about handling of Personal Information

In the event that ANA receives a request regarding the personal information it holds of a customer who is a resident of China, the request will be handled in a reasonable timeframe and scope in accordance with PIPL, etc. and Chapter 1 "Article 11 Request about handling of Personal Information". In responding to the request, ANA may confirm that it was submitted by the customer himself/herself.

- (1) Request for withdrawal of consent

If the handling of the customer's personal information is based on his/her consent, the customer has the right to withdraw such consent.

Personal information items designated by the customer will be deleted in accordance with the customer's request, wherever possible and appropriate.

However, please note that such deletion 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 interpretation/explanation of Privacy Policy

Customers have the right to ask for the interpretation/explanation of this Privacy Policy.

- (3) 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 any 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)

6. Provision to third parties and transfer outside China

When ANA provides personal information of customers to third parties (including the cases of provision due to shared use and business entrustment that involves the transfer of such information outside China), it will do so in accordance with PIPL, etc.

7. 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.

8. 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 June 1, 2022

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, personal online identifier, 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 such as that on how customers use the ANA website and mobile application, including details on cookies, advertising identifiers (IDFA/GAID), location information, unique device identifiers, details on OS and browser type, etc., and website activity logs
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, personal online identifier, 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 such as that on how customers use the ANA website and mobile application, including details on cookies, advertising identifiers (IDFA/GAID), location information, unique device identifiers, details on OS and browser type, etc., and website activity logs	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.

Chapter 5. Handling of personal information of Thailand residents by ANA

1. Introduction

This Chapter 5 provides additional information about the collection, use, or disclosure (“processing”) of personal information of customers and other individuals in the Kingdom of Thailand (“Thailand”) in accordance with the Personal Data Protection Act of Thailand B.E. 2562 (A.D. 2019) (“PDPA”).

If consent is required for processing of personal information relevant to the use of ANA's services of data subjects who are minors, quasi-incompetents or incompetents under the law of Thailand and cannot lawfully give consent by themselves, consent or permission of the persons exercising parental power, their curators or custodians (as the case may be) must also be obtained. If data subjects are under the age of 10, only consent or permission of the persons exercising parental power must be obtained.

If ANA is not aware that the data subjects are minors, quasi-incompetent persons or incompetent persons prior to the collection of their personal information, upon learning that we have collected personal information of minors without the consent of persons exercising parental power (when it is required and the minors cannot lawfully give consent by themselves), or from quasi-incompetent persons and incompetent persons without the consent of their legal curator and custodian, we will delete the personal information at the earliest convenience unless we can rely on other legal grounds apart from consent for such processing.

The data subject's consent to this Privacy Policy must be obtained in the event that a person such as family member or an agent authorized to act on its behalf applies for ANA's service on behalf of the data subject.

In the event that any provisions of this Chapter 5 contradict those of Chapter 1, the provisions of this Chapter 5 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 the PDPA.

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 the PDPA.

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

- (1) When your consent is obtained to the processing (Article 19 PDPA)
Consent will usually only be relied upon for promotional and marketing related processing, or in some cases, in relation to sensitive personal information.
- (2) When processing is necessary in order to perform or take steps to enter into a contract (Article 24(3) PDPA).
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 24(6) PDPA).
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 24(2) PDPA), 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 information, and these interests are not overridden by your fundamental rights regarding your personal information under the law (Article 24(5) PDPA).
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 to the extent permissible under the PDPA.

4. Request about processing of personal information

(1) The PDPA provides 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 erase, destroy or anonymize 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 legitimate 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. However, the withdrawal of consent shall not affect the processing of your personal information that you have already given consent legally before it is withdrawn.

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 of submitting request

You can exercise your rights free of charge (except in the case where expenses may be chargeable under the PDPA). The method for submitting a request and contact information are as follows.

(Website)

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

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

(Required documents)

- Form requesting disclosure (for Thailand residents).
- Form for various requests (for Thailand residents).

(3) Responding to a request

We will respond without delay and usually within thirty (30) days. 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 not been processed appropriately, then you have the right to file a complaint with the Personal Data Protection Committee of Thailand. Please see Part 9 of this Chapter 5 (“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 PDPA.

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 communications.

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 Thailand.

When transferring personal information to third parties, ANA will ensure that it complies with the requirements of the PDPA and related Japanese laws.

However, you should be aware that recipients outside Thailand may be subject to national laws which do not necessarily provide equivalent protection for your personal information. 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.

Please note that ANA may retain your personal information for a longer period than mentioned above if it is for the purposes of the establishment, compliance, or exercise of legal claims, the defense of legal claims, or the purpose for compliance with the law.

9. Lodging a complaint with an authority

Customers have the right to lodge a complaint on the processing of their personal information with the Personal Data Protection Committee of Thailand.

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