

# ANA Privacy Policy

## [Basic Policy]

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

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

Within ANA's business operations, our customers' personal information is essential in order for us to provide fully satisfactory services. We recognize the importance of the information received from our customers, and make efforts in handling this information. For your safe and trusted use of ANA, we fully instruct our executives and employees about laws and company regulations related to personal information, and have established our company's structure, to include measures for safety and exert maximum effort toward appropriate management and use of each customer's personal information.

April 1, 2013

ALL NIPPON AIRWAYS CO., LTD.

## 3 Collecting personal information

ANA will obtain personal information only by fair, appropriate means.

## 4 Disclosure to third parties

ANA will not disclose or provide personal customer information to any third parties except under the following circumstances or for the following purposes. 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 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] Before providing information, the following information is provided and made available to the respective customer, and provision of such information may be suspended upon the customer's request: 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; and 4) Provisions of personal information identifying individual customers shall be suspended upon the customers' request.
- [6] Data or information is provided in a format that does not disclose identity, as in statistical data.
- [7] Information is provided as a result of the succession of business due to a merger, company split, transfer of business or otherwise.

## Handling of Personal Information

### 1 Scope

The Privacy Policy will apply to all customers using ANA services and products.

### 2 Purpose of collecting personal information

Personal information obtained from customers will be used 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, airport services for interline transportation, wet lease, code share, intermodal transportation.
- [3] Service provisions for ANA Mileage Club members
- [4] Guidance, provision, and management of other services and products offered by ANA
- [5] All operations incidental or related to the above (1) - (4)
- [6] Implementation of questionnaires concerning service and products, etc. offered by ANA
- [7] Development of new services and products
- [8] Management and information provision for various events and campaigns
- [9] Notification of services and products offered by ANA
- [10] Management and notification of services, products, events and campaigns of ANA Group companies and partner companies.
- [11] Responses to inquiries and requests

## 5 Data sharing

ANA shall share personal customer information as follows.

Scope of Data Sharing	ANA HOLDINGS INC.	Air Japan Co.,Ltd. ANA WINGS Co., Ltd.	ANA Sales Co., Ltd. companies (*1)
Purpose of use by the user	(1) For development of new services and products, etc. (2) For notification of new products and services by direct mail, etc. (3) For delivery and transfer to the relevant company in the event of an inquiry, application for use or other request from a customer regarding products and services provided by ANA Group companies. (4) For appropriate and smooth fulfillment of other transactions with customers, etc.	Provision of air transportation services	Provision of information required for tours, hotels, and other air travel services and related operations
Personal information items to be shared	AMC Number, Customer Name, Address, Telephone and Fax numbers, E-mail Address, Business contact (Name of Company, Department, Title, Address, Telephone and Fax Numbers), Mailing Address, Member Card Type, Member Service Qualification, Membership Area, Mileage Status, Credit-card number and expiration date, need for wheelchair arrangements, Flight reservation and cancellation information, boarding status, etc.		AMC Number, Customer Name, Address, Telephone and Fax numbers, E-mail Address, Business contact (Name of Company, Department, Title, Address, Telephone and Fax Numbers), Mailing Address, Member Card Type, Member Service Qualification, Membership Area, Mileage Status, Credit-card number and expiration date, need for wheelchair arrangements, etc.
Party responsible for management of personal information	ANA		

\*1 ANA Sales Co.,Ltd. companies

ANA Sales Co.,Ltd • ANA Tours China Co.,Ltd • ANA Sales Americas • ANA Sales Europe Ltd.

## 6 Business entrustment

From time to time, ANA may entrust its business operations to third parties to which personal information may also be disclosed to the extent required. In these cases, we will implement all appropriate measures with such third parties to safeguard the confidentiality of customer data, including establishing agreements on the handling of such personal information.

## 7 Managing personal information

We manage our customers' information according to the strictest standards and take the utmost care to prevent leaks, loss, or alterations. We ensure that our 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 shall be established separately in accordance with the purpose for which such information is used. Following the expiration of this period, we shall dispose of the information in question by appropriate methods.

## 8 Disclosure, correction, deletion, addition, discontinuance, and erasure

Any customer request submitted in the manner specified for 1) the disclosure, 2) the correction, deletion, or addition, or 3) the discontinuance and erasure of personal information held by ANA shall be handled as follows, within a reasonable timeframe, after such requests are determined to be authentic.

A customer request may be rejected partially or entirely if compliance with such request would endanger the life, health, or property of the customer or a third party; seriously impact ANA's business operations; or result in a violation of laws or regulations.

- 1) Appropriate acknowledgement will be made of receipt of disclosure requests.
- 2) Correction, deletion, or addition shall be undertaken as necessary after due review of requests.
- 3) Discontinuance and erasure shall be undertaken by appropriate methods. However, we remind customers that such requests may impede the provision of services to the customer, despite our best intentions.

## 9 Inquiries and submission of request for disclosures

Requests concerning personal customer information or other inquiries concerning personal information shall be handled as follows.

Regular ANA reservation confirmations and boarding confirmations are handled, at no charge on the ANA SKY WEB ([www.ana.co.jp/eng](http://www.ana.co.jp/eng)) or at our ANA Reservation Center. Information on the ANA Mileage Club is handled at no charge through the ANA SKY WEB ([www.ana.co.jp/eng](http://www.ana.co.jp/eng)) or the ANA Reservation Center. In both cases, requests will be rejected if customer identification cannot be confirmed.

### [1] Information desk

Any customer request for disclosure, correction or deletion, addition, discontinuance, or erasure must be made using the specified forms, accompanied by the necessary documents, and received by mail at the following addresses:

#### **Matters related to ANA Mileage Club**

ANA Mileage Club, Personal Information Handling Desk  
P.O. Box 20, Gate City Osaka Post Office, Tokyo, Japan 141-8411

#### **Other**

All Nippon Airways Co., Ltd. Personal Information Handling Desk  
Shiodome-City Center, 1-5-2, Higashi-Shimbashi, Minato-ku,  
Tokyo, Japan  
105-7133,

### [2] Documents required for disclosure

Any "request for disclosure, etc." must be submitted by post after completing request forms (A) and enclosing personal identification documents (B) below. Customer requests for disclosure, etc. may not be acknowledged if any of the required information is missing. The forms under (A) may be downloaded from ANA SKY WEB ([www.ana.co.jp/eng](http://www.ana.co.jp/eng)) or obtained from ANA check-in counter.

#### **(A) Forms designated By ANA**

- \* Form requesting disclosure of "personal data" held by ANA
- \* Form requesting modification of "personal data" held by ANA
- \* Form requesting discontinuance of usage of "personal data" held by ANA
- \* Form requesting of usage of "personal data" held by ANA

#### **(B) Documents required for confirmation of identification of individual or representatives**

##### **<For the individual>**

① Two from either a copy of driver's license, passport, health insurance certificate, basic resident registration card with photo, pension insurance booklet, physical disability certificate, foreign resident registration or certificate of seal registration.

##### **<For the representative>**

① Letter of trust

(Legal representatives shall provide certifying document.)

② Identification documents of representative

(Two from either a photocopy of the agent's driver's license, passport, health insurance card, basic resident registration card with photo, pension insurance booklet, physical disability certificate, foreign resident registration certificate, or certificate of seal registration.)

### [3] Fee

A fee of 500 yen (including tax) will be charged for the request of each item for disclosure.

## 10 Application and modification of the Privacy Policy

This Privacy Policy explains how ANA handles personal customer information. Use of ANA services and products by a customer is deemed to constitute full understanding of and consent to the terms of this Privacy Policy.

This Privacy Policy is subject to revision by ANA at any time.