

# AirJapan Privacy Policy

## Basic policy

In business operations of Air Japan Co., Ltd.(hereinafter referred to as “Air Japan”) 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 Air Japan 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 provides region-specific information for customers located or residing in the Kingdom of Thailand.

## Chapter 1 Air Japan’s Handling of the Personal Information of All Customers

### 1. Introduction

This Privacy Policy explains how and why the personal information of customers and other individuals obtained by Air Japan Co., Ltd. (“Air Japan”, “we”, “our” or “us”) is used. Please read this Privacy Policy carefully before providing personal information to Air Japan or using Air Japan’s 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 Air Japan products or services, details of which will be provided separately described in their respective terms of service and other relevant documents.

## 2. Scope of application

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

## 3. Purpose of using personal information

Air Japan 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. Research and analysis of usage of Air Japan's services/products
4. All operations incidental or related to 1. through 3. above
5. Implementation of questionnaires concerning service and products, etc., offered by Air Japan
6. Development of new services and products
7. Notification of services and products offered by Air Japan
8. Operation and management relating to the events and campaigns implemented by Air Japan, ANA Group companies, partner companies, etc.
9. Provision of information about the services, products, events and campaigns of Air Japan, ANA Group companies, partner companies, etc. as well as provision of various pieces of information through methods including direct mail, e-mail magazines, notices, and advertisements.

\*Customers' personal information (analytical data, etc. such as details of the usage of services and products of AirJapan, ANA Group company, etc., Air Japan website and mobile app browsing history, etc.) may be analyzed using AI, etc. to estimate customer hobbies, tastes, purchasing trends, attributes, etc., and the results used to formulate advertising distribution and marketing measures, etc. targeting the customer.

10. Response to inquiries and requests.

In addition to the above-mentioned purposes, personal information will be utilized for the purposes described in Article 8 (Data sharing) below.

## 4.Acquisition of personal information

Air Japan 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 Air Japan and other airlines, accommodations, and other transportation arrangements, etc.

### (3) Details of enquiries and complaints to Air Japan

Details of enquiries, requests and complaints contained in correspondence with customers, (including their cause and resolution), etc.

- Air Japan 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.

### (4) IT and system data including information on the usage of the Air Japan website and mobile application

Information such as that on how customers use the Air Japan website and mobile application, including details on cookies, advertising identifiers (IDFA/GAID), location information, unique device identifiers, IP Address, details on OS and browser type, etc., and website activity logs by which Air Japan may be able to identify a specific individual

(For details on the purpose of use of cookies and other related matters, please refer to [AJX Cookie Policy](#) “3. Purpose of use of cookies.”)

Air Japan 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.Acquisition of personal-related information**

Air Japan may receive personal-related information about customers directly from customers or from third parties or ANA Group companies. "Information related to personal information" in this Chapter 1 means information relating to a living individual which doesn't fall under personal information, pseudonymized personal information or anonymized personal information defined in the Act on the Protection of Personal Information (Act No. 57 of 2003) of Japan.

(Example of information related to personal information)

Details on cookies, advertising identifiers (IDFA/GAID), location information, unique device identifiers and IP address, as listed in “ (5) IT and system data including information on the usage of the Air Japan website and mobile application” of “4. Acquisition of personal information”, by which Air Japan cannot identify a specific individual.

(Example of receiving information related to personal information)

Obtaining advertising identifiers from third parties or ANA Group companies to for advertising distribution

If we will link such personal-related information to customer personal information held by Air Japan or an ANA Group company and use it as personal information, then we will obtain the consent of the customer in advance and handle the information appropriately in accordance with the purpose of use specified in "3. Purpose of using personal information" unless we have specified another purpose.

## **6.Choice by the customer**

As a rule, Air Japan 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 Air Japan, or being unable to receive campaign notices and other Air Japan information because a part of the functions of Air Japan’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 Air Japan.

## **7.Disclosure and provision of information to a third party**

Air Japan will not disclose or provide personal customer information to any third parties except under the following circumstances. Also, customers’ personal information including special care-required personal 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 Air Japan 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. Method of accepting requests from customers

## 8. Data sharing

Air Japan may share customer personal information as follows.

<b>Scope of data sharing</b>	ANA Group Companies
<b>Purpose of using data by the user</b>	<ol style="list-style-type: none"> <li>1. For provision of air transportation services, travel services including tours and hotels, and other products/services handled by Air Japan or companies that share data</li> <li>2. For sending of direct mail and information on products/services, and distribution of questionnaire (s) to customers, etc. by Air Japan or companies that share data</li> <li>3. For sales analysis, other research/studies, and development of new products/services, etc. by Air Japan or companies that share data.</li> <li>4. For delivery and transfer of data when we receive inquiries, application for use or other offers from customers regarding products/services provided by Air Japan or companies that share data</li> <li>5. For appropriate and smooth fulfillment of other transactions with customers by Air Japan or comp</li> </ol>
	<p>anies that share data</p> <ol style="list-style-type: none"> <li>6. For business management/internal management by the ANA Group</li> </ol>
<b>Items of personal information to be share d</b>	Customer's name, address, telephone number, fax number, email address, employment information (company name, division/department the customer belongs to, title, address, telephone number, fa x number), mailing address, passport number, 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, membership status, district of stay, 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 Air Japan website and mobile application, including cookie and action log on the website, etc.
<b>Name, address, and representative of the party responsible for management of personal information</b>	<p>ANA Holdings Inc.</p> <p>Shiodome City Center, 1-5-2 Higashi-Shimbashi, Minato-ku, Tokyo 105-7140</p> <p>Koji, Shibata, President and CEO</p>

## 9. Business entrustment

In providing products and services to customers, Air Japan 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, Air Japan 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.

## **10. Transfer to outside of Japan**

Depending on customers' flight destinations, Air Japan may transfer their personal information (name, passport number, and travel details, etc.) to outside of Japan. The countries served by Air Japan can be found on our 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 Air Japan 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, Air Japan 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 Air Japan's measures, please make a request in accordance with "12. Request about handling of Personal Information".

## **11. Management of personal information**

In receiving customers' personal information, Air Japan will manage such information according to the strictest standards and take necessary safety management measures to prevent leaks, loss, or alterations. Air Japan 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, Air Japan 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 "12. Request about handling of Personal Information".

- For our action policy for information security, please refer to "[ANA Group Information Security](#)".

## **12. Request about handling of Personal Information**

If Air Japan 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 "10. Transfer to outside of Japan" and "11. Management of personal information" ("disclosure, etc.") with regard to the customer's personal information stored in a database held by Air Japan, 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 to the extent appropriate and possible.

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. Please understand this in advance prior to submitting a request.

## **(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 Air Japan in receiving customers' personal information.
2. Details of the measures taken by Air Japan when providing customers' personal information to third parties outside of Japan (in the case of "10. Transfer to outside of Japan" (2))

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

## **13. 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 Air Japan from customers, and contact information are as follows.

### **Request for disclosure, etc.**

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#### **(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)

ANA Sky Center 3B Narita International Airport, Narita City, Japan 282-0005

AirJapan Co., Ltd., General Administration, section in charge of handling personal information

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## (2) Required documents

Application form (choose one of the following in accordance with your request) Form

requesting disclosure [Attach PDF]

Form for various requests [Attach PDF]

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. (If requesting own information)

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 "<If requesting own information>," 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. Please refer to the details on each request form. 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.

## 14. Disabling cookies and advertising identifiers

Please refer to AJX Cookie Policy “5. Disabling cookies.”

## 15. Modification of the Privacy Policy

Air Japan may make modifications to this Privacy Policy. If modifications are made, details will be posted on the Air Japan website (<https://www.flyairjapan.com/en>), so please check for any changes.

Air Japan Co.,Ltd.

Hideki Mineguchi, President C.E.O.

ANA Narita Sky Center, Narita International Airport,

Chiba 282-0005, Japan

# Chapter 2

## Handling of Personal Information of Customers Located in Thailand

### 1. Introduction

Under the laws of the Kingdom of Thailand, for customers who are minors, persons with limited capacity, or persons without the capacity to act, if consent is required for the processing of personal information regarding the use of Air Japan's services, and the customer is unable to give valid consent under the law, the consent or permission of the customer's parent or guardian (as the situation requires) must be obtained in addition to the customer's own consent, and for those under 10 years of age, the consent or permission of a parent or guardian only is required.

In the event that Air Japan does not know prior to the acquisition of personal information that the customer is a minor, a person of limited capacity or without the capacity to act and acquires the personal information of a minor without the consent of a person with parental authority (provided that such consent is necessary and the minor is unable to lawfully give such consent), alternatively, if the personal information of a person of limited capacity or without the capacity to act is obtained without the consent of a parent or guardian, unless Air Japan can base such processing on a legal basis other than consent, the information will be deleted as soon as possible.

Customers who apply for use of Air Japan's services on someone's behalf, such as family members of the customer or agents who can act on the customer's behalf, are requested to apply after obtaining the customer in question's consent to Air Japan's handling of personal information.

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 Air Japan.

Air Japan 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 PDPA.

### **3. Our lawful basis for processing personal information**

Air Japan 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 PDPA.

Air Japan may handle customer personal data on one or more of the following lawful bases:

1. When your consent is obtained to the processing (Article 19 of the PDPA).  
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 24 (3) of the 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. Air Japan needs to process the information to comply with a lawful obligation (Article 24 (6) of the PDPA).  
This includes the requirement to share personal information with customs and immigration authorities or law enforcement, as well Air Japan's legal duties towards its staff and customers.
4. The information is required to protect your, or a third party's vital interests, for example in the event of a medical emergency (Article 24(2) of the PDPA)
5. It is in Air Japan's or a third party's legitimate interests to process the personal data, and these interests are not overridden by your rights under the law (Article 24 (5) of the PDPA)  
This includes, to the extent permitted under the PDPA, the use of personal information necessary to operate Air Japan'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) **The PDPA provides you with the following legal rights:**

1. Request for disclosure

You can request copies of your personal information held by Air Japan 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

Customers may request that all or part of their personal information in Air Japan's possession be deleted, destroyed, or rendered unidentifiable.

Air Japan 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.

Air Japan will cease processing of customer information unless it can be proven that the processing for the legitimate interests of Air Japan or a third party takes precedence over the customer's interests. 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. 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 will not retroactively affect the processing of the personal information that the customer had legally consented to prior to the withdrawal.

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 Air Japan will be retained so that we can ensure we have complied with our legal obligations.

## **(2) Method for submitting request**

Customers may exercise their rights free of charge (except where the PDPA permits a fee to be charged). The method for submitting a request and contact information are as follows.

Please send the required documents to the following e-mail address.

<mailto:cs@ajx.ana-g.com>

<Application Form>

[Form requesting disclosure](#) (For persons located in the Kingdom of Thailand)

[Form for various requests](#) (For persons located in the Kingdom of Thailand)

## **(3) Responding to a request**

Air Japan will generally respond to requests within 30 days of receipt.

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 file a complaint with the Personal Information Protection Commission of Thailand.

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**

Air Japan’s products and services are provided with the assistance of other companies and organizations and often Air Japan 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 Air Japan 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 Air Japan flights, airports and airlines who we partner with, various service providers, providers with whom we have a marketing partnership, etc.

Where Air Japan 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**

Air Japan may send marketing information to customers who request it to inform them about news and details of products and services.

Such information will only be sent to customers who have consented to receive marketing information.

## **7. Where your personal information is stored and transferred**

Air Japan is located in Japan and many of the service providers and other organizations with whom we share personal information are located in jurisdictions outside of the Kingdom of Thailand.

When Air Japan provides personal information to third parties, the relevant laws and regulations of Japan and the requirements of the PDPA will be complied with.

Please note, however, that outside of the Kingdom of Thailand, personal information may not be equally protected by national laws. If you would like more information regarding where your personal information is stored and transferred please contact Air Japan using the details set out in Part 13 of this Chapter 1 (“Submission of request for disclosure, etc.”)

## **8. Retention of personal information**

Air Japan retains customers’ personal information until the purpose of use is achieved. Particularly, Air Japan 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 passengers

Until completion of transportation and related services stipulated in Conditions of Carriage for International Flights

2. Other personal information

Required period for the purpose which customers have consented

However, note that Air Japan may retain personal information beyond the retention periods described above for the purpose of asserting legal claims, defending against legal claims, and complying 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 Information Protection Commission of Thailand.

## **10. The contact information of the controller**

### **Controller**

AirJapan Co., Ltd.

ANA Sky Center 3B Narita International Airport, Narita City, Japan.

Contact: [infosec@ajx.ana-g.com](mailto:infosec@ajx.ana-g.com)